



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAR 03 1989

MEMORANDUM FOR: Those On Attached List

FROM: Philip M. Altomare  
Program Element Manager

SUBJECT: COMMENTS ON PROGRAM ARCHITECTURE PROCESS AND CONTENT

We have recently completed a review of two regulatory requirement topics utilized by the Center in their Proof-of-System demonstration to the NRC staff. Our comments from this review have been provided to the Center for consideration in recommending improvements to the Program Architecture process and content. More recently, the Center raised several questions regarding reorientation of the Program Architecture (see attachments 1, 2, and 3) and, after consultation with management, legal and technical staff, were answered by my note of February 23, 1989 and a telephone conference of March 1, 1989 (attachments 4 and 5).

The Center is now proceeding to prepare changes to the Program Architecture development Technical Operating Procedures (TOP's) to improve its application and correct any deficiencies identified. We are proceeding on the assumption that all concerns have now been identified to the Center. If this is not the case, please provide a written statement of the concern and recommended resolution to Mike Lee as soon as possible and no later than Wednesday morning, March 8th.

I anticipate receiving a draft of a revised TOP-001-02 (Program Architecture Database Work Instruction) the week of March 12 and request that you plan to set aside approximately four hours to review and comment on this document. I would like to have our final comments on the document provided to the Center within a few days. We will periodically review the Program Architecture process and content, however, as the data base is loaded the ability to make changes diminishes and becomes more expensive.

A handwritten signature in dark ink, appearing to read "P. M. Altomare".

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

Attachments: (5)

Distribution List For Memorandum Dated: MAR 03 1958

W. Ott, RES  
J. Pearring, HLEN  
J. Cook, SGTB  
S. Coplan, HLGP  
F. Cameron, OGC  
B. Bordenick, OGC  
J. Moore, OGC  
M. Lee, HLEN  
J. Funches, NMSS  
S. Fortuna, HLEN  
J. Holonich, RLPD  
M. Delligatti, HLEN  
D. Brooks, HLGP

QUESTIONS RE REORIENTATION OF EP AND NR PROCEDURES

2/15/89

1. Proof of compliance with a Regulatory Requirement must include (1) the demonstration that the waste management system (or specific components) satisfy the requirements of the Regulatory Requirement (the Regulatory Elements of Proof) and (2) the demonstration that the evidence offered is technically adequate (Technical Components of Proof). Taken together, Regulatory Elements of Proof and Technical Components of Proof define "WHAT" must be demonstrated to prove compliance. A crucial part of the PA concept is the hierarchical definition of the logical interrelationships of "WHAT" is required for proof of compliance. It is highly desirable to provide that definition in a single, integrated logic structure. This provides the visibility necessary for clear understanding and application, and makes possible a consolidated input to the Format and Content Guide. To satisfy the above, Technical Components of Proof need to be contained in the same field as the Regulatory Elements of Proof with, of course, a means to clearly distinguish between the two. We wish to verify that this approach is acceptable to the NRC.

2. In the presence of a Reg UN, there are varying degrees of risk in pursuing the mainstream PA process. In some cases, risk may be unacceptable to NRC (e.g., Compliance Determination, Info Reqmts, cost and schedule estimates based on current GWTT rule could be valueless). This suggests the need for an early judgment of the significance of each UN, either by NRC or by the Center or by the Center with NRC review. How can this judgment of UN significance be expeditiously made?

3. If a FURL is prepared, is the development of PA process mainstream inputs to be based on the FURL or on the existing rule?

4. We understand that a FURL is limited to the section(s) that are expected to be impacted by rulemaking. Is this correct?

5. Suggested approach to avoid perception that the Center is making decisions re specific UN Reduction method (e.g., rulemaking):  
 [Note that the solution to question 2, above, could be included in the following approach.]

1. The Center would --
  - a. Define the desired outcome of the uncertainty reduction,
  - b. Identify reasonable alternative methods for achieving that outcome,
  - c. Summarize the merits and drawbacks of each alternative, and
  - d. Assess the attributes of the UNCERTAINTY (e.g., Importance, Time constraints, Durability, Impact on Site Characterization),
2. The NRC would assign weighting factors and establish the ranking of the UNCERTAINTY relative to other open uncertainties,
3. The NRC would select the reduction method to be used taking into consideration the nature of the UNCERTAINTY and its ranking,
4. The Center would complete the plan for the conduct of appropriate NR activities [i.e., complete sections c through f of Field 39 (process step 15) and process steps 16 - 22].

Is this approach acceptable? If so, how can we ensure expeditious completion of items 2 and 3?