



Department of Energy  
Washington, DC 20585

January 10, 1992

Mr. Gerald Cranford  
Director, Information Resources Management  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: LSS Concept/Design Alternatives Summary

Dear Jerry:

We have reviewed the materials provided at the LSS Technical Working Group meeting of January 8, 1992, and have the following comments.

General

I voiced concern during the meeting that we are now postured as examining and recommending for further consideration by Chairman Selin, John Bartlett and the LSS Administrator all technically feasible alternatives to the original SAIC design regardless of ramifications. However, we have not returned to study cost saving alternatives that we initially tabled from earlier consideration because they were so far from the spirit and intent of 10 CFR 2.

At the same time, we all seem to agree that the elements characterized as "LSS Budget Reduction" are not cost saving, but cost reallocations, and an argument could be made that some, in fact, add cost. Most of the items being actively considered merely move the costs to other organizations' budget requests, yet result in essentially the same magnitude costs to be charged against the Nuclear Waste Fund.

Given this, it is dismaying to realize that we have not studied real cost reduction opportunities to the same degree that we have the cost reallocation items. Granted, this is with perfect "20-20 hindsight", and, does not take into account the inherent limitations imposed by the initial rush to meet a November deadline. As a result, after almost four months, we appear to have ignored the opportunity to cost out:

- the run-time CD ROM approach originally broached by OCRWM to OLSSA in July of 1990, or, any other innovative dissemination strategies;
- the true saving that could be achieved if we did not include the full text for every textual document; or,
- the cost impacts of new search and retrieval products that could potentially reduce the need (and very substantial costs) for meeting 99.98% accuracy of ASCII text.

Much mileage has been gotten from the assumption that all of these benefits (reductions/reallocations) can be derived from reuse of InfoSTREAMS technology. Conversely, what if InfoSTREAMS fails? After four months, we have not at all examined any contingency approaches if it does fail.

Comments on the Chart "LSS Concept/Design Alternatives Summary"

Not knowing where this chart may eventually surface without its attendant narrative causes concern over the column titles as stated, the scope of the footnotes, and, the lack of attributions. We feel the following changes should be made:

- the title should read "Summary of OLSSA-Developed LSS Concept/Design Alternatives";
- if there is a column for "LSS Benefit Reduction" there should be one to reflect the attendant "Implementation RISK Increase", which been masked by considering only "Impact on the LSS Rule", (since all the alternatives present additional risk to either LSSA or DOE or NRC or the other parties);
- the column currently entitled "LSS Budget Reduction" should be changed to read "LSS Budget Not in NRC Request to OMB" or even the simpler "Reallocations";
- the column currently entitled "Recommended by Working Group" to be changed to read "Requires Further Evaluation";
- the single asterisk footnote (\*) should be extended at least through the end of FY 2001 to conform to the current schedule for application submission;
- the double asterisk footnote (\*\*) should have a fuller explanation of the assumptions involved, which parties' expectations, etc.;
- there should be an additional footnote that the cost reallocation estimates were developed by OLSSA, that they are estimates derived from yet other estimates provided by SAIC, and, that they are, at best, only "ball-park";
- that there are two elements that are actual cost reductions (10 & 11); and,
- that there are at least three elements where total cost against the Waste Fund could increment even though the reallocation shows a decrease to the NRC/OLSSA budget submittals (2, 7 & 8b).

Finally, the objections I raised about the many "NONE" items under "LSS Benefit Reduction" in my January 2, 1992 letter have not been reflected in any of the materials provided this past Wednesday. I noted in my last letter that

the benefit reduction is not NONE for alternatives #1 and #8; I noted that the reductions are not LITTLE for alternative #7, and indeed it has now become NONE (!); and, I noted that the benefit reduction for alternative #6 was not LITTLE -- that has now been changed to SMALL.

I do not concur with "LSS Benefit Reduction" as it is being presented, and am concerned by the lack of discussion in the narrative. And, I suspect that other parties, as well, will take issue with the subjectivity and presumptive slant of the characterizations. If my comments are not going to be incorporated, I ask that copies of my correspondence at least, then, be included as addenda to the report.

Comments on the Narrative Entitled "LSS Concept/Design Alternatives Summary"

In Item #1, Capture DOE LSS material using INFOSTREAMS versus LSS, add to the last sentence in the last paragraph, ". . . and less the costs necessary for OLSSA to do augmentation." This would imply that the amount (\$76.3M) requires revision. Also in Item #1, the wording in the last paragraph should be changed to reflect a "resultant reallocation" rather than a "resultant savings".

In Item #2, the group noted a change for the chart to wording such as "\$1M or less" and John Voglewede pointed out that it could be either an increment or decrement; the change should be reflected in the wording here. The wording in the last paragraph should be changed to reflect that "Although the cost reallocation is relatively small. . ."

In Item #3, the last paragraph needs a rewrite to reflect that the Working Group is recommending further consideration of the option, and, that it would result in a potential cost reallocation of \$\_\_\_\_. Also, add a paragraph to highlight the inherent difficulties of allocating a user's share of the WAN telecommunication costs.

In Item #4, the last sentence in the first paragraph reads that the "LSS participants have always expected to pay for their own LSS infrastructures, but probably not the workstations." This is ambiguous. What are their infrastructures if not, in fact, the workstations? Also, the last sentence in the last paragraph should be changed to read ". . . the Working Group anticipates that the LSS budget would reflect a \$3.1M reallocation by this alternative."

Item #5 is essentially an internal NRC issue.

Item #6 -- no comments.

For Item #7, I believe that we agreed that this should NOT be recommended for further consideration. Item #7 is, arguably, going to result in an increment to the overall costs against the Waste Fund. Where before there was one high volume printer and LSSA contractor staff to respond to high volume print commands, DOE and NRC must now each separately provide high volume printers and multiple staff, who, by nature of distributing the work, would also be

under-utilized, less-practiced, and subjected to external demands limiting their ability to meet response deadlines.

Item #8a, second paragraph, first sentence should be revised to reflect the group discussion concluding that this should NOT be recommended for further consideration. If Item #8a was going to be recommended, however, it would have to be revisited: OLSSA can not really ever get to a point where they will not require some level of intake processing capability and responsibility. LSSA will have to do record augmentation for the elements I noted in my last letter. LSSA will require capabilities for intake and broadcast of motions practice hardcopy (signed/authenticated) received for entry to the official docket after the electronic versions are submitted. LSSA will need a mechanism for intake of transcripts and setting references to exhibits for materials from the hearings (overnight). Etc., etc.

Item #8b should reflect that this is being recommended for further consideration.

The first sentence of the second paragraph for Item #9 should be revised to read ". . . and provide same to the LSS, reallocating to DOE this share of LSS cost."

Item #10a triggered the objection noted in the opening section: why not reopen the studies of including all documents in full-text versus identifying those sub-groups that would not require/benefit from full text. We agree with the objection made during the group discussion about the logic of recommending an item with MAJOR impact on the but which shows some benefit reduction and less than ½% real cost reduction.

Item #10b was noted during the discussion as requiring additional narrative, as it was not intuitively understandable how reducing 75% of the documents held in the system would result in a cost reallocation of only \$5.1 when it implies massive, redundant paper management environments in multiple locations. Again, this is arguably a cost increment to the Waste Fund.

The first sentence in Item #11a should be revised to read "The current OLSSA plan is to provide . . ." The second sentence is wrong. The option does not extend limited access, it delays it for an additional 18 months. Also in Item #11a, the first sentence in the second paragraph should read that "The Working Group recommends further consideration of this alternative . . ."

#### Concerns About Final Report

OCRWM/IMD is willing to provide consensus agreement to recommending all the items for further consideration by the Chairman, the Director, and the Administrator. As I said in the meeting, I will be in the position of having to respond to John Bartlett's request for OCRWM/IMD's analysis of the TWG findings. Even though I am in the position of affirming that they are potential elements, technically feasible, have been examined by the TWG, and should be identified to the recipients of the study, I will be responding to the OCRWM Director's request with pragmatic, DOE-interest, DOE-risk, policy and implementation-based critiques.

For example, for Item #8a, the reality is that there is such great risk to the OCRWM Program, that I could never recommend OCRWM's support. And, I suspect that other potential parties will also have severe problems accepting that DOE would be responsible for processing all of the documents they want introduced to the LSS and getting that material into the LSS prior to 12:00 midnight on the eve of the 6-month lock out prior to the date of the hearings. Will OCRWM be liable for failure to enter the truckloads that could be delivered at "the 11th hour"? How will we prioritize, who coordinate with submitters for load-leveling, would prioritizing another party's documents result in a report of non-compliance by OLSSA that we were not submitting our own materials contemporaneous with their creation? Who is going to pay for incremental resources DOE may have to add at the last minute? And how would DOE procure such last minute resources? InfoSTREAMS is not sized for it. Yet, the TWG would categorize this as having NO LSS Benefit Reduction?

Another example: if we examine Item #8a as a potential cost reallocator, why not just put the same input format and submission requirements on ALL the other parties that DOE is willing to assume for ourselves. The thinking seems to have stopped after reaching the conclusion that "it may as well be DOE's InfoSTREAMS" that shoulders the burdens and responsibilities for everyone else's conversion.

Jerry, I am confident that these concerns will be addressed and expect that this set of materials will make better sense when folded into the report. As I will be in Las Vegas all of next week, I ask that the final draft be FAXED to me in care of John Gandi's office at the Yucca Mt. Project Office. His FAX number is 544-7908 (FTS) or (702)794-7908 (commercial), and his office phone number is 544-7954 (FTS) or (702)794-7954 (commercial) should you need to leave a message for me.

Sincerely,



Daniel J. Graser  
Program Analyst  
Information Management Division  
Office of Civilian Radioactive  
Waste Management

Copies:

B. Cerny, RW-12  
J. Bartlett, RW-1