

APR 20 1989

CNWRA890015/PA PLAN COMMENTS

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Mr. John E. Latz, President  
 Center for Nuclear Waste Regulatory Analyses  
 P.O. Drawer 28510  
 6220 Culebra Road  
 San Antonio, Texas 78284

Dear Mr. Latz:

SUBJECT: CONCURRENCE ON "PROGRAM ARCHITECTURE COMMENT AND RESOLUTION AND RELATED MATERIALS"

The purpose of this letter is to provide you with copies of NRC's comments on two of the three draft documents (facsimile transmissions dated March 17 and March 20, 1989) submitted under the above-mentioned general title. Staff from NRC's Division of High-Level Waste Management and the Office of the General Counsel have performed the necessary reviews. The three draft documents in question are:

- 1) "ACTIONS RE NRC COMMENTS ON PA PROCESS AND PRODUCTS" (draft dated March 17, 1989);
- 2) "DRAFT OUTLINE -- ADMINISTRATIVE PROCEDURE ON PROJECT MANAGEMENT AND CONTROL" (draft dated March 17, 1989); and
- 3) "RECOMMENDED PA PROCEDURAL REVISIONS" (draft dated March 20, 1989).

On March 22, 1989, we provided you with our concurrence on the proposed revisions to the current version of Technical Operating Procedure (TOP) 001-02, "Program Architecture Relational Database Work Instruction" subject to some minor line-in/line-out changes. This concurrence was in response to item no. 3 above. Also included in the March 22 telephone conference call were other topics of mutual interest related to the development of the Program Architecture. Enclosure 1 is a summary of the meeting minutes from that conference call.

Phil Altomare and Mike Lee reviewed with you the proposed line-in/line-out changes on items no. 1 and no. 3 above over the phone on March 23, 1989. Enclosure 2 is a summary of the meeting minutes from this conference call. At that time, they also informed you that they were deferring comment on item no. 2 until a broader NRC review could be solicited. Shirley Fortuna provided you with comments on item no. 2 in a letter dated March 28, 1989.

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Finally, enclosure 3 is the meeting minutes of our joint meeting of March 15 and March 16, 1989 to discuss the Center's planning activities for fiscal years 1989 and 1990. These meeting minutes have been jointly agreed to by John Linehan and Wes Patrick of our respective staffs.

Please feel free to contact me if I may be of further assistance to you in this matter.

Sincerely,

ORIGINAL SIGNED BY

Robert E. Browning, Director  
Division of High-Level Waste Management

Enclosures (3): As stated

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CNWRA

OFC: HLEN	: HLEN	: HLPD	: HLPD	: HLWM	: HLWM	:
NAME: MLee	: PAItomare	: JHolonich	: JLinehan	: BYoungblood	: RBrowning	:
DATE: 3.30.89	: 3/30/89	: 4/16	: 4/17/89	: 4/20/89	:	:

OFFICIAL CONCURRENCE RECORD

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ENCLOSURE 2

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NRC's Comments on "Actions Regarding NRC Comments on Program Architecture Process and Products" (draft dated March 17, 1989)

<u>Topic</u>	<u>Comment</u>
A1	<p>The Center has indicated that they will provide the revised 22-step Program Architecture process diagram and supporting explanation. Our understanding is that this will be in about seven (7) weeks from this writing (estimated due date is early May). We would like to see the revised drafts prior to finalization.</p>
B3	<p>The Center should be aware of recent developments as concerns the development of the Standard Format and Content Guide. Generally, in the preparation of the SFCG, there should be a correlation between it, the Standard Review Plan for the license application, and any uncertainties derived from the Program Architecture. These three concepts, in turn, should themselves be related to the pertinent regulations in 10 CFR Part 60, etc. We will dispatch the March 13, 1989 memorandum written by Joe Bunting on this subject to you.</p> <p>The use of the numbers 15A and 15B may misrepresent the respective sequence of the concepts "Regulatory Elements of Proof" and Technical Review Components" in the 22-step PA logic diagram. It is understood that this numbering system will not be used in the PASS data base.</p>
D7	<p>As previously stated, the term "functional role" refers to how the data fields and information contained in them will be used in PASS. At present, there are many interpretations as to what they mean and how they will be used. For example, does the term "essential expertise" (PASS data field #13) refer to that expertise needed to identify and resolve an uncertainty, identify an information need, or exercise a compliance determination method? As stated in your correspondence, the forthcoming user survey will clarify this question.</p> <p>The use of the term "cross-walk" referred to how one would navigate through the PASS data base (vis-a-vis the 22-step PA developmental logic). It is clear that some of the PASS data fields can only be completed following an off-line analysis of data in preceding PASS data fields. In this regard, it is understood that you will use three regulatory requirement topics that will "exercise" PASS to perfect the protocol that would be the so-called "decision making apparatus" (e.g. Chapter 19 of the QA Manual).</p>

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ENCLOSURE 2

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<u>Topic</u>	<u>Comment</u>
D2	Program Architecture process block #16 will consider only the CNWRA's costs at this time. NRC's program costs may be included at a later time after the system has been fully tested and operational using CNWRA data.
D3	<p>The conversations of March 15 and 16, 1989 concerning FY89 and FY90 staff activities indicated that initial emphasis on the PA mainstreaming of statutes and regulations pertinent to NRC's HLW program should first focus on 10 CFR Part 60, followed later by those statutes and regulations incorporated by reference in 10 CFR Part 60 as well as other regulations determined to have application to NRC's programs.</p> <p>NRC is interested in the rank-ordering which the Center intends to follow in its construction (loading) of the PASS data base. To this end, it would be beneficial for the Center to prepare a summary describing which regulations have application to NRC's programs and why.</p>

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ENCLOSURE 2

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NRC's Comments on "Recommended Program Architecture Procedural Revisions" (draft dated March 20, 1989)

<u>Page/Paragraph</u>	<u>Comment</u>
Subject -- PASS data field 15A, "Regulatory Elements of Proof"	
2/1	Add the phrase "and Performance Confirmation" at the end of the first sentence.
2/2	It was our understanding (telephone conference of March 1, 1989) that the Center will be modifying the text to utilize the term "demonstrate" in lieu of the term "proven."
2/3	Delete the clause "in order to retain the force of law."
2/3	First sentence - insert "existing" before "Regulatory."
2/3	Delete the last sentence ("When a Regulatory Text...use the language of the PURL.")
5/1	Delete the words "demonstration and" from the beginning of item (2).
Subject -- PASS data field 15B, "Technical Review Components."	
5/2	Second line - replace "support" with "review" and insert "support" before "a NRC determination."
6/2	Add the phrase "and Performance Confirmation" at the end of the first sentence.
Subject -- "Completion of the 22-Step Process...."	
9/2	To the end of item #6 add the sentence "If additional information is required before the PURL can be drafted, describe the concept and the intent of the PURL."
Subject - PASS data field 39, "NRC Uncertainty Reduction Method."	
11/3	Under items "a" and "b" ("attributes" and "preliminary rank-ordering"), suggest spelling out what "R8" and "R9" are.
12/1	First full paragraph, second sentence. Add add the sentence "If additional information is required before the PURL can be drafted, describe the concept and the intent of the PURL."

MAR 30 1989

WSEI NOTE NO.3

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NOTE FOR: The File

FROM: Michael Lee, Project Officer  
WSE&I Program Element

SUBJECT: MEETING NOTES FOR NRC/CNWRA TELEPHONE CONFERENCE ON  
"RECOMMENDED PA PROCEDURAL REVISIONS" -- MARCH 22, 1989

The following is a summary of the items of discussion between NRC and the CNWRA regarding the subject document (facsimile transmission dated March 20, 1989) submitted by the CNWRA under the general title "Program Architecture Comment and Resolution and Related Materials." The discussion concerned principally Technical Operating Procedure (TOP)-001-02 entitled "Program Architectural Database Work Instruction" (dated August 15, 1988) and proposed revisions to it. The revisions that were proposed by the Center are based on the "lessons learned" experience regarding the Program Architecture (PA) developmental process.

Those staff in attendance were as follows:

<u>NRC:</u>	RBrowning	PAItomare	<u>CNWRA:</u>	JLatz
	JYoungblood	JPearring		WPatrick
	JLinehan	DBrooks		AWhiting
	JHolonich	BBordenick		TRomine
	MLee			RADler

#### Discussion Point #1 -- APPROVAL OF TOP-001-02 REVISIONS

The proposed revisions to TOP-001-02 were approved subject to some minor line-in/line-out changes. The recommended line-in/line-out changes as well as other NRC comments on a second document ("ACTIONS RE NRC COMMENTS ON PA PROCESS AND PRODUCTS" -- draft dated March 17, 1989) submitted by the Center were agreed to be discussed on March 23, 1989.

#### Discussion Point #2 -- PROGRAM ARCHITECTURE DEVELOPMENT

This item of discussion concerned the 22-step Program Architecture developmental process. NRC requested that there be no "hold" provisions in "uncertainty" decision making as it relates to this process.

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MAR 30 1989

WSEI NOTE NO.3

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Discussion Point #3 -- NRC CONTACTS FOR THE REGULATORY REQUIREMENT TOPICS TO BE PA MAINSTREAMED

During the joint NRC/CMWRA staff meeting (March 15 and 16, 1989) on FY89 and FY90 staff activities, one of the agreements reached was that three regulatory requirement topics would be taken through the 22-step PA developmental process, and this requirement would be achieved as early as practicable. The NRC contacts to serve as the liaisons with the Center for the three topics agreed to are as follows:

<u>General Topic Title</u>	<u>NRC Contact</u>
Adverse Geochemical Processes	David Brooks (HLGP)
Substantially Complete Containment	Chuck Peterson (HLEN)
Erosion	Charlotte Abrams (HLGP)

NRC requested that the Center provide by April 6, 1989 a preliminary estimate of which additional statutes and regulations (e.g. non-10 CFR regulations) the Center would be examining in conjunction with those pertinent 10 CFR Part 60 requirements for the three topics selected.

Discussion Point #4 -- PA (AND PASS) USER SURVEY

One of the agreements reached during the joint NRC/CMWRA staff meeting (March 15 and 16, 1989) was that the Center would conduct a Program Architecture (PA) and Program Architecture Support System "user survey" in order to define the PA output display and hard copy report requirements. The Center indicated that it would commence with the initial phases of its survey as early as practicable.

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LPDR	CNWRA	LSS
ACNW		

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AME:MLee	MDC:PAltomare	:JHolonich	:JLinehan	:BYoungblood	:REBrowning	:
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