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JUN 21 1984

MEMORANDUM FOR: Hubert J. Miller, Chief
Repository Projects Branch
Division of Waste Management

FROM: Robert J. Wright
Repository Projects Branch
Division of Waste Management

SUBJECT: FEWER DRAFTS OF PROJECT DOCUMENT

There are a number of ways in which the technical branches can help us keep to a minimium the number of drafts of a project document. Enclosed are: (1) an outline of the steps the BWIP section been following to prepare a project document: (2) a listing of what is required in a project document; and (3) the WMPB draft guidance on how to write comments.

Enclosures 2 and 3, if implemented by the technical branches, will help reduce the number of iterations between the technical branches and WMRP.

"ORIGINAL SIGNED BY"

Robert J. Wright
Repository Projects Branch
Division of Waste Management

Enclosures:
1. Steps in Preparation of a Project Document
2. Requirements for Preparation of a Project Document
3. Guidance on Comment Writing

OFC	:WMRP:BB	:	:	:	:	:	:
NAME	:RJWright	:	:	:	:	:	:
DATE	:84/06/20	:	:	:	:	:	:

Draft as of 84/06/11/ejc
Draft as of 84/06/14/mkg

GUIDANCE ON COMMENT WRITING

1. Completeness

Our review comments should contain sufficient information for a third party knowledgeable about the high-level waste program (i.e., someone besides the writer or addressee who may be thoroughly aware of surrounding details) to be able to follow what is going on. The comments must stand on their own and clearly and completely communicate specifically what problems we have with a document, program, or work element, etc.

The reviewer must avoid making unsupported statements or sweeping generalizations which require subsequent quantification or technical elaboration. Failure to provide a complete technical rationale may result in additional coordination and discussion with the staff reviewer in order to develop a complete, fair and defensible comment. The following paragraph illustrates an incomplete review comment as it appeared in an early draft of a comment document.

> The ESTP has not considered retrievability, sealing, waste package and other engineered barriers testing. The NRC has serious concerns about putting off tests that could be needed to support a License Application.

The more complete analysis, prepared for the final draft, addresses the significance and proposes a general approach for resolving the problem:

> The ESTP does not include testing of concepts on retrievability, sealing, waste package and other engineered barriers. The DOE should explicitly address and provide supporting rationale for what testing, if any, DOE considers is required in these areas to support making the findings that must be made during construction authorization proceedings against all of the performance objectives, requirements and criteria contained in 10 CFR 60. As indicated previously (most recently in NRC staff comments on the Mission Plan), the license application must be complete with respect to design information and supporting data and and analysis to make such findings. (see comment number 3 under Section C, "Comments on Geomechanics.")

The reviewer must recognize uncertainties in data and information that could point to several interpretations. For example, consider the following comment

from our review of a draft EIS on the disposal of decommissioned, defueled Naval submarine reactor plants:

> It is stated, in Section 1.H., that the activity concentrations were calculated on the basis of the reactor compartment volume, and that the "disposal package" would be in the category of Class B stable waste. The determination is questionable since 99.9 percent of the total radioactivity would be contained within the reactor pressure vessel. It would be more consistent with the pathway evaluations performed to determine the waste classification system limits, if the concentrations in such a heterogeneous waste form were based on the volume of the pressure vessel rather than on the total volume of the reactor compartment. Thus, it is possible that the waste could be classified as Class C waste (10 CFR 61.55). The waste classification analysis conducted by the Navy should be reevaluated in the final EIS to determine if additional disposal measures would be required at the disposal facility.

In raising concerns, making comments and criticisms, the reviewer should explicitly anticipate and, in the analysis, deal with the major counterarguments that might be made to the criticism. This must be done for fairness, objectivity, and also for self-defense---as a check, and for maximum effectiveness in delivering a point.

2. Be Concrete and Specific

The reviewer must clearly identify the underlying concern in a comment so that, in the response, attention is not given to something other than the real concern. Concrete, specific examples may be needed to support the comment. The guidance that we provide should be laid out in a logical, systematic fashion.

The following is another example of a review commment first as it appeared in draft form and then as it was written in the final version:

> The ESTP has omitted an important objective of exploratory shaft construction, namely: preliminary characterization of the reference repository location block (RRL). It is necessary for the test plan to provide an adequate discussion of this basic objective of the ES construction.

Now, the final version:

> The ESTP has omitted an important objective of exploratory shaft construction, namely: preliminary characterization of the reference repository location block (RRL). It is necessary for the test plan to

provide an adequate discussion of this basic objective of the ES construction. For example, the test block, including the lateral boreholes occupies an area of roughly 500 feet by 500 feet, i.e., one-hundredth of a square mile. However, the RRL block covers an area of approximately 20 square miles, and the underground portion of a repository would occupy about 3 square miles. The ESTP should discuss the adequacy of the test volume to establish the representativeness of the rock being tested. Discussions should outline a methodology of integrating the data from the ES tests and those from the surface boreholes, and any other existing data including those which can be demonstrated to be applicable from the Near Surface Test Facility, to characterize the RRL.

Explicit discussions should be made of the scenarios for which the ES test data may not be representative of the entire RRL block. For example, non-representativeness resulting from structural and stratigraphic inhomogeneities and unpredictable tectonic features in the basalt flows should be considered. (See Chapter 4 of NUREG 0960, Vol. 1 for detailed discusions on uncertainties about stratigraphic and structural discontinuities.) Alternative approaches to bound the uncertainties in the repository system performance should be presented.

3. Say Specifically What is Wrong

The comment should succinctly state what is wrong and what should be done to correct the problem. If there is missing information, or other deficiencies, the reviewer must provide specific guidance on what is needed. The reviewer must strike the right balance between providing sufficient guidance and not being overly prescriptive.

4. State What the Importance or Significance of the Comment is

Document review comments and criticisms must convey the significance of the concern being raised. The staff reviewer should indicate why the concern is important and what should be considered to resolve the concern. The comment should generally follow the facts/discussion/action format:

FACTS - a brief review of relevant past actions leading to a statement of the facts at hand. The comment should progress from general background information to a statement of specific facts that define the problem.

DISCUSSION - a discussion of all significant aspects of the problem that will bear upon the decision being made. Facts previously presented are analyzed.

ACTION - statement of action that is needed, that is to be taken, or that is recommended. Also, the conditions upon which action will be taken are summarized.

5. Structure of Comment Package

The comment package should be a complete product of the review, and should describe detailed and general comments. The comment package consists of the following linking elements:

a. Letter of Transmittal: This should contain a statement of subject and purpose of the comment document. Comments or concerns of special interest or significance should be introduced to the reader. Conclusions and recommendations may also be included. As an example, a copy of the BWIP ESTP letter is attached.

b. General Comments: A section for general comments should be included as an attachment to the letter of transmittal. These are major comments that relate to the overall document or program being reviewed, rather than to limited or specific aspects.

line up sentence

c. Specific Comments: Specific comments should also appear in a separate section and enclosed to the comment package. These are detailed comments and should identify the page and paragraph containing the concern being addressed.

d. NRC Contractor's Comments: When appropriate, the NRC contractors comments are enclosed as appendices for informational purposes.

6. Other Points

Comments should be completely developed and well focused, and only one concern should be raised in a paragraph. The structural organization of a comment should be as follows:

a. Develop one technical concern per paragraph.

b. State the concern at the beginning of the comment.

c. Indicate the significance of the concern.

d. Suggest what is needed to resolve the concern. This may require more than one paragraph.

The reviewer should avoid excessive use of jargon, and use the simplest words that will accurately convey the message. The comment should make sense not only to the technical specialist but also to the person who will make decisions based on the comment. Additional guidance and detailed information on writing style and organization are contained in NUREG-0650. Guidelines, issued to the staff for the preparation of the BWIP SCA, are also enclosed for guidance.

Enclosures:
1. BWIP ESTP Letter
2. SCA Preparation Guidelines

Document Name:
413.2/WRR/84/04/04/0/1

Requestor's ID:
MERNIEG

Author's Name:
Warren Rehfeldt

Document Comments:
GUIDANCE ON COMMENT WRITING 6/12/84

ATTACHMENT

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

Mr. O.L. Olson
Project Manager
Basalt Waste Isolation Project Office
U. S. Department of Energy
P. O. Box 550
Richland, WA 99352

Dear Mr. Olson:

Enclosed are our follow-up comments on the Exploratory Shaft Test Plan, BWI-TP-007 (ESTP) that was discussed during the BWIP/NRC workshop held in Richland on November 29 through December 2, 1983.

Our comments are presented in three sections. Section A includes general comments that address NRC concerns which apply to the overall ESTP and would be of interest to reviewers in all technical areas. Specific comments about the hydrogeologic issues in the ESTP are provided in Section B, while specific comments on geomechanics appear in Section C. There are no follow-up comments on geologic issues; geologic matters were discussed during the workshop, and comments were presented in the Summary Meeting Notes.

For your information, we have included our contractors' comments as appendices to the enclosure. As a matter of routine, these are placed in the public document rooms.

Except for coupled conditions, discussed in the next paragraph, we agree that the proposed test plan includes the tests that will be needed to make license application findings. However, we are not convinced that the amount of proposed testing will be sufficient as presented. The additional testing that could be needed cannot be settled until DOE establishes (1) how much performance will be expected from the various engineered and natural system components and (2) the degree of conservatism built into performance analysis. The need for additional testing could affect the ESTP test schedule. We note, in this connection, that the testing schedule makes no provision for contingencies.

We are concerned that the ESTP does not address the issue of coupled thermomechanical and hydrologic conditions associated with waste emplacement. This is a point that we have raised frequently over the past several years (see references identified in Item 3 of Section A). The ESTP does provide for mining of full scale openings over a limited area, and conventional tests are proposed to measure specific parameters relating to underground construction. However, neither direct testing of coupled behavior, nor demonstration that coupled behavior is unimportant, appears to be planned.

In our view, the approach to underground testing in the ESTP could be acceptable only if certain other conditions are met. These are the following:

a. In evaluating overall repository performance, no credit is taken for that portion of the rock that cannot be evaluated adequately without direct testing of coupled thermal effects.

b. The components of the natural system, for which performance credit is taken, are characterized adequately for evaluation of overall repository performance.

c. Components of the engineered system, such as the waste package, are designed with adequate conservatism to compensate for, or reduce, uncertainties with respect to the coupled thermal, mechanical, hydrologic and geochemical conditions that will be encountered. As examples of conservatism in design, we would cite such matters as: -- (1) limiting of thermal loading to temperatures that are low enough so that performance predictions can be reliably made; and (2) thickening of waste container walls to increase confidence in waste isolation.

d. As with all site charcterization tests, the tests that support the design of the engineered system are carried out under conditions that bound repository conditions. This means that the design of the tests takes into account the full range of hydro-thermal conditions that are expected to be encountered.

If you have any questions, please call me at FTS 427-4674.

Sincerely,

for R. J. Wright

Robert J. Wright
Senior Technical Advisor
Repository Projects Branch
Division of Waste Management

Enclosures:
1. Follow-up comments on the Exploratory Shaft Test Plan, BWI-TP-007 (ESTP)
2. Contractors' comments

WMHT r/f
NMSS r/f
CF
REBrowning
MJBell
JOBunting
[redacted] & r/f
PDR

FEB 16 1983

IO/JAC/83/02/I5/0

- 1 -

WM-IO

MEMORANDUM FOR: BWIP SCR Review Team

FROM: Hubert J. Miller, Chief
High-Level Waste Technical
Development Branch
Division of Waste Management

SUBJECT: GUIDELINES FOR SCA PREPARATION

Completing an SCA which adequately serves its purpose requires that we be our own toughest critics:

- Does it clearly and completely communicate to the DOE investigators specifically what problems we have with the programs they present in the SCR (work elements, logic diagrams and schedules)?
- Does it say specifically what we expect, where we have identified deficiencies or areas that are incomplete?
- Are we being fair, objective and accurate in our characterization and evaluation of the plans presented in the SCR?

Successfully completing the job requires strong self criticism -- it requires that we scrub very hard on our own work as we finalize the SCA.

The points identified in this document reiterate and elaborate on guidance given previously (i.e., memo from B. Wright to BWIP Review Team on I2-3-82, and note to BWIP and NTS Review Teams from H. Miller on I-5-83). Please consider these guidelines carefully and examine your respective chapters in the SCA for compliance with them.

/S/

Hubert J. Miller, Chief
High-Level Waste Technical
Development Branch
Division of Waste Management

Attachment:
SCA Preparation Guidelines

OFC						
NAME						
	2/16/83					

SCA PREPARATION GUIDELINES

These points must be observed in finalizing each of the SCA chapters. We must clearly project a sensitivity to these points through the way the SCA written. The SCA is an important tool for giving guidance to and communicating with DOE -- NTS, ONWI as well as Hanford -- on what we are expecting.

1. RELEVANCE TO LICENSING

   The entire analysis, from beginning to end, must be tied to information required in licensing assessments (10 CFR 60 assessments).

2. SUFFICIENCY

   We must be able demonstrate that what we are concerned about is only what is necessary and sufficient to ultimately make licensing findings. Bounding approaches may be appropriate and given limited time and resources we must be able to demonstrate that we are not asking for more than is necessary.

3. SENSITIVITY TO REAL WORLD FACTORS

   a. Limited DOE resources (funds and time).
   b. Phased SC investigations are appropriate and necessary.
   c. Flexibility is required to allow for "learning as you go" and adjustments. Adjustments will be made within each program area and in relative priorities among program areas.
   d. Lead times vary. Not all matters must be settled at the start of site characterization. Must be careful to identify what is on critical path.
   e. Must have complete program layed out in broad terms and settle details on at least first steps of SC investigations and long lead items.
   f. Can't piece meal problem. Systems approach, with minimum subsystem performance requirements met, is appropriate and necessary. Can't have narrow focus on isolated issues or areas where allowance for compensating factors is not made.

We should convey in our written criticisms a sensitivity to such factors as appropriate so that our comments are heard and not discounted as unrealistic.

4. COMPLETENESS OF REVIEW

a. If it is not presented in the SCR or in information formally submitted, "it does not exist" for purposes of this review. If important information is missing (even though we may understand it exists from discussions with DOE in workshops and the like) it should be treated as missing and a critical comment is in order.

b. Identification and Characterization of Uncertainties and Limitations

DOE programs must, to the extent practicable, clearly identify, characterize and account for uncertainties and limitations. Critically comment where this is not the case:

(i) Where it leads to lack of plans directly in program area involved.
(ii) Where it leads to lack of plans in other areas (e.g., scant information on sealing, betting that the outcome of other barrier investigations and performance assessments will be positive).

c. There can be no significant problems in the SCR that are not commented on.

The most effective and responsible way to be giving guidance to DOE is through comment on their plans. We can't have investigators wondering what NRC thinks of their program or their planned approaches as described in the SCR. Therefore, we must make sure, for example, that we are pointedly commenting on:

(i) identification and description of work elements
  - information needs (data and analysis) for work elements
  - priorities placed on work elements
  - mandatory measurement conditions
(ii) logic and sequencing diagrams
(iii) schedules

10/HJM/83/02/15/0

(iv) major specific points of approach to investigations such as bounding or simplifying assumptions made to the program feasible.

Make all of our criticisms through comments on specific items in the SCR. Talk to DOE through their document...don't go around it.

d. Must have complete program layed out in broad terms and settle details on at least first steps of investigations and long lead items.

5. COMPLETENESS/FAIRNESS/DEFENSIBILITY OF DOCUMENTATION

a. Say specifically what's missing

In many places we say that there is missing information or that plans are lacking. There can be no observation like this without specific guidance on what we are looking for. The obvious question, "What specifically does NRC want?" must be answered. We must say why the missing information is required/essential. We must convey what level of detail is needed and when. We must use concrete, specific examples to convey what we are looking for. We must be sensitive to the real world factors discussed above and, in what we write, clearly demonstrate that we are sensitive to these.

Furthermore, we must be able to say what we are going to do with the information once we get it. We must be prepared to take the next steps upon receipt of whatever information we get and be prepared to take positions on it.

We must decide, and effectively cover in some fashion in our analysis the following:

(i) When are data and information on critical path?
(ii) What procedures, plans, details do we need to see? When? At what level of detail?
(iii) We must be realistic about what level of detail we say ought to have been presented in the SCR. (Obviously we can't ask for all levels of detail to be actually in SCA). What should go in reference documents and plans?
(iv) What levels of detail do we expect to review and when? (Obviously we don't have resouces to review all in detail — some are not on critical path now).

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b. Raise and deal with counterarguments

In raising concerns, making comments and criticisms, we must actively try to make the counterarguments that would be raised by DOE. For example: "That's not important at this early stage in S.C.," or, "We can bound the problem," or "That concern does not relate to licensing performance assessments," or "That's beyond what is necessary and sufficient for licensing assessments." We must do this for fairness and objectivity but also out of self defense -- as a check of ourselves and for maximum effectiveness in delivering our point. We should explicitly anticipate and, in our written analysis, deal with the major counterarguments that might be made to our criticisms. We must actually try to see other views and clearly show in some way what we have done. (This is essential.) This is the most effective way to assure that our message will be understood. If DOE sees that their arguments are not lost on us -- that we have fully considered them and that our criticism or comment still applies -- they will be most apt to listen and able to understand.

c. Be direct -- Say what's wrong

We must clearly say when the SCR or DOE programs are deficient. In many cases, there is a long discussion about "what should be done" -- "what ought to be done" -- but no direct critical analysis of DOE plans. Don't leave reader guessing and having to infer that SCR is deficient on the point being discussed.

d. Avoid mischaracterization of SCR

There are a lot of comments about "plans that are lacking in detail" or "plans that don't exist" etc. We must check and double check to ensure that we have given credit to DOE for what's in the SCR. We must explicitly recognize those sections, plans, etc. which generally relate to the thing we say is missing or lacking. If there is something which on its face provides what we are asking for, we must explicitly acknowledge it and say why it is not adequate. There is an enormous amount of this in the drafts to date. We must, furthermore, do a sufficient job on this so that a third party reading the SCA and SCR together (without any help from us, but possibly with some help from those who are not sympathetic with, or stand to look bad with, SCA comments) gets the impression we carefully read the SCR, and fairly represented it.

IO/HJM/83/02/15/0

We must be very complete in our analysis, in giving full recognition to SCR plans and leave no doubt that we carefully/thoroughly reviewed it.

e. Clearly identify underlying concern

Frequently, to effectively make a point, we will argue by analogy/example or we discuss the symptom of a problem. While this is needed, make sure we get our bottom line concern clearly stated so that in response we don't get attention given to something other than the real concern. Also, if we are not complete enough in saying what our concern is, we will get an answer that on its face appears to deal with the comment as it is literally stated but not the real concern. Example: "Columbia River Basalt flows can be highly undulating and of uneven thickness" This point was made by using Umtanum Flow as an example with figures cited on its varying thickness. Unless we are complete, DOE's response might be that "We are not looking at the Umtanum anymore," instead of "We recognize basalt flows can vary in thickness and have a full program to characterize, and take account of, the varying thickness of any flow that we are investigating."

f. Give guidance

If you say something is wrong in SCR plans, you must tell what you are expecting to be done to fix the problem:

(i) minimum steps that should be taken, and/or
(ii) factors which should be considered and explicitly addressed in responding to the concern we raise.

Be as specific as you can. The guidance we give should be laid out in a logical, systematic fashion.

g. Strike proper balance in guidance

In identifying what's missing or giving guidance we must constantly struggle with, and demonstrate that we are struggling with, striking the right balance between (a) providing sufficient guidance and (b) not being overly prescriptive. The level of appropriate guidance is constantly changing as we gather more data and learn more. Therefore, this is a continuing question that we should be carefully weighing. We must put ourselves in the investigator's shoes and let

know we are doing this. We will then have the greatest chance for successful communication.

b. Don't criticize the past.

Do not waste effort criticizing the SCR from the point of view of where "they should have been" or what "they should have done". Criticism of past activities should only occur where it is important to criticizing where they plan to go from here.

6. COORDINATION

As with the review of the SCR, the development of our critical analyses and comments in the SCA must be well coordinated among technical program areas. Some repetition and redundancy is inevitable, and indeed desirable. However, there can be no conflicting messages.

7. SIGNIFICANCE

The concerns/comments/criticisms do not in many cases convey the potential significance of the matter at issue. It is not possible for the reader to tell whether questions being raised are serious (of first order concern), or low priority (second-third-order concerns). Some comments sound like they are "nice to ask" and correct", but not significant.

In connection with this, we must also — when questioning assertions of RHO — identify the nature of our concerns and distinguish between the following:

a. Cases where we think data and information actually support an opposite conclusion.

b. Things are so uncertain that no one or even several interpretations can be pointed to as most likely, and

c. Cases where we think the degree of certainty projected is beyond what can be supported but, all things considered, examining all direct and circumstantial evidence — the interpretations being pushed are most likely. I.e., we have actively considered all points of view and are more concerned about tone than we are that the interpretations are wrong.

There is a big difference in these cases, and too often we are not clear on which situation we think exists. We should be explicit.

8. CONSISTENCY IN FORMAT

In general, the structural organization of all Chapters of the SCA must stick to the two part Issues/PTans structure:

a. Issues - What are the potential licensing issues to be adequately identified and characterized?
b. Current Status on Issues - What are our criticisms/concerns/comments about the adequacy of the SCR characterization of issue status? Have they full/completely stated the issues and information needs? The RHO assertions and "lack-of-confidence" (e.g., groundwater travel time) type of matters are dealt with here.
c. PTans - What are the NRC's criticisms of the adequacy of the plans for obtaining the information needed to resolve the issues?

These elements (items a, b, and c above) fall within the Chapter(s) format as follows:

Chapter Section	Elements To Be Covered
-.1 Introduction	Background Type of Material Presented in the SCR Relevant Sections of 10 CFR 60 Relationships Among Issues
-.2 Principal Issues in the SCR	Item a. - Issues
-.3 Analysis of Issues	Item a. - Issues Item b. - Current status on issues
-.4 Analysis of the Site Characterization Program	Item c. - PTans

-.5 NRC Conclusions and Comments — Punchy summary of criticisms in previous sections

9. CONCISE CRITICAL ANALYSIS

Within the overall structural organization of the chapters, our criticisms, concerns and comments must uniformly be made according to the following simple rules:

a. State criticism/concern/comment generally at the beginning to focus discussion (in Chapter sections -.2, -.3, and -.4), then
b. develop it and say:

(i) What the criticism/concern/comment is about and why it's important
(ii) What kinds of things are needed or should be considered to remedy the problem

Don't include general discussions that are not needed to directly support the point we are trying to make.

c. No more than one concern developed at a time - don't mix up a bunch of separate concerns.
d. Comments/criticisms must be developed one at a time in logical order. They must stand out.
e. Analyses must be punchy — concerns must stand out.

10. UNSUPPORTED/UNQUALIFIED/SWEEPING STATEMENT

Avoid numerous sweeping generalizations that are going to muddy the waters. E.g.:

"considerable error"
"far exceed"
"serious complications"

We must be careful to explain ourselves. "How far exceed? etc.

11. AUDIENCE

The audience of the SCA is as follows:

1st The DOE investigator (text and appendices)

2nd The DOE manager/decision maker responsible for funding the projects (text)

3rd The public, including astute technical community (text and appendices)

4th The policy makers, including Congressional staffers, Commissioners, Commissioners' assistants, etc. (Conclusions, selected text)

ENCLOSURE 1
06/20/84

STEPS IN PREPARATION OF A PROJECT DOCUMENT
(PRESENT PRACTICE)

STEP

1. Draft is reviewed by BWIP section for scope, coverage, correlation with other project and NRC documents, emphasis on key points. This review usually leads to reorganization of the draft by the technical section.

2. Reorganized draft is reviewed by BWIP section for clarity of expression, construction of sections and paragraphs, consistency of usage throughout document. Numerous editorial suggestions are made.

3. Final tuning of text by technical section. Decision on cover letter contents made jointly. Preparation of draft cover letter normally done by BWIP section.

4. Final text is prepared by technical section; cover letter is prepared by BWIP section.

5. Concurrences sought from all contributors and appropriate section leaders. Minor requests for changes in document are occasionally made.

ENCLOSURE 2
06/20/84

REQUIREMENTS FOR PREPARATION OF A PROJECT DOCUMENT

- Technical quality
  Is it up to professional standards? Does the document make the proper points with appropriate emphasis and interrelationships among the points?

- Completeness
  Is the technical support for the points (comments, concerns, observations, positions) adequately documented? Is the document defensible with the technical rationale in place so as to handle counter arguments?

- Clarity
  Is the document organized to make its points effectively? Are the sentences and paragraphs clear and succinct? Is the grammer and syntax up to professional standards?

- Consistency
  Is the document consistent with current and past technical positions? (Note: any differences should be explained.) Is the document consistent with earlier statements and guidance to DOE (e.g., comments on DOE Mission Plan)? Is the document internally consistent?

- Form and content
  Are comments presented in an appropriate form? Are all needed sections covered, such as the purpose, background, scope, type of data reviewed (for data reviews), and relationship to previous documents (10CFR60, USTPs, and NUREG-0960)?

- Coordination
  Has proper coordination been made with other branches, RES, ELD?