

FEB 15 1989

CNwRA880065/R7-A5-A6

- 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 PROGRAM ARCHITECTURE DEVELOPMENT MILESTONES A5, A6, AND R7

Attached you will find NRC's CNwRA Project Management comments on the letter report accompanying Program Architecture (PA) development milestone R7 (short title: PASS Proof of System) transmitted by your letter of December 7, 1988. As stated in our earlier discussion regarding this milestone, these comments are to be used in conjunction with the comments provided to you previously on major milestone R7 as well as your "lessons learned" conducted on January 20, 1989. The reference dates in question are December 1, 1988 for NRC's initial comments on R7 immediately following the briefing, and NRC's November 25, 1988 and February 10, 1989 review comments on 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").

In evaluating major milestone R7, we were reminded of the basic requirements for the Program Architecture that are defined in the contract. Given this reference as a baseline, the attached comments represent areas for which we feel there is need for additional clarification. These comments are to be collated with the other information that has been previously provided on this and other related PA development milestones.

To the extent practical, the four sets of comments on R7 as well as your recent self-critique of January 20 and the introduction of additional Program Architecture terminology (NRC's correspondence of February 8, 1989) should provide you with sufficient information to make those corrections you deem appropriate to automated data processing milestones A5 (short title: PASS organizational structure) and A6 (short title: Finalize PASS documentation), and thus to the functional features of the Program Architecture Support System (PASS). In reviewing these and the other comments that have been submitted, you will find that their principal focus concerns the approach, content, state of completeness, and expectations regarding PA-derived products.

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FEB 15 1989

CNWR880065/R7-A5-A6

- 2 -

We feel this document is an excellent compilation of the progress made in the development of the Program Architecture and the subsequent demonstrations of PASS. As we have discussed, however, time and the limitations of available information have not allowed completion of many of the PASS data fields nor the full "exercise" of the integrated data base. Accordingly, the completion of PASS data field sets should be of high priority such that the Program Architecture developmental process, and data field definitions and criteria are fully tested and accepted.

After you have had an opportunity to review these comments along with the other comments you have received, 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.

As always, we hope you find all the comments constructive and beneficial to our joint goal of timely development of the Program Architecture and PASS. Please feel free to contact me if you have any questions.

Sincerely,

Original Signed by

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

Enclosure: As stated

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FEB 15 1988

R7-A5-A6 ENCLOSURE

- 1 -

GENERAL COMMENTS ON PA DEVELOPMENT MILESTONES R7, A5, AND A6

1. There are several PASS data fields that need further clarification as there are many interpretations as to what they mean and how they will be used in PASS. Because of the lack of clarity with regard to the functional role of these PASS data fields, it is not possible to judge the appropriateness of the information that currently resides in these fields.

The PASS data fields in question are as follows:

<u>FIELD #</u>	<u>TITLE</u>
10	Regulatory Requirement Applicability Period
13	Essential Expertise
14	Support Expertise
21	Action Agency
22	When Action Required
34	Uncertainty Action Agency
47	Priority/Ranking

Also of concern is how one "cross-walks" from these seven fields to the other fields in PASS whose role is less questionable.

2. In the 22-step process for developing and maintaining the Program Architecture, NRC has had little exposure to the so-called "decision making apparatus" to be used to help define NRC's technical program. This would include the identification of programs offering the most promising reduction in the most crucial uncertainties, and the trade-offs between various alternative regulatory and programmatic approaches. At present, we believe this decision making apparatus corresponds somewhat to the attribute analysis being performed for major milestones R7 and R8, and would probably include any or all of Program Architecture process blocks no.'s 13, 15, 17, 18, and 22.

3. One of the fundamental requirements of the Program Architecture is to be able to demonstrate the vertical as well as the horizontal integration of the high-level waste program to the extent necessary (e.g. systems, subsystems). This would include, for example, the interfaces between the the repository, Defense Waste Production Facility, transportation, and the monitored retrievable storage facility, and a work breakdown structure. Based on the information at hand, it is not clear how this objective is being addressed in the proof of system.

4. Some users believe the user interface is not user friendly. (This call may be due to our lack of familiarity with PASS as a interactive data base.) A more user-friendly panel needs to be created whereby a user can get information from a menu, and subsequently generate reports.

ENCLOSURES

- 6 -

ENCLOSURE 6