

MAY 06 1988

CNWRA/RESP PMPR NO 6

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Mr. John Latz, President
Center for Nuclear Waste
Regulatory Analyses
6620 Culebra Road
San Antonio, Texas 78284

SUBJECT: RESPONSE TO CNWRA'S PROGRAM MANAGER'S PERIODIC REPORT NO. 88-6

Dear Mr. Latz:

We have reviewed the CNWRA's Program Manager's Periodic Report No. 88-6 for the period February 20, 1988, through March 18, 1988. The following general and program element specific comments are provided:

General Comments:

1. A brief table of contents will be included in future periodic reports.
2. As agreed, the next periodic report will provide a discussion of Center plans for compensating for the loss of Dr. Duff and Dr. Anderson.
3. To ensure proper distribution of future periodic reports by NRC's Central File the subject line should be changed to include the words "CNWRA Program Manager's Periodic" in front of the word "Report."

Program Element Specific Comments

Quality Assurance

1. Please note for information purposes that written comments on the draft Quality Assurance (QA) Manual were also submitted by Mark Delligatti.
2. Additional information will be provided in future periodic reports regarding the activities undertaken to develop and implement the Center QA program aside from the QA Manual.

Special Project, Analytical Evaluations/Transportation

1. We'd appreciate the opportunity to review the outline of the development of the Center Five Year Plan.
2. A discussion of the changes in activities initiated on March 31, 1988, relative to streamlining the licensing process and the status of the natural resources special project should be provided in the next periodic report.

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Geologic Setting

1. The decision to make use of NWC and Itasca for the development of the Program Architecture should have a beneficial effect on the Center's ability to efficiently perform the activities required in the Geologic Setting Program Element (GS PE). These subcontractors are considered an integral part of the contract and their lack of use in the past could have contributed to the underspending rate of the GS PE and the recent relatively high incompleteness of the GS PE's input to the Program Architecture. The reason given for Itasca's preclusion from Program Architecture work is noted. In the future, however, if Itasca (or NWC) are needed for a Center assignment which might conflict with an NRC Technical Assistance assignment, it is suggested that the Center's management call such conflicts to NRC management attention for immediate resolution.
2. Your activities related to Section 5.2.1.2, Task 2, are outstanding: familiarization with the HLW literature; recruiting attempts; attending relevant meetings; getting NWC involved in GS PE work.
3. Regarding Section 5.2.2.1, Task 1, it appears the Intermediate Milestones 2 and 3 were almost completed on time. This reflects considerable progress made since reporting period #5 when the activities were less than 40% completed. Presumably, the assistance of SwRI staff contributed significantly to the catchup. The brief qualifications statements for these staff as well as discussions held on April 6, 1988, greatly clarified the approach to completing this task.
4. Additional discussion should be provided in the next periodic report on how heavier use of subcontractors beginning in Period 7 will get this element back on the Operations Plan track.
5. A careful review should be made of the need for developing contingency plans to accomplish or modify GS PE goals. Consideration should be given to the need to change one or more of the following: budget, schedule, deliverables, numbers of key and/or support personnel. A written response to this comment is not required at this time. Instead, a discussion will be conducted at the next management meeting.

Comments from the Division of Contracts will be provided in a separate letter.

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The action taken by this letter is considered to be within the scope of the current Contract No. NRC-02-088-005. No changes to cost or delivery of contracted services and products are authorized. Please notify me immediately if you believe that this letter would result in changes to cost or delivery of contracted products. Otherwise, no response to this letter is required.

Sincerely,

Original Signed By

Shirley L. Fortuna
CNWRA Deputy Program Manager

cc: Mary Mace

OFFICIAL CONCURRENCE AND DISTRIBUTION RECORD

LETTER FOR: Mr. John Latz, President
Center for Nuclear Waste
Regulatory Analyses

FROM: Shirley L. Fortuna
CNWRA Deputy Program Manager

SUBJECT: RESPONSE TO CNWRA'S PROGRAM MANAGER'S PERIODIC REPORT
NO. 88-6

DATE: APR 15 1988

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ORGANIZATION/CONCUREE	INITIALS	DATE CONCURRED
HLSE/SLFortuna/slh	<i>slh</i>	4/15/88