

Center for Nuclear Waste Regulatory Analyses

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September 29, 1988

U.S. Nuclear Regulatory Commission
Attn: Mr. Philip M. Altomare
Office of Material Safety & Safeguards
Division of High-Level Waste Management
WF1
Mail Stop 4-H-3
Washington, DC 20555

References: 1. "Modification to Cost Allocation...", J.E. Latz to M. Mace,
July 14, 1988.
2. "Final Specification/Acceptance Criteria...", W.C. Patrick
to J.O. Bunting, August 12, 1988.

Subject: Selection of Regulatory Requirement to Support Major Milestone R7

Dear Mr. Altomare:

The Center has completed the subject selection of a Regulatory Requirement for use in executing the "proof-of-system" attendant to fulfillment of Major Milestone R7. This milestone was established in Reference 1 and its characteristics were specified in Reference 2. As noted in this latter reference, a single Regulatory Requirement can be used to exercise all of the pertinent features, operations, and reporting functions of the Program Architecture (PA) and the Program Architecture Support System (PASS). The selected item is:

E-17 Regulatory Requirement Topic: Adverse Condition - Geochemical
(general subject) Processes

Regulatory Text I.D. Numbers: 10CFR60.122(c)(8)
10CFR60.122(c)
10CFR60.122(a)(2) *

This Regulatory Requirement was selected because it possesses several attributes that are essential to its effective use in the R7 deliverable. First, it is siting related and, thus, is among the most time-urgent of the provisions of 10CFR60. Second, while being a technical aspect of the regulation, it appears

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to embody certain Regulatory Uncertainty as well. Third, it is part of a relatively complex portion of the regulation, involving several sections of pertinent Regulatory Text, but still offers the opportunity for expressing a tractable solution for purposes of demonstrating the program management aspects of PA and PASS.

Please contact me if you have any questions regarding this matter.

Sincerely yours,



Allen R. Whiting, Director
Systems Engineering and Integration

cc: J. Bunting
J. Latz
W. Patrick
J. Russell