



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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MAR 24 1993

Mr. P. C. Mackin, Deputy Technical Director
System Engineering and Integration
Center for Nuclear Waste Regulatory Analyses
6220 Culebra Road
San Antonio, Texas 78228-0510

Dear Mr. Mackin:

SUBJECT: TECHNICAL COMMENTS ON THE DRAFT USER'S GUIDE FOR THE OPEN ITEM
TRACKING SYSTEM (OITS)

NRC staff have completed a technical review of the June 1992 draft OITS User's Guide and our comments are enclosed. These comments are grouped into three areas relating to use and operation of the system, the User's Guide, and the standard report. Please begin the appropriate actions necessary to address these comments. As we have recently discussed, Mr. Robert Carlson will be available in person to explain any of these comments and discuss their resolution during his upcoming two week rotational assignment at the Center. As needed, I will also be available for discussion by telephone.

I have also enclosed the agreed to OITS loading plan prepared by the NRC staff in consultation with the Center staff. Both the Division of High-Level Waste Management and Center Operating Plans, and the Commitment Control Log should be updated to reflect both the milestones and administrative items listed herein.

Sincerely,

Robert Johnson
Program Element Manager
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure:

1. OITS Comments
2. OITS Load Plan

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OFC	HLPD	E	HLPD	E								
NAME	<i>Beardson/wd</i>		<i>RJohnson</i>									
DATE	<i>3/24/93</i>		<i>3/24/93</i>									

C = COVER E = COVER & ENCLOSURE N = NO COPY
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NRC COMMENTS ON THE OPEN ITEM TRACKING SYSTEM AND USER'S GUIDE

Comments on the Open Item Tracking System (OITS) are divided into three sections. The first section includes general comments on use and operation of the OITS software. The second section consists of comments on the OITS User's Guide. The third section addresses revisions to the standard OITS report.

1. Use and Operation of OITS

- a) Does OITS have the capacity for a better keyword search/index facility than that which currently exists (ie., such as full text search capability and/or on-screen indexing)?
- b) The system tends to "freeze" (ie., lock up, or take an inordinate amount of time to execute a function) often. Thus, something should be mentioned in the user's guide about this, and use of the pause key (or some other method) to rectify this.
- c) There appears to be no specific key(s) to enter, or instructions to follow, if a mistake is made, and the system locks-up. Thus, the individual must completely turn off the machine, and reenter the OITS program from the beginning.
- d) It is unclear how the user can access more than one, but less than all, of the data fields. All of the examples in the User's Guide access either only one data field, or all data fields.

2. User's Guide

- a) Revise the current "Table of Contents" to reflect all subsequent changes (See Attachment 1)
- b) Section 1.1, "Purpose," should be revised as follows: The Open Item Tracking System (OITS) is an automated data base management system for use by the Nuclear Regulatory Commission's staff to track the resolution status of regulatory, institutional, and technical uncertainties during the prelicensing and licensing phases of the high-level radioactive waste repository program. The purpose of this document is to provide the procedures and guidelines for the NRC and for the Center for Nuclear Waste Regulatory Analyses (CNWRA) staff to use in operating OITS.
- c) Section 1.2, "Background," should be rewritten following the outline below to summarize the past OITS developmental events leading to the operation of the system.
 - NRC staff have been identifying and tracking various types of technical, regulatory, institutional, and quality assurance open items for years using a variety of separate tracking systems.

ENCLOSURE 1

- As a result, there is a large backlog of existing open items that need to be consolidated and entered into OITS. Additionally, new ones are being identified on a continual basis.
 - The staff recognized the need for a unified, consistent process, in the form of an automated data base system, to track all open items and facilitate the staff's work. Such a policy was described in the Overall Review Strategy as one of the prelicensing review strategies.
 - Much work has gone into developing OITS, including the following events:
 - o development of a prototype system
 - o preparation of the draft user's guide
 - o demonstration of the system
 - o review and use of draft user's guide and system prototype
 - o preparation of final user's guide
 - OITS will continue to be refined, as needed, on a continual basis.
- d) Section 1.3, "System Concept and Approach," should be retitled "Scope and Content," and its content revised as follows:
- Explain that the user's guide gives procedures and guidance for input of open items and use of OITS, respectively.
 - Explain that while the guide only gives a general description of the process for identifying and resolving open items, it does not give procedures for identifying and resolving open items. The procedures for identifying and resolving open items are documented in NRC staff review plans and CNWRA technical operating procedures.
 - Describe the relationship or linkage among other data bases, such as PASS, reference data bases, etc.
 - Incorporate the attached markup of the existing text in section 1.4 (See Attachment 2).
- e) Section 1.5, "Assistance for OITS Users," should be renumbered 1.4, and the "Training" portion of this section revised to delete reference to the demonstration and prototype use - which has already been completed. Instead, say that initial training for all NRC and CNWRA staff will be provided, followed by periodic training for new staff and retraining for any other staff upon request.
- f) Prepare a new Chapter 2 entitled "Open Item Tracking Process and System Description" with the following subsections:
- 2.1 "Open Item Identification and Tracking Process" (NRC staff will provide the input to this section). Include the figure "Types of

Open Items" in this section, illustrating the various types of open items that are being tracked in OITS (See Attachment 3).

- 2.2 "System Concept and Approach," which should consist of a simple, and more concise description based on revising the existing text from Section 1.3.
- 2.3 "Primary Functions," which consists of existing text found in Chapter 3. Also, provide a detailed description of the following functions:
 - o store data - list and define each field for each type of open item so the user will know, from the beginning, the content of the data base.
 - o search, retrieve, and report data - list the standard reports and types of data included. Describe the types of custom searches and resulting reports available. Refer to the example reports in Appendix B.
- g) Prepare a new Chapter 3 entitled "OITS Input Procedures." The existing guidelines in Chapter 2 should be reformatted into a CNWRA technical operating procedure (TOP) and presented in the new Chapter 3. This comment is based on the principle that all input or updating functions of CNWRA data bases, such as OITS or PASS, should be controlled by TOPS, while "read only" functions are based on guidelines (established in Chapters 4 and 5 of this User's Guide).
 - For the new Chapter 3, "OITS Input Procedures," first explain that there are different procedures for loading and updating the different types of open items.
 - Use the specific name of the open item when referring to procedures for loading (eg., state specifically "Technical Uncertainties--DOE Concerns," instead of "open items loaded directly into OITS").
- h) Section 3.1, "Primary User Functions," should be retitled "Search and Retrieval," to be consistent with the content of the text, and incorporated into the new Section 2.3, "Primary Functions."
- i) Section 4.1.2.1, "Obtaining Userid and Password" - This section recommends that the user change his password during the first logon session, but fails to mention how to accomplish this.
- j) Section 4.1.2.3, "NRC Logon" - This section incorrectly identifies the PF2 key as the key to allow the user the "PASS-THROUGH" option. This function should be performed by using the PF4 key (on NRC keyboards).
- k) Section 4.1.3.1, "The CNWRA Main Menu" - This section incorrectly states that the PF4 key is active on the CNWRA menu. This key has no designated function (on NRC keyboards).

- l) Section 4.4, "Reporting Data," should refer to Appendix B, which gives examples of each type of report.
- m) Section 5.1.1, "Entering Multiple Search Predicates" - The description of using "C", "D", "B", and "A" is not sufficient. Some illustrative examples would be helpful.
- n) Section 5.1.4.3, "Complex Date Search Terms" - This function does not work with the example reports that are currently loaded into the system. The search screen is registering zero "hits" when the keyword "before" or "after" is entered, followed by a specified date.
- o) Section 5.2.2, "Downloading Saved Data Files" - This section is confusing, and should be reworded to simplify downloading instructions.

3. STANDARD REPORT

- a) The *Identification Date* of any open item should be defined as the date of the document that records the uncertainty (eg., date of the SCA, study plan comment letter to DOE, CNWRA report, SECY paper, approved CDS, etc.).
- b) A new field entitled *Source Type* should be added to the technical uncertainties report (ie., concerns with DOE's program), and should include the following:

<u>Identifier</u>	<u>Source Type</u>
SCA	Site Characterization Analysis of DOE's SCP
SP	Study Plans
PR	Semi-annual Progress Reports
TR	Topical Reports
IRR	Issue Resolution Reports
AO	Annotated Outline of the license application
TCR	Technical Report
MDR	Major Design Report
PAR	Performance Assessment Report
MP	Mission Plan
PDS	Project Decision Schedule
QA	Quality Assurance Document
WAP	Waste Acceptance Document

The *OITSID* should reflect these new *Source Type* identifiers.

- c) The *Source Document* field should include the full citation of the referenced document (in accordance with the NRC style manual). When applicable, ensure page numbers and specific comment, question, or objection number designators are included.
- d) Revise the *Specific Technical Type* field for the technical uncertainties report to also include "key technical uncertainties" and "other technical uncertainties."

- e) Revise the *Status* field to include the following terms which are more consistent with established NRC terminology.
- Regulatory/institutional, key technical, and other uncertainties report:
 - open
 - analyzed
 - resolved-draft
 - resolved
 - Technical uncertainties report--DOE concerns:
 - open
 - resolved
- f) Replace the word "Reduction" in the *Uncertainty Reduction Method Type* and *Rationale For Uncertainty Reduction Method Selection* fields with the word "Resolution." Add the following selections to the revised *Uncertainty Resolution Method Type* field.
- Regulatory/institutional uncertainties report:
 - major rulemaking
 - minor rulemaking
 - guidance--staff position
 - guidance--staff technical position
 - guidance--format and content regulatory guide for the license application
 - guidance--license application review plan other
 - Key technical uncertainties report:
 - guidance--staff technical position
 - guidance--format and content regulatory guide for the license application
 - guidance--license application review plan
 - analytical methods
 - research results
- g) Add a *Recommendation* text field (for NRC staff to complete) that will address recommended approaches to resolving technical uncertainties associated with concerns with DOE's program.
- h) In the *Cross Reference* field, delete the term "SRA," since the LARP number is presently the same as the SRA number.
- i) It should be clear that the *Citation* field should include only the applicable regulatory requirements, principally from 10 CFR Part 60. This means including in this field only those requirements for which the

open item should be considered in DOE's demonstration of compliance, and the staff's review and determination of compliance. This clarification should be more consistent with the LARP.

- j) Ensure in the *References for Uncertainty Text and Rationale* field that the entire reference is stated (in accordance with NRC style manual), including the full document date, and NUDOCS asession number, if possible.

REVISED TABLE OF CONTENTS FOR THE OITS USER'S GUIDE

1. INTRODUCTION
 - 1.1 Purpose
 - 1.2 Background
 - 1.3 Scope and Content
 - 1.4 Assistance for OITS Users
2. OPEN ITEM TRACKING PROCESS AND SYSTEM DESCRIPTION
 - 2.1 Open Item Identification and Tracking Process
 - 2.2 System Concept and Approach
 - 2.3 Primary Functions
3. OITS INPUT PROCEDURES

Reformat existing sections in Chapter 2
4. GUIDELINES FOR BEGINNING USE OF OITS

Remains the same
5. GUIDELINES FOR ADVANCED USE OF OITS

Remains the same

delete

NRC will have the CNWRA implement the approved design on the workstation hardware and software of their choice (either IBM DOS or Center supported IBM OS/2 based application) to meet policy, operating, and maintenance standards.

Insert A p. 1

SCOPE AND CONTENT

1.4 OVERVIEW OF THE USER GUIDE

computer data base management

It
This User Guide is intended to give inexperienced users immediate access to tools that will support them in their management of open items.

This User Guide consists of the introduction and sections organized as follows:

3 Procedures
Section 2.0 - OITS Input Guidelines

This section describes the OITS data base contents and provides guidance necessary for data entry into the OITS.

2 Open Item Tracking System and System Description
Section 3.0 - OITS Primary Functions

also includes a description of the system concept, approach and
This section identifies the intended users and primary functions that the OITS supports.

Guidelines for beginning use of
Section 4.0 - Quick Guide to Using OITS

This section:

1. Defines the minimum requirements for workstations for OITS.
2. Provides logon *guidelines* procedures for the SWRI IBM 4381.
3. Provides *guidelines* procedures for the beginning user to browse through an open item record or do a word search across the entire data base and then select and browse any of the open items found in the search.
4. Describes how to select and print reports using report menus and prescribed formats.

Guidelines for advanced use of OITS
Section 5.0 - Advanced Guidelines

This section completes the guidance necessary for the user to:

1. Save files while browsing for downloading to the user workstation for further use following the end of an OITS session.
2. Use additional OITS functions for searching and displaying information from the PADB.

LOADING PLAN FOR THE OPEN ITEM TRACKING SYSTEM (OITS)

1. PURPOSE

The purpose of this plan is to describe the loading of the backlog of open items consisting of previously identified uncertainties, including concerns about DOE's Site Characterization Program, into OITS. This plan will address the methodology, activities, responsibilities, priorities, training, and schedule for loading these open items into the system. A separate operating plan for OITS will be prepared to describe the future operations of OITS after the backlog has been loaded, sometime in FY 1994.

2. BACKGROUND

OITS is an automated data base management system that will be used by the staff to track the resolution status of regulatory, institutional, and technical uncertainties (including concerns about DOE's Site Characterization Program) during the prelicensing and licensing phases of a high-level radioactive waste repository program. The system will generate status and summary reports for each type of uncertainty to provide staff and management a current view of all open items.

The system itself, and the User's Guide, have already been developed. Both the System Description and User's Guide documents for OITS provide the staff with detailed information on the features and procedures for operating the system. These documents should be referred to when questions arise concerning the description or content of various data fields, or use of the system's software features for loading, searching, and generating reports.

The next step in making OITS fully operational is loading the backlog of existing open items. The staff has already identified and documented 54 regulatory and institutional uncertainties. Additionally, 198 technical uncertainties dealing with concerns about DOE's Site Characterization program have also been identified and documented in the staff's Site Characterization Analysis (SCA) of DOE's Site Characterization Plan (SCP) for Yucca Mountain. Existing and future open items in the form of questions, comments, and objections, resulting from the staff's review of DOE reports such as study plans, progress reports, quality assurance (QA) reports, waste acceptance process (WAP) documents, and the Annotated Outline (AO) for the License Application, will also be input and tracked by OITS.

3. METHODOLOGY

The method for loading the backlog of open item information into the OITS data base entails two phases. The first phase consists of directly loading data associated with those technical uncertainties that are concerns about DOE's Site Characterization Program. This includes concerns identified in the SCA, and concerns related to study plans, progress reports, AO documents, QA reports, and WAP documents. The second phase consists of loading information

pertaining to regulatory, institutional, and key technical uncertainty data, through linkage to the Program Architectural Support System (PASS) data base. The subsequent paragraphs will describe each phase in more detail.

Phase I:

During Phase I, the backlog of existing open items pertaining to concerns about DOE's Site Characterization Program will be directly loaded into OITS. This data is derived from staff comments, questions, and/or objections documented in one or more of the following source documents: SCA; AO comment letters; study plan comment letters for phase 1 reviews and detailed technical reviews; and progress report comment letters.

Concerns about DOE's Site Characterization Program dating prior to the publishing of the SCA (August 1989) will not be tracked in OITS. These concerns were either resolved by DOE in their submission of the SCP, or documented in the staff's SCA response. As appropriate, any follow-up documentation submitted by DOE in response to SCA or study plan concerns, and subsequent reviews by NRC of such documentation, will be input and tracked in OITS.

Each concern will be entered and tracked in the form of a standard open item report. The reports have data fields that identify, describe, and reference each open item. Text for certain data fields will be electronically loaded directly into OITS from existing computer files. Other data fields, where no computer data files exist, will require text to be manually input. An example of each OITS data field, and their definitions, is found in Appendix A of the User's Guide. Appendix B has examples of the various OITS reports.

SCA concerns are currently in the standardized open item report format (eg., comment, question, or objection), and exist in computer file form. Therefore, all pertinent data fields will be electronically loaded directly into OITS. Other data fields within the report will require text to be manually input.

Open items resulting from staff review of other DOE reports, such as study plans, various iterations of the AO, and progress reports, will have to be manually loaded into OITS.

Phase II:

Phase II consists of electronically loading uncertainty data into OITS from PASS. This information includes regulatory, institutional, and key technical uncertainties that have been identified through the Systematic Regulatory Analysis process, and approved by management. Details of the loading procedure for uncertainty data will be finalized subject to completion of the re-evaluation of PASS.

4. PRIORITIES

Due to the immediate need to support ongoing staff reviews of DOE's Site Characterization Program, and the fact that PASS is currently undergoing re-evaluation, emphasis will be placed on loading open items derived from Phase I source documents.

For Phase I, open items will be loaded into OITS, on a priority basis, according to the current storage medium and format of each source document. First priority of loading is for open items that are presently in computer file form, and are also in the standard OITS format. These open items will be electronically loaded. Second priority for loading data into OITS is for those source documents having concerns that require standardization in the open item format. Once this is completed, these open items will be manually loaded into OITS.

Based on the aforementioned loading priorities, the SCA open items will be input first. Open items from review of other DOE reports, such as study plans, various iterations of the AO, and progress reports will be loaded secondly, based on the earliest dated document.

5. ACTIVITIES AND RESPONSIBILITIES

Based on the priorities established above, the following steps delineate the activities and responsible personnel for loading the backlog of open items into OITS.

<u>Activities</u>	<u>Person</u>
1. Identify all Site Characterization source documents for OITS loading	C. Abrams
2. Review Site Characterization source documents for open items	C. Abrams
3. Fill-in missing text fields for each open item report (manually)	C. Abrams/ A. Garcia
4. Review each open item report for technical content and accuracy	Cognizant NRC technical lead
5. Transmit source documents in computer file form to CNWRA for loading	A. Garcia
6. Write program codes for loading source documentation and input open items into standard report format (electronically)	CNWRA
7. Review and perform QA checks on newly loaded open items	A. Garcia/ B. Carlson/ CNWRA

The NRC Project Manager for OITS is Bob Carlson. His counterparts on this project at CNWRA are Rawley Johnson and Sharon McFaddin. The NRC Project Manager should be the focal point for any questions by the staff concerning loading procedures, operation, and use of OITS, as well as any recommendations for improvement to the system. The CNWRA Project Managers are responsible for changes to OITS hardware and software features, as well as revisions to all associated user's manuals and documents.

6. TRAINING

Training on the use of OITS will be conducted in two parts, and administered by CNWRA. The first part consists of training selected administrative personnel on loading and revising information in the OITS data base. These individuals will be given a confidential user's I.D. and password, and will be responsible for inputting and revising all management approved data into the system. They will also have the capability to perform output functions, which entail searching, reviewing, and generating open item reports.

The second part of the training consists of familiarizing the remaining HLWM staff on use of OITS. These individuals will learn output capabilities only. Training on OITS for HLWM staff will occur in 1993.

7. SCHEDULE

The following schedule depicts the activities and dates for completion of OITS, data loading, and staff training. Major Milestones (MM) and Administrative Items (AI) are denoted by those activities that should be tracked in the CNWRA Operating Plan and Commitment Control Log.

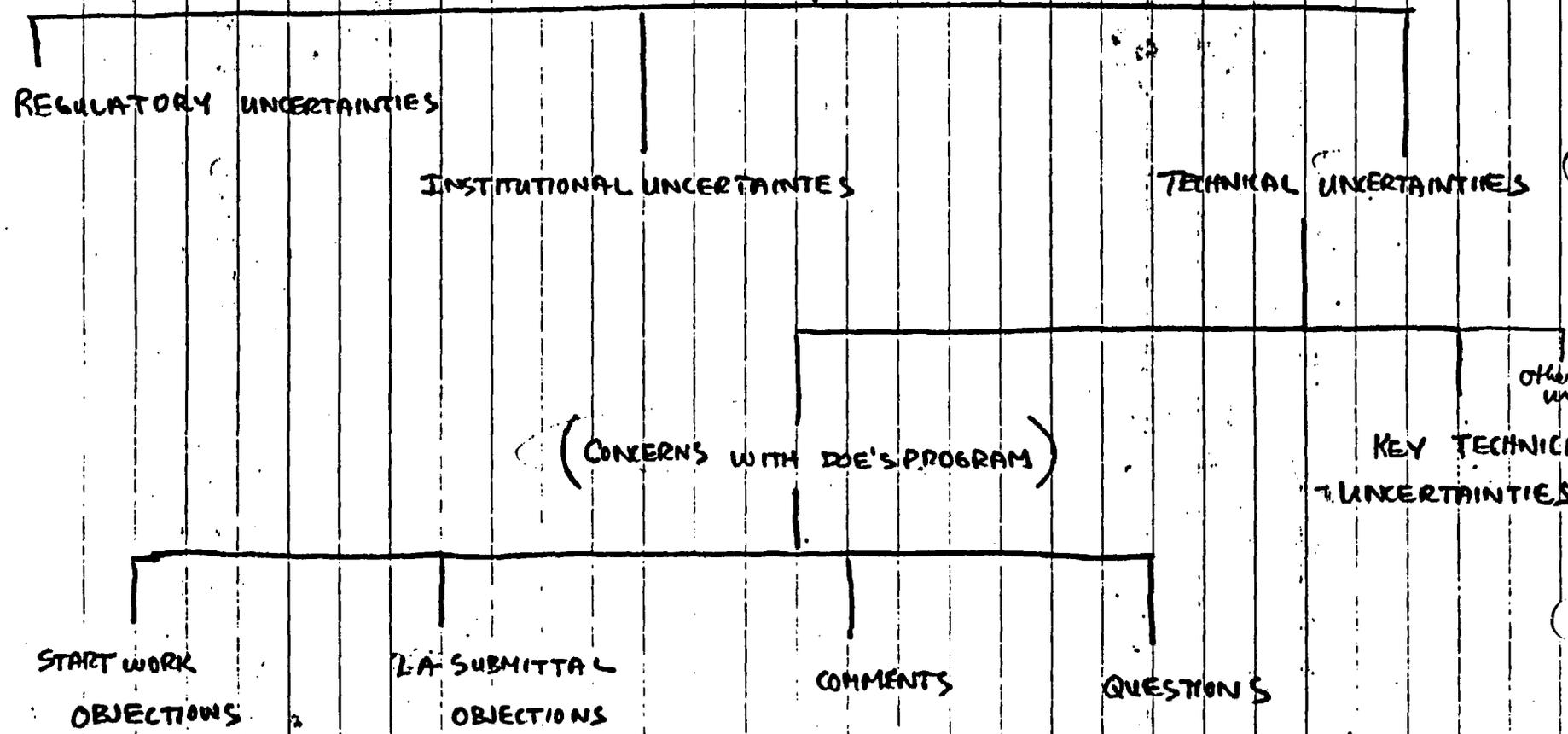
<u>Date</u>	<u>Description</u>
Feb 26	Complete draft system loading plan [NRC]
Mar 8	Complete final system loading plan [NRC]
Mar 12	Complete identification of Site Characterization source documents for OITS loading [NRC]
Mar 22	Transmit comments to CNWRA on prototype system and draft User's Guide [NRC]
Apr 7	Complete review of source documents for open items [NRC]
Apr 23	Conduct system readiness test [CNWRA-AI]

<u>Date</u>	<u>Description</u>
May 13	Begin Phase I system loading (incremental) [NRC/CNWRA]
May 17 - Sep 3	Complete missing text fields for each open item report [NRC]
May 21	Deliver final User's Guide [CNWRA-MM]
May 25	Train NRC and CNWRA administrative staff on system use (input personnel and selected output users) [CNWRA]
Jun 1 - Sep 15	Conduct review of each open item report for technical content and accuracy [NRC]
Jun 1 - Sep 15	Conduct QA checks on newly loaded open items [NRC/CNWRA]
Jul 13	Train NRC and CNWRA technical staff on system use [CNWRA]
Sep 15	Complete Phase I system loading [NRC/CNWRA-AI]

TYPES OF OPEN ITEMS

ATTACHMENT 3

OPEN ITEMS - 11/4/91



11/4/91 RLS