

MEMORANDUM FOR: Mary Mace
Contracting Officer
Division of Contracts, ARM

FROM: Shirley L. Fortuna
CNWRA Deputy Program Manager

SUBJECT: APPROVAL OF CNWRA RESEARCH OPERATIONS PLAN

Please notify the contractor that the Operations Plan for the Research Program Element is approved subject to the following mandatory changes:

1. Reference to Attachment 1 (e.g., Second Paragraph of Subsection 1.2; First Paragraph of Subsection 2.2.1) is incorrect and internally inconsistent with the elevation of Research to an Element which includes all five projects.
2. Modify the first paragraph of Subsection 1.2 as stated. After the words "Operations Plan is to" on the first line, add "1) initiate a broad based Research program at the CNWRA to be based on the prioritization of issues that have been identified in the Program Architecture (Research Project 1) and 2) implement..."
3. Add "for Project Res 2-5" to the title of Subsection 2.1.
4. Modify the first paragraph under Subsection 2.1 to convey the tone that since the Program Architecture is not yet developed, the development of the detailed Project Plans for Res 2-5 will follow the basic sequence outlined.
5. Add the following as the first task under Subsection 2.1, "* Relate the project to the (developing) Program Architecture to the extent practical."
6. Modify the present Task 1 under Subsection 2.1 as follows. "* Identify the information or product required as a result of performing the project. In the case of the Research identified by NRC this information is often contained in the Statement of Work which has been supplied by NRC."
7. Modify the 7 Steps Approach in Subsection 2.2.1 as follows:
 - a. Provide a more detailed explanation of Step 3.
 - b. Change the word "resolve" in Step 4 to "deal with".
 - c. Modify Step 6 as stated:
 6. Submit a recommended Overall Research Plan to the NRC developed from the Program Architecture including a) identification of the finding, issue, uncertainty and priority that is to be addressed by the project and reference the other related projects recommended to deal

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with the uncertainty and b) a recommendation section where the specific use of the information/capability is identified.

- d. Replace the words "an ongoing" in Step 7 with the word "the".

The last sentence of the paragraph following the 7 steps which are provided should be modified as follows "...cooperation with the NRC Offices of Research and Nuclear Materials Safety and Safeguards."

The 5 tasks under this subsection should be modified by adding 2 (1) and 2 (2) to task 2 as follows "2. Identify in greater detail the individual tasks and subtasks and include (1) a task for developing criteria for establishing whether NRC or DOE should conduct specific research and (2) a task to assist in the development of the technical basis to prioritize projects.

8. Modify Task 1 for Research Projects 2-5 to be consistent with comment 5 above.
9. Modify Subsection 2.2.2 to include the proactive purpose. Consider adding the following words at the beginning of the last sentence of the first paragraph "In order to be able to review DOE's anticipated license application for the Yucca Mountain repository, this..."
10. Modify Subsection 2.2.5 to include not only the "reactive" concept but the "proactive" concept as well. Suggest adding after the first sentence of the first paragraph a sentence indicating that the research could also result in the need for NRC to develop regulations, guides, specifications in a future License Application Standard Format and Content Guide or a Standard Review Plan, and staff analytical capabilities.
11. Modify paragraph two on page 17. Since the QA Manual may involve criteria other than "important to safety", we suggest you delete the second line "...defined as important to safety and will be derived from accepted QA practices." and add at the end of the third sentence "...modified as necessary to be consistent with the Center's QA Manual."

Please communicate the following general comment to the contractor on our review of the Research Operations Plan. It would have been nice if the specific objective of this operations plan had not been limited in the text to the five detailed plans for the projects which have been currently authorized. The plan could have addressed the Research Program Element and taken into account the need for updates to accommodate future projects.

The revised Research Operations Plan should be submitted to NRC on April 29,

CNWRA/APPROVAL RES OPS PLAN

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1988. If you have any questions, please contact me on X20427.

Shirley L. Fortuna
CNWRA Deputy Program Manager

OFFICIAL CONCURRENCE AND DISTRIBUTION RECORD

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DATE:

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