



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

OFFICE OF THE
SECRETARY

May 12, 1995

MEMORANDUM TO: Arnold E. Levin, LSS Administrator
FROM: John C. Hoyle, LSSARP Chairman
SUBJECT: LSSARP RECOMMENDATION RE LSS RULE

At its March 22-23, 1995 meeting, the LSS Advisory Review Panel discussed language in 10 CFR Part 2, Subpart J (the LSS rule) relating to the processing of electronic information using computer hardware, software and procedures. It was noted that the LSS rule contains certain language which, although appropriate in 1989 when the rule was promulgated, refers to older technology and standards that would limit current cost-effective design of the LSS. For instance, terms used in the rule such as ASCII, terminal, dial-up, electronic mailbox and thesaurus refer to aspects of technology that are much broader and varied now than they were when the rule was developed.

The Panel recommends that the Commission, in interpreting provisions of the LSS Rule containing such technical terms, be guided by the underlying functional requirements and intent of these provisions in order to be able to avoid the limitations of outmoded technology. These provisions of the LSS Rule should be used as guides to intended functionality rather than absolute mandates for a particular technology.

The Panel also recommends that DOE proceed with this understanding unless it hears otherwise from the Commission.

cc: Hugh Thompson, Deputy Executive Director
for Operations, NRC
Karen Cyr, General Counsel, NRC
Claudia Newbury, Yucca Mountain Site Characterization
Office, DOE