

MEMORANDUM FOR: James Taylor

FROM: Arnold E. Levin
Licensing Support System Administrator

SUBJECT: SUMMARY OF OCTOBER 5-6, 1993, LICENSING SUPPORT
SYSTEM ADVISORY REVIEW PANEL (LSSARP)

The meeting summary prepared by the LSSARP Chairman, John Hoyle, is attached (Attachment 1). At the meeting, Gerald Cranford, the Acting LSSA, presented NRC's alternative approach to the development and operation of the LSS (described in Alternative 3 of SECY 93-107). Every member of the LSSARP was opposed to this alternative. The LSSARP Chairman asked the panel members to provide him comments regarding their objections to this issue by December 17, 1993. In the meantime, we reviewed the meeting transcripts and extracted the text of all statements (Attachment 2) that appeared to be related to the issue. The transcript excerpts and letters received from the panel members are attached for your reference (Attachment 3).

From the material submitted, it appears that the panel is only concerned with two aspects of Alternative 3: a potential conflict of interest if the DOE is in control of the LSS and the ability of the DOE to set its own priorities for the loading of documents into the LSS. We are promoting Alternative 3 for sound, business reasons: it will get the job done and will cost (based on an analysis described in SECY-93-107) \$45.6 million less than Alternative 2 and \$63.4 million less than Alternative 1.

The panel is supposed to meet again during the first quarter of calendar 1994 to discuss this issue. Assuming that Alternative 3 is the only alternative acceptable to the Commission, I propose that I present the following response to those concerns:

The LSSA will develop procedures to monitor on a daily, real-time basis the loading of documents into the LSS in order to track activity against pre-established loading schedules. If the LSSA determines that the DOE has compromised the schedule in favor of loading its own materials, the LSSA will suspend certification of the loading of the DOE materials. Certification will resume when the DOE comes back into compliance with the schedule.

Within the next week, I intend to meet with the LSS Internal Steering Committee to discuss the content and exact wording of this proposal. Barring any major problems surfacing as a result of that meeting, I will ask the LSSARP to be prepared to present any variations to Alternative 3 that would be acceptable to them and still preserve the spirit of the alternative -- the effective implementation of the LSS from a cost and overall management perspective.

I think that my proposal, in conjunction with or as a part of the Compliance Assessment Program, is a reasonable solution. If the LSSARP presents viable variations to the alternative, I think they should be submitted to the Commission for their consideration. If, however, the LSSARP continues to focus on perceptions and the emotional issues related to Alternative 3, I think the only way we can implement this alternative is to proceed to make the rule change without LSSARP concurrence.

Now that I have a good understanding of current LSS activities, I would like to meet with you to discuss the future of the LSS and my role as the LSS Administrator.