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Office of Civilian Radioactive Waste Management

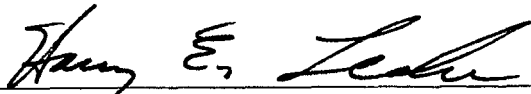
***OFFICE OF CIVILIAN RADIOACTIVE WASTE
MANAGEMENT LICENSING SUPPORT NETWORK
COMPLIANCE ASSURANCE PLAN
FOR DOCUMENT PROCESSING***

Revision 0

May 2004

*U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Las Vegas, Nevada*

Preparation:

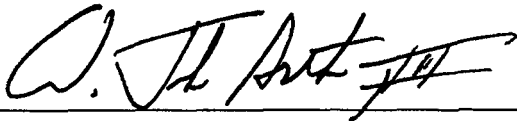


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5-25-04

Date

Approval:



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CHANGE HISTORY

<u>Revision Number</u>	<u>Interim Change No.</u>	<u>Effective Date</u>	<u>Description of Change</u>
0	0	05/25/2004	Initial issue

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ACRONYMS

CACI	CACI-Commercial, Inc.
DOE	U.S. Department of Energy
LSN	Licensing Support Network
NRC	U.S. Nuclear Regulatory Commission
OCRWM	Office of Civilian Radioactive Waste Management
OGC	Office of the General Counsel
RTM	Requirements Traceability Matrix

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1. BACKGROUND

The Office of Civilian Radioactive Waste Management (OCRWM) is currently preparing to apply for a license from the U.S. Nuclear Regulatory Commission (NRC) to construct a geologic repository for the storage of high-level radioactive waste at Yucca Mountain, Nevada. NRC regulations require that the U.S. Department of Energy (DOE) make available, in advance of submitting its License Application, documentary material as specified in 10 CFR 2.1003 for inclusion in the Licensing Support Network (LSN). Additionally, the DOE must certify, in accordance with 10 CFR 2.1009(b), that it has established and implemented procedures to meet the LSN requirements of 10 CFR 2.1003, and that the documentary material specified in 10 CFR 2.1003 has been identified and made electronically available. The DOE must provide an initial certification to this effect and an updated certification at the time the License Application is filed. CACI-Commercial, Inc. (CACI) has been selected as the litigation support contractor to assist the DOE in this effort.

DOE's initial and updated certifications will be based, in part, on the *OCRWM Licensing Support Network Certification Plan for Document Processing* (OCRWM 2004). As reflected in that plan, the DOE has taken numerous actions to properly conduct the processing of potentially relevant documents and loading identified documentary material on the DOE LSN server. The approach and basis for certifying that DOE meets NRC LSN requirements includes: (1) procedure development, training, and implementation as required by 10 CFR 2.1009; (2) implementation of a production process; and (3) verification of procedure implementation through the certification by CACI managers. Additionally, Compliance Assurance Reviews of the processing of potentially relevant documents and identified documentary material will be conducted as specified in this Plan.

2. PURPOSE AND SCOPE

The purpose of this document is to define the activities that will comprise the Compliance Assurance Reviews for document processing. Compliance Assurance Reviews will be performed to verify that the processing of documents and the loading of the documents into the LSN were consistent with the regulatory requirements and to identify any problems that should be addressed. Any findings from these reviews will be shared with CACI and the DOE LSN Project Manager. After the initial and updated certifications, additional Compliance Assurance Reviews will be conducted to verify that newly submitted potentially relevant documents continue to be properly processed and identified documentary material is loaded on the DOE LSN server.

3. CERTIFICATIONS OF COMPLIANCE BY AFFECTED ORGANIZATIONS

The DOE certifications will have a basis, in part, in certifications by CACI that the specified documents produced by affected DOE and contractor offices have been processed to satisfy the requirements of 10 CFR 2.1003. These CACI certifications will address the hardware and software used for the DOE LSN and the principal document categories that underwent processing, as described below.

4. COMPLIANCE ASSURANCE REVIEWS FOR THE DOCUMENT PROCESSING

The purpose of the Compliance Assurance Review of document processing is to evaluate whether the documents produced to CACI in response to the memorandum from the DOE Office of the General Counsel (OGC), "Screening and Processing of Licensing Support Network Documentary Material" (Otis 2003), are processed and loaded onto the DOE LSN server in a manner that satisfies the applicable regulatory requirements. CACI's certification will be supported by certifications from the CACI managers responsible for the processing of each of the seven document categories and for the hardware and software used in developing and hosting the DOE LSN. Compliance Assurance Reviews will provide additional support for this certification by reviewing and documenting the processing of each of these document categories and the hardware and software used for DOE document processing, including the DOE LSN server.

4.1 AFFECTED ORGANIZATIONS

The organization subject to Compliance Assurance Reviews for the processing and loading of documents is the U.S. Department of Justice Mega 2 Automated Litigation Support LSN contractor, CACI.

4.2 COMPLIANCE ASSURANCE PERSONNEL

The Compliance Assurance Reviews will be conducted by personnel from CACI. Affected personnel from CACI will include designated Certification Coordinators for each document category, CACI Deputy Directors, the CACI LSN Quality Assurance Manager, and the CACI Certifying Official.

4.3 SCOPE OF REVIEW

The Compliance Assurance Reviews will be conducted on the procedures and software used by CACI to process the seven principal categories of potentially relevant documents and the process of loading the LSN. These categories for which reviews will be conducted are:

- Record Information System/Records Management System
- Legacy paper collection
- Other paper documents
- Files on electronic media (including relevant files on individuals' hard drives and central servers but excluding databases)
- E-mail collections
- Electronic databases
- Software
- Hardware and software used for processing and loading the LSN.

The approach to be used for providing added assurance that the processing of documents and the loading of the documents into the LSN were consistent with the regulatory requirements will be a review of the status of relevant items in the Requirements Traceability Matrix (RTM). The RTM is a table of conditions to be satisfied and activities to be performed that were compiled from key LSN documents such as 10 CFR Part 2, Subpart J; the LSN Guidelines; and the Baseline Design Requirements Document. RTM items relevant to the processing of each category of potentially relevant documents and the hardware and software used for processing and loading the DOE LSN server will be identified and the status of each RTM item will be determined through compliance assurance reviews.

The tracking of status for relevant RTM items will be used to provide assurance that actions appropriate for the initial and the updated certifications have satisfactorily been taken. The status of each relevant RTM item will be documented and incorporated into the certification packages submitted to the DOE.

4.4 SCHEDULE

The items supporting the initial and updated certifications are to be documented by the target dates indicated below. The close-outs and interim actions will be described in the Compliance Assurance Review reports related to the processing of potentially relevant documents.

June 7, 2004 Complete the Compliance Assurance Reviews supporting the initial certification for the document categories and for hardware/software, and provide them to the DOE LSN Project Manager, OGC, and the DOE Certifying Official.

November 19, 2004 Complete the Compliance Assurance Reviews supporting the updated certification for the document categories and for hardware/software, and provide them to the DOE LSN Project Manager, OGC, and the DOE Certifying Official.

4.5 DOCUMENTATION

A written report about the status of RTM items relevant to each category of documentary material and the LSN hardware and software will be prepared from the Compliance Assurance Reviews. Any actions that appear necessary, based on the Reviews, will be identified to CACI management at that time. The Compliance Assurance Review reports will be provided to the DOE LSN Project Manager, DOE OGC, and DOE Certifying Official in the certification package containing the CACI certifications, as described in Section 7 of the *OCRWM Licensing Support Network Certification Plan for Document Processing* (OCRWM 2004).

5. REFERENCES

5.1 DOCUMENTS CITED

Office of Civilian Radioactive Waste Management (OCRWM) 2004. *OCRWM Licensing Support Network Certification Plan for Document Processing*. REV 0, May 2004. Las Vegas, Nevada: Office of Civilian Radioactive Waste Management.

Otis, L.L. 2003. "Screening and Processing of Licensing Support Network Documentary Material." Memorandum from L.L. Otis (OGC) to governmental agencies on the distribution list, May 5, 2003. ACC: HQO.20030610.0012.

5.2 CODES, STANDARDS, REGULATIONS, AND PROCEDURES

10 CFR (Code of Federal Regulations) 2, Subpart J. Energy: Rules of Practice for Domestic Licensing Proceedings and Issuance of Orders. Readily Available.

Licensing Support Network Guidelines. U.S. Nuclear Regulatory Commission. May 2003. Readily available.

LSN Baseline Design Requirements Document. U.S. Nuclear Regulatory Commission. Release 1.0 (draft), June, 2002.