



Department of
Comprehensive Planning
Nuclear Waste Division

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September 27, 1995

Nuclear Regulatory Commission
Mail Stop 16 H 3
Washington, DC 20565

Att: John Hoyle, LSS Administrator

Subj: **COMMENTS TO PHASE 2 LICENSING SUPPORT SYSTEM (LSS)
FUNCTIONAL REQUIREMENTS**

Dear Dan:

Attached are comments to Phase 2 of the Licensing Support System (LSS) Functional Requirements. I apologize for the delay.

The Clark County, Nuclear Waste Division (NWD) has appreciated the opportunity to participate with the LSS Working Group in the production of the Functional Requirements document. The NRC staff is to be commended for the progress made on the Functional Requirements study.

Since we are all tracking the proposed Department of Energy funding and legislation for FY 1996, it would be useful for the NRC to provide a status report to the LSSARP on expectations for LSS funding and program activities for FY 1996. Also, given the probable change in the direction of the Yucca Mountain program from site characterization to interim storage, it would also be important for the LSSARP to understand how this would affect the NRC's role in licensing, as well as the need for an LSS.

I look forward to discussing these issues with you.

Sincerely,

Dennis A. Bechtel
Coordinator

cc: Daniel Graser
attachment

lssdoc

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**CLARK COUNTY, NEVADA
COMMENTS TO
PHASE 2- LICENSING SUPPORT SYSTEM
FUNCTIONAL REQUIREMENTS DOCUMENT**

General Comments

1. Page numbers on the document should be added.

Specific Comments

1. **7.0 LSS Performance and Capacity Requirements.** The text notes an anticipated count of 30 million pages. I recall other estimates as high as 40 million pages. What is the basis for the estimate? Although I realize additional capabilities are generally a function of available funding, is there sufficient flexibility in the design of the system to account for an underestimate of the numbers of documents generated? Define the term E-Sized documents?

2. **LSS2-064 (Availability).** Except for expected regular maintenance downtime, and given the relatively short time (3-4 years) for license application review (an issue which, of course, may change because of the proposed interim storage legislation), it would seem that the system should be available for use 24 hours a day, 6 or 7 days a week. The ability of the general public to access the system may, however, be limited to the access time of the building in which the LSS workstation is housed. (e.g. If the system available for the public were in a library in Las Vegas, for example) This may be unacceptable to some stakeholder groups.

3. **Table 9-1 (Allocation of User Types to Access Location)** While there will be several workstations physically located within the City of Las Vegas (e.g. the Clark County Government Complex, the City of Las Vegas City Hall), there will be others located in Clark County, but outside of Las Vegas (e.g. Henderson, North Las Vegas). The wording in the table should be changed to reflect the fact that all workstations will be within Clark County.

Table 9-1 should also be modified to add the other seven counties designated as "affected units of local government" by the Department of Energy. (Churchill, Clark, Esmeralda, Eureka, Lander, Lincoln, Mineral, Nye, and White Pine in Nevada, and Inyo in California).