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CNWRA 880040/P4-D9

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Allen R. Whiting, Director
 Systems Engineering and Integration Department
 Center for Nuclear Waste Regulatory Analyses
 P.O. Drawer 28510
 6220 Culebra Road
 San Antonio, Texas 78284

Dear Mr. Whiting:

SUBJECT: CONCURRENCE REGARDING "PROGRAM ARCHITECTURE DATABASE WORK
 INSTRUCTION" UNDER TOP-001-03 (MILESTONES P4 AND D9)

This letter is to verify my concurrence on Technical Operating Procedure (TOP)-001-03 entitled "Submission and Verification of Program Architecture Database Entries" that was transmitted by your letter of August 26, 1988, and more recently referenced in your letter of September 2, 1988 regarding element/subelement milestone P5.

In reviewing this document and other related material (e.g., element/subelement milestones A3, A4, and R7), NRC's CNWRA Management Staff brought to my attention a number of comments with regard to the TOP procedure itself. These comments have been enclosed for your review and consideration. Hopefully you will find that these recommendations improve the verification procedure that this particular TOP is attempting to achieve, and that these recommendations can be included in any future revisions.

However, I wish to bring to your attention two major concerns raised by the CNWRA management staff. First, we are concerned about the potential for conflict-of-interest in reviewing one's work (vis-a-vis TOP-001-03) owing to the limited size of the Center's staff. This concern is further compounded in so far that in performing any TOP-001-03 review, that the individual(s) performing the verification review are "technically" qualified to perform such a review. We recognize though that these concerns may be unavoidable until the number of Center staff increases and their expertise supplemented.

Our second concern regards the close affinity between the TOP-001-02 (Program Architecture Relational Database Work Instruction) and TOP-001-03 procedures which, respectively, are intended for use in construction of the Program Architecture database and latter, to verify the adequacy and completeness of the information in that database. Some staff have suggested that the "verification criteria" included as an attachment to TOP-001-03 should in fact be the contents of TOP-001-02 to ensure consistency between the two TOP documents.

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Att: ACNW & CNWRA

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Finally, page 13 of TOP-001-03 indicated that the development of the the "PA Relational Database Verification Criteria" attachment was continuing. We would be interested in receiving any additions to these "criteria" as they become available for the purposes of PARC-related activities.

Thank you for your attention to this matter.

Sincerely,

Original Signed By

Joseph O. Bunting, Chief
Engineering Branch
NRC/CNWRA Program Manager

Enclosure: As stated

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COMMENTS ON TOP-001-03

1.0 PURPOSE AND SCOPE -- No comment.

2.0 DEFINITIONS -- No comment.

3.0 RESPONSIBILITY --

Section 3.1 -- This section states that the WSE&I Subelement Manager has responsibility for Program Architecture Database verification activities. If the WSE&I Subelement Manager was involved as a member of the PARC that developed the guidelines, then isn't there a potential for conflict-of-interest?

4.0 CRITERIA --

Section 4.1 -- The construction of this paragraph is some what awkward and presented problems for us in trying to follow your logic. For example, the first sentence states that four key criteria dominate the required review and verification process, suggesting that there are other criteria which are not named here, but somewhere else. The attachment is said to contain specific verification criteria. However, the four key criteria are not specifically mentioned in the attachment.

Section 4.2 -- The qualification standards presented in this section appear inadequate to provide the required review and verification of PADB inputs. Regarding the 1st qualification standard, it is not at all clear that the requirement for reviewers to possess capability in terms of training and experience, also includes the requirement for reviewers to possess essential expertise to address the technical analyses whose results they are reviewing. It is further not clear who will make the determination that the reviewers will possess the required technical expertise to be effective reviewers. Recommend this section be expanded to include an additional qualification standard that would make it mandatory that reviewers possess the essential technical expertise appropriate to the Regulatory Requirement they are reviewing. It is further recommended that this section be expanded to include criteria that will identify the process of selection of the appropriate reviewers for the job.

5.0 PROCEDURE

Section 5.2 -- See previous comment on section 3.1 regarding the potential for conflict-of-interest. Again we should be concerned about the potential for any one individual reviewing his or her own work under the auspices of PARC.

ENCLOSURE

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Section 5.5 -- This procedure is a good one to have. However, the discussion under the paragraph, specifically the third sentence should be amended to reflect documentation of the "reasoning" that supports the content of PADB input.

Section 5.6 -- The term "corrective action" is used in section 5.6. This term has a specific connotation in the CNWRA Quality Assurance (QA) Manual. Please consider whether usage in this instance is compatible with the usage in the QA Manual.

Section 5.7.5 -- Section 5.7.5 allows for the Element/Subelement Manager (PEM/SEM) to designate another individual to review PARC comments, and either accept or reject them. What are the requirements for designating this requirement? How is it assured that the individual chosen has the knowledge and understanding necessary? (see comments regarding section 4.2) Does the PEM or SEM review these decisions?

6. FORMAT AND CONTENT GUIDE FOR INPUTS -- No Comment.

7. RECORDS -- No Comment.

8. QUALITY ASSURANCE -- Our interpretation of this section is that a QA program in accordance with the provisions of Sections 4.A.4.7 and 4.A.4.8 of TOP-001, revision 1 is now being implemented. If this is not the case, please let us know immediately so that we may assure that this issue is rectified.

ATTACHMENT

Regulatory Requirement Topic (Field 8)

What consideration is being given to the rank-order of keywords? Should the verification criteria include a rank-order criterion?

Regulatory Requirement (Field 9)

How would it be clear to the user of PASS or for that matter to the PARC reviewer which regulatory "requirement" (e.g., regulation) is driving the regulatory requirement "topic"?

Regulatory Requirement Notes (Field 9)

Suggest the subject matter relevant to "regulatory requirement notes" be expanded to include "related regulatory requirement notes" or a separate "note" field be added to PADB Field 12.

Elements of Proof (Field 15)

The wording presented in "(b)" leaves it unclear as to whether some "elements of proof" (EOP) not associated with "regulatory uncertainly" are to be presented. The wording could be interpreted that only those EOP's that are affected by "regulatory uncertainly" and must be postulated are not be included in this field. Suggest this be made clearer.

ENCLOSURE