

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

SUBJECT: RESPONSE TO PROGRAM MANAGER'S PERIODIC REPORT NO. 88-5

Dear Mr. Latz:

We have reviewed the CNWRA's Program Manager's Periodic Report No. 88-5 for the period January 23, 1988 through February 19, 1988. A separate letter has been sent addressing the serious concerns we have relative to the status of Task 1 in the Geologic Setting Program Element. The following are our general and specific comments on the remainder of the report:

General Comments:

1. As agreed, future periodic reports will contain sufficient detail to allow the respective Program Element/Sub-element Managers to more clearly understand the nature and scope of activities which have occurred as well as planned efforts. The EBS and RDCO Program Element Sections are especially lacking in this area.
2. The rationale for the deviation from approved Operations Plans regarding the use of subcontractors has not been provided. For example, the approved spending plan for Itasca is \$5,448 and \$14,125 through the 5th period for EBS and RDCO PEs respectively. However, the periodic report indicates that no funds have been expended for the use of subcontractors. We have subsequently received a verbal explanation for the discrepancy; however, it is our understanding that written explanations will be provided in future periodic reports when large discrepancies of this type occur.
3. When activities are conducted in a period for which no activity was forecast such as Task 3 in the GS PE, it has been agreed that future periodic reports will explain or provide insight as to why the activity was performed.
4. The costed funds are over budget for three Program Element/Sub-elements, WSE&I, Transportation Risk Study and Special Projects and under budget in at least one Program Element. Future periodic reports which indicate that costed funds are substantially over/under budget should include a statement that variances from planned costed funds are, or are not, affecting planned work. If the statement indicates that the variance does not affect planned work, it will be assumed that remaining funds are adequate and schedules or quality of work will not be affected. If planned work is affected, a brief explanation of the effect should be provided.

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5. Please apprise the NRC staff of subcontractor activities by providing a brief narrative concerning the technical scope of task orders in the period that they are initially assigned to the subcontractor and a brief description, as appropriate, of activities performed in subsequent periods.
6. Although it was the initial intent of both the Center and NRC to visit the Center on April 1st as indicated on page 7, there has been general agreement that this date should be changed to April 5th and 6th.
7. The periodic report indicates that the Center has met with DOE staff and is planning further meetings. It has been agreed that the Center will inform (verbal communication is sufficient) the NRC Program Manager or appropriate Program Element/Sub-element Manager of all planned major programmatic meetings and the subject for discussion in sufficient time to allow us opportunity to attend.

Geologic Setting

1. It has been agreed that future periodic reports will provide a more detailed narrative summary of major programmatic meetings between NRC and ITASCA representatives and Center personnel to include results or status of objectives of the meetings.
2. This periodic report furnishes sufficient details about "the acquisition of a geochemist and a geohydrologist". However, it is understood that future reports will also include: a) some narrative to document the interfacing of the GS PE and Research in recruitment and hiring of staff in the two specialties of mutual need; and b) the percent of time new staff will spend in Research and GS Program Elements.

Waste Systems Engineering and Integration

1. As regarding the relational databases mentioned on page 7, Center Personnel are committed to preparing a description of the ADP system they plan to implement recognizing that events in the future may lead to changes or modifications. This plan, as previously discussed, should be provided to NRC on May 20th.

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

The action taken by this letter is considered to be within the scope of the current Contract No. NRC-02-88-005. 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 is required.

Sincerely,

Shirley L. Fortuna
CNWRA Deputy Program Manager

cc. Mary Mace

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

FROM: Shirley L. Fortuna
CNWRA Deputy Program Manager

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DATE:

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