

FEB 10 1989

CNwRA880065/E17-E36

- 1 -

Mr. 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: COMMENTS ON REGULATORY REQUIREMENT TOPICS E17 AND E36

NRC's CNwRA Program Management staff and the Office of the General Counsel have reviewed regulatory requirement topics E17 and E36 (respectively entitled "Adverse Condition -- Geochemical Processes" and "Structures, Systems, and Components Important to Safety -- Protection Against Natural Phenomena and Environmental Conditions"), transmitted by your letter of November 23, 1988, and which were originally used to demonstrate fulfillment of Program Architecture development milestones A3 and A4 (collective short title: "Finalize PASS structure through WSE&I Process Block #15"). Some of NRC's preliminary comments on the E17 (in the context of the A3 and A4 milestones) and E36 examples were shared with you earlier during joint NRC/CNwRA technical and management meetings held on November 1, 1988, and January 10-12 and February 2, 1989.

Enclosed you will find detailed comments prepared following comparison of the information contained in the E17 and E36 regulatory requirement topic examples with Technical Operating Procedures (TOP)-001-02 and portions of TOP-001, revision 1. These comments fall under three general headings ("procedure," "content," and "format") and relate, respectively, to the TOP-001-02 procedure itself (as defined by Attachment A of TOP-001-02), the application of the TOP-001-02 procedure to the two regulatory requirement topic examples, and the overall presentation of the information derived from that procedure as it relates to the E17/E36 report format. The following comments are being submitted for your consideration as we are currently engaged in a dialogue with you regarding the approach, the content, the state of completeness, and expectations regarding the Program Architecture and in particular, Center products. Hopefully you find the comments constructive and will help to serve our joint goal of timely development of the Program Architecture.

In addition to the attached detailed comments, we do have a few general comments and they are listed below. You will find that some of these general comments track with NRC's initial review of regulatory requirement topic E17, which was transmitted to you on November 25, 1988.

Michael Lee, EB

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FEB 10 1989

CNWRA880065/E17-E36

- 2 -

1. It is believed that full compliance with TOP-001-02 has not been achieved owing to the quality and, in some cases, the absence of information in several of the E17 and E36 PASS data fields. As a consequence, we feel we have not received sufficient exposure to the "dynamics" of proceeding from one Program Architecture process block to another. Furthermore, we also have concerns about the effectiveness of the Program Architecture Review Committee (PARC) process in assuring completeness and quality of information in PASS. It is for these reasons that the two regulatory requirement topic examples were not distributed to the NRC staff for a broader, more detailed technical review.
2. A general impression is conveyed by the information presented in regulatory requirement topic examples E-17 and E-36 that additional focus needs to be given to the principle objective of the relational database that is presented in Section 2.3 of TOP-001-02, e.g., that it is to be "... the repository for the principle information necessary (a) to provide guidance and consultation for Department of Energy (DOE) precicensing plans and activities and (b) to develop and execute the overall NRC regulatory program for NWPA waste management activities" (emphasis added). Very little of the content of the E-17 and E-36 examples is presented such that it could readily be used to develop substantive guidance to DOE, or used by NRC staff in executing programmatic objectives. It is believed that the CNWRA needs to direct a great deal of additional emphasis on development of the database in such a manner that information is readily useable, for example, in the development of a Standard Format and Content Guide and a Standard Review Plan for the HLW program, as well as developing technical positions and rulemakings. For example, it may be beneficial to use NRC documents such as Regulatory Guides, NUREG's, prior Safety Evaluation Reports, and other documents that have application to NRC's HLW program and incorporate, as appropriate, any applicable information.
3. The format of presentation is somewhat cumbersome making the review of the material a somewhat arduous task. For example, it was difficult to follow the reporting format (e.g. structure) for PASS in relation to the TOP-001-02 instructions for the content of the individual data fields. Also, the grouping of material in logical sequences that include related EP's/NC's/IR's/UN's/UQ's/and NR's would improve the ease with which the report could be read and used.

FEB 10 1989

CNwRA880065/E17-E36

- 3 -

4. It has been noted on several occasions that the Center should take reasonable measures to ensure that it maintains a record of the evaluations performed and the conclusions reached with regard to the analyses associated with each of the Program Architecture development process blocks. At present, it is not always clear what the analyst's rationale was in performing the analysis. It is recommended, therefore, that the "notes field" feature of PASS be permanently maintained in the data base. Furthermore, as many of the concerns identified in the "notes field" could represent potential uncertainties (e.g. open items), it is recognized that a mechanism is needed to document consideration of them.

For example, in the development of the Program Architecture, regulatory requirement topics clearly represent the foundation upon which the 22-step Program Architecture development process is based. However, the procedure for developing (e.g. "grouping") the "suite" of regulatory requirements under a particular topic (see "work instruction 1-02-2" dated December 2, 1988) has not been documented. This documentation would allow a determination as to why certain regulatory requirements were added or omitted from a particular topic, which regulatory requirements are driving the program vis-a-vis the Program Architecture, and the relationships between the respective regulatory requirements.

We believe this documentation would correspond to the "analysis" that was performed by the Center in Program Architecture development process block No. 2. This information is needed in the "regulatory requirement note field" to provide the necessary insight into your analysis.

5. The legal staff has recommended that the title "elements of proof" (PASS data fields #14 and #15; pages 12 and 13 of TOP-001-02) be changed to a more innocuous term. As stated in our memorandum of February 8, 1989, we recommend the use of the term "regulatory elements of proof" and the addition of the term "postulated uncertainty reduction language."
6. Section 5.4.2 of TOP-001-02 (page 5) specifies that "elements of proof," process block no. 3 of the 22-step Program Architecture development process, will not be developed if a "regulatory uncertainty" is encountered. As applied to the E17 example, the implementation of this section of the TOP has effectively resulted in delaying the 22-step Program Architecture development process until the uncertainty is resolved. This particular procedure is not consistent with the Program Architecture development process diagram, as shown on page 3 of TOP-001. Also, an NRC decision point for resolution of uncertainty now appears to be needed. Furthermore, when delaying the process, there is no indication of how the development of the Program Architecture proceeds. How the center will proceed with the developing Program Architecture therefore needs clarification when reaching such a point.

FEB 10 1989

- 4 -

7. Although we believe that it is useful for the Center to take a comprehensive approach to identifying potential uncertainties per se, we would emphasize that in many cases no actual uncertainty may exist, or if one does, it may be easily remedied. Therefore, some care must be given to determining which of the potential uncertainties are selected for uncertainty clarification. In this respect, more attention needs to be given to PASS data field #46 (priority/ranking). Furthermore, consideration should be given to the use of the term "potential" or "preliminary" uncertainty rather than "uncertainty" alone.

The Office of the General Counsel (OGC) has recommended (and we concur) that the following prefatory language be incorporated into TOP-001-02 and all Program Architecture-derived products:

The Program Architecture Support System (PASS) and PASS-derived products are, pursuant to contract, being developed by the Center for Nuclear Waste Regulatory Analyses solely for the internal use of NRC's Office of Nuclear Material Safety and Safeguards, Division of High-Level Waste Management, as a management tool for planning and reviewing activities to be carried out under the Nuclear Waste Policy Act of 1982 and amendments, and related legislation.

The comments included herein are also to be considered applicable to the Program Architecture development milestone R7, "proof of system" letter report. Both E17 and E36 regulatory requirement topic data fields are an integral part of the proof of system demonstration. As stated by our memorandum (February 6, 1989), it is our intent to have selected staff, using "read-only" passwords (provided by you on February 7, 1989), exercise the functional features of PASS, including those features that were part of the R7 demonstration but not included as part of the E17 and E36 submittal. This will allow us to better review the system per se and to provide you with more meaningful user-oriented comments as to the desired features of PASS.

In closing, we have only been able to review regulatory requirement topics E17 and E36 because of your deferred production schedule for Program Architecture development milestones, including those Program Element milestones applying to regulatory requirement topic sets E1 through E4. We should discuss additional regulatory requirement topic reviews based on the schedule for completion of the remaining Program Architecture development milestones, which you recently committed (memorandum dated January 23, 1989) to provide. Unfortunately, the technical staff's heavy involvement with the review of DOE's Site Characterization Plan and other standing commitments by OGC will make scheduling of our limited staff resources even more difficult than encountered in the E17 and E36 review. To the extent that we can establish firm delivery schedules, our staff scheduling problems will be eased. After you have had an opportunity to review these comments, I recommend that we make arrangements to discuss them, either through a conference call or possibly a meeting to include the primary parties. This exchange should take place as early as practical so as to avoid any delays in the development of the Program Architecture.

FEB 10 1989

CNWR880065/E17-E36

- 5 -

We are cognizant and greatly appreciative of the effort that you and the CNWRA staff have expended in developing the Program Architecture. As previously noted, our comments are provided with the intent of improving the process and product of this developing system. Please feel free to contact either Mike Lee or myself if you have any questions.

Sincerely,

**Original Signed By**

Philip M. Altomare  
Program Element Manager  
Waste Systems Engineering  
and Integration

Enclosure: As stated

cc: Stuart A. Treby, OGC (Rulemaking Division)  
Bernard M. Bordenick, OGC (Hearing Division)

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FEB 10 1989

E17-E36 ENCLOSURE

- 1 -

PROCEDURE

Attachment A to TOP-001-02 "PA Relational Database Field Definitions and Contents"

1. The definition and content of PASS data fields #3 through #7, as discussed in pages 8-9 of TOP-001-02, are not consistent with the reporting format shown by the E17/E36 regulatory requirement topic examples. The TOP should reflect how the data fields will be used.

2. TOP-001-02 does not describe the meaning of asterisks (\*) associated with regulatory requirement citations. Do they designate all antecedent references to a statute/regulation number for a particular regulatory requirement?

3. It is not clear to the reviewers which "regulation" in PASS data field #2 (page 9 of TOP-001-02) is the primary regulatory requirement driving the regulatory requirement topic cited in PASS data field #8 (page 8).

4. It would be useful to incorporate into the PASS database structure regulatory requirement topic "titles." At present, it is not clear what the general topic of the regulatory subjects is per se based on an examination of the regulation [numbers] or the attendant "keywords." This is of particular significance as several of the topics are "composites" of more than one regulatory requirement citations. Also, it would be useful if the regulatory requirement topic "title" were repeated for all other "topic" fields associated with a regulatory requirement.

5. TOP-001-02 does not define the format (standard) to be used for citing pertinent bibliographic references. (Also see comment #1 under "Content--Specific/E36" comments.)

6. The term "applicable period" (PASS data field #10) needs further definition as there are many interpretations as to what this term means and how it is to be used in PASS. Because of the lack of clarity with regard to how this field is being used, the content of E17 and E36 is considered unclear at this time.

7. Recommend that PASS data field #23 (QA status) be permanently maintained in the data base, and that a "revision date" be included to reflect the distinction between when the information was originally compiled and when it was subsequently revised.

8. There is some confusion among several of the staff regarding how PASS data field #53 (note field) will be used. Is this the note field for the entire regulatory requirement topic or a note field for specific references to individual PASS data fields for any particular regulatory requirement topic?

FEB 10 1989

E17-E36 ENCLOSURE

- 2 -

9. "Essential" and "related" expertise data fields (PASS data fields #18 and #19, respectively) have potential use to both NRC and the CNWRA for planning purposes. However, consideration needs to be given as to how they will be used for planning.

10. The new title "regulatory elements of proof" replaces the old title "elements of proof" (PASS data fields #14 and #15). The definition itself (PASS data field #15, page 12 of TOP-001-02) is to be restated as follows:

"REGULATORY ELEMENTS OF PROOF are what must be demonstrated to support a conclusion that the REGULATORY REQUIREMENT has been met. REGULATORY ELEMENTS OF PROOF must be directly stated in the requirement itself. When REGULATORY and/or INSTITUTIONAL UNCERTAINTIES exist, POSTULATED UNCERTAINTY REDUCTION LANGUAGE must be developed.

REGULATORY ELEMENTS OF PROOF would include those conditions, specifications, criteria, or procedures which will be the standard by which specific evidence will be compared to evaluate the degree to which the REGULATORY REQUIREMENT has been met.

[CNWRA may amplify, as necessary.]"

Any other reference to "elements of proof" in TOP-001-02 (and TOP-001) must be amended to "regulatory elements of proof," and the TOP's changed accordingly.

11. A new concept is replacing "postulated elements of proof." "Postulated uncertainty reduction language" should read as follows:

"An identification by the analyst of what the rule would be revised to contain if the uncertainty were to be reduced through rulemaking. Thus, POSTULATED REGULATORY REDUCTION LANGUAGE would reflect the difference between what is written in the rule now and what would be there in order to ameliorate the particular REGULATORY, TECHNICAL, OR INSTITUTIONAL UNCERTAINTY if the uncertainty were to be resolved through rulemaking.

It should be noted that in postulating the missing information, no decision has been made on how to implement the reduction, e.g. rulemaking, technical position, or other NRC regulatory instrument.

[CNWRA may amplify, as necessary]"

TOP-001, revision 1

1. Recommend changing "elements of proof" title for Program Architecture development Process Block No. 3 in figure 1 (page 3 of TOP-001, revision 1) to possibly "regulatory elements of proof" (See item #5 on page 2 of the memorandum).

FEB 10 1989

E17-E36 ENCLOSURE

- 3 -

CONTENT

General

1. Several reviewers believe that the content of several of the PASS data fields (e.g. #9, #11, #13, #15, #16, #24, #25, #26, #27, #28, #29, #30, #35, #39, #41, #42, #43, and #53) do not track consistently with the review procedures (e.g. instructions) of TOP-001-02 or the specifications for the R7, R8, and R9 major milestone products which constrained the development of Program Architecture development process blocks #4C, #10C, and #15 (and associated PASS data fields) only with respect to technical uncertainties and uncertainty reduction methods.

These reviewers felt that the responses to the TOP procedure, as reflected by the information in the PASS data field, should "parallel" TOP as closely as possible. As a consequence, it is believed that the information contained in these data fields is not consistent with the direction provided by TOP. For example, the questions raised in 35a through 35i of TOP-001-02 should be responded to in a similar fashion in PASS data field #35 and be addressed, if need be, in the "note field" corresponding to PASS data field #35 (see next comment below).

If a particular PASS data field was not fully or only partially completed by the analyst, it would be useful for NRC (and the PARC) to understand why. In either case, the PASS data field itself should contain a reference to a note explaining why the field was not filled-out in accordance with the TOP instructions.

2. The use of the term "to be determined" in some data fields does little to provide NRC with insight relating to the nature of the analyses being performed by the Center. Based on the type of information presented, it is not possible to evaluate the applicability of information in these data fields. It would be desirable for the Center to indicate when this information might be available for review.

3. PASS data fields notes (#35 - uncertainty question) include locations for bibliographies (references) but none were provided. We encourage providing such bibliographies as early as possible. In this regard, we suggest consideration be given to revising TOP-001-02 to require a bibliographic reference be prepared for all appropriate PASS data fields.

4. Table 1 of the A3/A4 submittal indicates that PASS data field #47 (cost, schedules, etc.) has been utilized. It is not clear, based on the information submitted, that this data field has in fact been utilized.

5. PASS data field #25 -- "DOE Compliance Demonstration Method"

The text identifies "DOE information needs" but not the "DOE compliance determination method," as required by TOP-001-02.

FEB 10 1989

E17-E36 ENCLOSURE

- 4 -

6. PASS data field #38 -- "NRC Uncertainty Reduction Method Topic"

It is not clear how the keywords cited here support the substance of PASS data field #39 (NRC uncertainty reduction method). It would appear that those keywords aren't necessarily unique.

Specific -- E17

1. PASS data field #30 -- "Uncertainty Text" for UN1

a) A rationale should be provided as to how "a[n] adequate investigation is one that provides reasonable assurance."

b) Note that an adequate investigation involves the issue of materiality, i.e. if something doesn't make much of a difference, there's no need for a thorough study.

2. PASS data field #30 -- "Uncertainty Text" for UN2

a) When available, the cite should be to the Supplementary Information of the Federal Register Notice on the rule, and not to a secondary source such as a NUREG. NUREG's do not always contain all of the background information cited in Federal Register notices.

3. PASS data field #35 -- "NRC Uncertainty Questions"

It was felt that the TOP-001-02 procedure was not followed. The intent of this information is to provide a basis to formulate the solution to the "uncertainty" previously noted.

4. PASS data field #39 -- "NRC Uncertainty Reduction Method Text" for UN1/UQ1/NR1

a) Summary Approach -- The more important issue here is what is an "adequate investigation." "Taking into account" is not a separate issue nor a separate review criteria; rather, it is a factual question related to what DOE has done to investigate the issue and to what extent has DOE resolved it. The potential ambiguity is whether having achieved such a degree of resolution, has the investigation been adequate.

b) Postulated Elements of Proof -- The "postulated elements of proof" field is misleading. "Postulated [regulatory] elements of proof" (PREOP's) should be what the analyst would expect to see in the regulation in order to reduce uncertainty. In other words, PREOP's are the difference between what an analyst sees between the "elements of proof," as written, and what would be expected to demonstrate compliance with the regulatory requirement.

FEB 10 1969

E17-E36 ENCLOSURE

- 5 -

c) Postulated Elements of Proof -- It is stated that the proposed method to reduce the uncertainty is to "clarify the intent of the cited phrase." While certain methods of clarification are ruled out (OGC opinion, etc.), no suggestions are made for how the uncertainty should be clarified.

5. PASS data field #42 -- "Information Requirements"

It is not clear how the information presented here per se satisfies the intent of the TOP-001-02 procedure. What was expected are the specific facts, data, etc. that would be applied to a particular compliance determination method.

6. PASS data field #43 -- "Information Requirement Requestors"

It is not clear that the information supporting item "b" of the TOP-001-02 procedure for PASS data field #43 has been submitted.

7. PASS data field #53 (?) -- "Regulatory Requirement Notes"

a) Second full paragraph -- The basis for the statement "that only some of the adverse conditions need to be examined to determine whether they are present or absent" has not been provided.

b) Last full paragraph -- The first view stated appears correct, i.e. "the document authors intended to refer to only the favorable conditions listed in §122(b) as those that could ameliorate the presence of a given adverse condition.

8. Pass data field #53 (?) -- "Uncertainty Notes" for UN1

a) The discussion makes it difficult to determine how many and what the different interpretations are; we would suggest a clearer delineation of the different views.

b) Fifth full paragraph -- Is "adequately evaluated" to be interpreted in the same manner as "adequately investigated," i.e. reasonable assurance?

9. PASS data field #53 (?) -- "Uncertainty Text Notes" for UN2

a) Second full paragraph -- It is unclear as to what is "in contrast" in the text.

b) Second full paragraph -- The text states that "(This apparent inconsistency...;" it is not apparent what the inconsistency is, i.e., an adverse condition would significantly affect the ability of the repository to meet the performance objectives if it has the potential, in the context of other adverse conditions, to cause the performance objective to be violated; in which case a favorable condition or a remedy would be necessary.

FEB 10 1989

E17-E36 ENCLOSURE

- 6 -

c) Second full paragraph -- §60.122(a)(2) refers to performance objectives relating to the isolation of waste. However, the text only discusses system performance in §60.112; the text should clarify why the individual performance objectives in §60.113(a)(1) are not included in the discussion. See the definition of "isolation of waste" in §60.102(e).

Specific -- E36

1. PASS data fields #28, #30, #35, #42 and associated "Note Fields"

The information presented here does not consider prior NRC accepted means to resolve technical program needs identified in the regulatory requirement. Regulatory Guide 1.70 and 10 CFR Part 100 Appendix A which address the principle seismic, geologic, hydrologic, and meteorologic considerations that guide the NRC staff in its evaluation of the acceptability of sites and seismic design bases for similar Nuclear Power Plant considerations are not discussed. Suggest consideration be given to incorporation of applicable parts into all appropriate fields.

It is also noted that the "bibliography" section of all "note fields" associated with IR1 through IR8 are blank.

2. PASS data field #28 -- "NRC Compliance Determination Method Text"

Information presented appears equally appropriate for inclusion in PASS postulated elements of proof in that each entry appears to also address what DOE should demonstrate in a licence application. In addition, the entries appear to serve as general guidelines and general criteria defining the bounds of acceptable demonstration methods which tend to augment the sole "element of proof" presented. In this regard the entries appear to more appropriately address "what" must be demonstrated by DOE rather than "how" NRC will determine that what is required to be demonstrated has or has not been met.

Information presented is also insufficient to establish the methods that NRC will use to determine whether DOE has designed structures, systems, and components important to safety so that natural phenomena and environmental conditions anticipated at the geologic repository operations area will not interfere with necessary safety functions. While considerable information is presented addressing "what" NRC is to determine, no information is presented addressing "how" NRC is to make the determination itself. No information is presented related to those investigative or evaluative procedures that NRC would consider acceptable, if used by DOE. No information is presented relating to tests, methods, or any mode of inquiry that may be acceptable for NRC to address "how" NRC will determine compliance with the regulatory requirement. In this regard, the information contained in this field is inconsistent with the requirement of TOP-001-02 for this relational database field.

FEB 10 1989

- 7 -

### 3. PASS data field #30 -- "Uncertainty Text"

The "uncertainty text" for IR4 of E36 addresses a need to define an acceptable method to identify structures, systems, and components (SSC's) which are not important to safety. No uncertainty text was identified for IR3 which addresses identifying SSC's which are important to safety. It would appear that if uncertainties exist in IR4, they also exist in IR3. It would also appear that the identified uncertainty in IR4 could be appropriately addressed in terms of IR3 by addressing which SSC's are important to safety.

Suggest consideration be given to addressing this uncertainty in IR3 or by adding notes to PASS data field #30 for either IR3 or IR4 that would clearly present the rationale for addressing the identified uncertainty in any way you choose to recommend in the final version of Program Architecture for E36.

### 4. PASS data field #30 -- "Uncertainty Text"

The "uncertainty text" presented for IR1/UN1, IR2/UN1; and IR7/UN1 appears to address "regulatory uncertainty" rather than "technical uncertainty" in that the uncertainty addressed relates to identifying what environmental conditions, natural phenomena and combinations of event are covered by the regulatory requirement. If there is no regulatory uncertainty, i.e., no question as to "what" events, conditions, or combinations are to be addressed, then the fact that DOE has some work to do to complete its analyses does not cause the results of that work to be an uncertainty. Furthermore, when addressing how NRC is to review DOE's demonstration, the fact that NRC has work to do to complete its documentation of how DOE should present its application and how NRC will review it, does not in itself cause the results of that work to be uncertain. Clearly, the method can not be the subject of technical uncertainty until sufficient work has been done to define the specific method problems that generate the uncertainty. NRC methods related to determining compliance with similar regulatory requirements associated with 10 CFR Part 50 and 10 CFR Part 72 should be considered.

### 5. PASS data field #30 -- "Uncertainty Text"

Insufficient information is presented to support the need to address E36 uncertainties identified for IR5, IR6, and IR8. It would appear that these uncertainties would be addressed through the converse of the uncertainty addressed in IR1, IR2, and IR7. Suggest the notes for PASS data field #30 for IR1, IR2, and IR7 be expanded to address this point.

### 6. PASS data field #39 -- "NRC Uncertainty Reduction Method Text"

a) Postulated Elements of Proof -- See comments #4b and #4c under "Specific -- E17."

FEB 10 1989

E17-E36 ENCLOSURE

- 8 -

b) Postulated Elements of Proof -- The statement is made that postulated "elements of proof" are not required since there was no regulatory or institutional uncertainty for the regulatory requirement topic. It is unclear as to why the word "postulated" was used to qualify "element of proof." In any event, the statement is not quite accurate as it is possible to visualize stating elements of proof in those cases where there still remains a regulatory or institutional uncertainty.

7. PASS data field #42 -- "Information Requirements"

Information presented at this time appears inconsistent with the requirements of TOP-001-02. The content of all PASS data field #42 for E36 entries lack definition. TOP-001-02 requires definition to a level at which a study plan or a comprehensive test plan may be referenced. This inconsistency is especially noted in PASS data field #42 related to IR9 wherein the text does not follow the instructions for the required content of this field, as presented in TOP-001-02. It is desired that this field serves as a database for developing a Standard Format and Content Guide for use by DOE in its license application. As such, all PASS data field #42 entries, when compiled together, should provide a complete set of what DOE needs to address in their license application to allow NRC to determine if DOE is in compliance with the regulatory requirement. As stated in TOP-001-02, "when made available in the license application the actual information will constitute evidence regarding satisfaction of the associated (sic) regulatory requirement."

8. PASS data field #53 -- "NRC Compliance Determination Method Text Note"

The "note field" for PASS data field #28 appears incomplete. In this note field it is stated that the "rationale" for the strategy selected for compliance determination is to be addressed. However, the note field addresses for the most part items that should be provided by DOE, i.e. "what" DOE should submit, and not "how" the information submitted by DOE will be analyzed by NRC to clearly demonstrate regulatory compliance.

FORMAT

1. It is recommended that the parenthetical use of "field designations" (e.g. (PASS data field #9), etc.) following the title of a PASS data field should be used consistently. Such designations would aid the user in correlating the data fields in PASS to Attachment A of TOP-001-02 and the 22-step Program Architecture development process diagram.

2. It is not clear which "regulation" listed in PASS data field #2 for E17 correlates to the "regulatory requirement topic" cited in PASS data field #8. (See comment #3 in "PROCEDURE -- TOP-001-02.")

3. It is not clear what the distinction is between "regulatory agency" in TOP-001-02 (page 11) and "action agency" in PASS. Both refer to the same PASS data field (#11). (Also see PASS data field #13 ("related issues") and compare it to TOP.)

ENCLOSURES

- 5 -

ENCLOSURE 5