

HLWYM PEmails

From: Leslie, Bret
Sent: Thursday, April 29, 2004 9:22 AM
To: Lane Howard; MASMITH@cnwra.swri.edu; Osvaldo Pensado; Oleg Povetko; Patrick Laplante; Roland Benke; Ronald Janetzke; Razvan Nes; Sitakanta Mohanty; Leslie, Bret; Grossman, Christopher; Ryder, Christopher; Danna, James; Compton, Keith; Codell, Richard; Johnson, Robert; McCartin, Timothy
Cc: Campbell, Andy
Subject: for discussing by you at this AM's TSPAI meeting
Attachments: pathforw.wpd

Folks,
this is the first agenda item. The attached is something I ginned up yesterday and I have received some preliminary comments from a few NRC pa staff. We need to discuss this and get your feedback today as I will be attempting to represent the PA perspective (along with ANDy and LAwerence) at this afternoon's brainstorming session by NRC and Center management and senior PMs on how to be prepared to conduct the licensing review. Please do not share this with others for now as I want to capture all our perspectives first.

thanks,
bret

Hearing Identifier: HLW_YM_Public_EX
Email Number: 23

Mail Envelope Properties (Bret.Leslie@nrc.gov20060208141804)

Subject: for discussing by you at this AM's TSPAI meeting
Sent Date: 4/29/2004 9:21:49 AM
Received Date: 2/8/2006 2:18:04 PM
From: Leslie, Bret

Created By: Bret.Leslie@nrc.gov

Recipients:

"Campbell, Andy" <Andy.Campbell@nrc.gov>
Tracking Status: None
"Lane Howard" <lhoward@cnwra.swri.edu>
Tracking Status: None
"MASMITH@cnwra.swri.edu" <MASMITH@cnwra.swri.edu>
Tracking Status: None
"Osvaldo Pensado" <opensado@cnwra.swri.edu>
Tracking Status: None
"Oleg Povetko" <opovetko@cnwra.swri.edu>
Tracking Status: None
"Patrick Laplante" <plaplante@cnwra.swri.edu>
Tracking Status: None
"Roland Benke" <rbenke@cnwra.swri.edu>
Tracking Status: None
"Ronald Janetzke" <rjanetzke@cnwra.swri.edu>
Tracking Status: None
"Razvan Nes" <rnes@cnwra.swri.edu>
Tracking Status: None
"Sitakanta Mohanty" <smohanty@cnwra.swri.edu>
Tracking Status: None
"Leslie, Bret" <Bret.Leslie@nrc.gov>
Tracking Status: None
"Grossman, Christopher" <Christopher.Grossman@nrc.gov>
Tracking Status: None
"Ryder, Christopher" <Christopher.Ryder@nrc.gov>
Tracking Status: None
"Danna, James" <James.Danna@nrc.gov>
Tracking Status: None
"Compton, Keith" <Keith.Compton@nrc.gov>
Tracking Status: None
"Codell, Richard" <Richard.Codell@nrc.gov>
Tracking Status: None
"Johnson, Robert" <Robert.Johnson@nrc.gov>
Tracking Status: None
"McCartin, Timothy" <Timothy.McCartin@nrc.gov>
Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	556	2/8/2006 2:18:04 PM

pathforw.wpd

16318

Options

Priority:

Standard

Return Notification:

No

Reply Requested:

No

Sensitivity:

Normal

Expiration Date:

Recipients Received:

Preparations for Conducting a Risk-Informed and Efficient License Review

Assumptions:

- 1) We need to change how we are doing business (culture change) and adopt a new approach that will prepare us to effectively and efficiently conduct a license review (to be able to meet the time constraints and assumptions, including staff responsibilities, associated with the License Review Plan).
- 2) We need to change how we are doing business and adopt a new approach that will prepare us to conduct a risk-informed review.

Overall approach:

Given these assumptions we need to change how we are dealing with the Technical Basis Documents (TBDs) and issue resolution. We should not continue the public letter writing exercise. We should use the time to: 1) develop the "Integrated Issue Resolution Status Report (IIRSR) review teams" to be ready to meet their roles and responsibilities; 2) review the TBDs in a risk-informed and total system performance perspective (integrated); 3) develop risk-informed examples Request for Additional Information(RAI); and 4) update sections of the IIRSR to reflect the new information and risk insights baseline report (*i.e.*, a risk-informed review).

Developing the Necessary Framework for Implementing a Risk-Informed Approach

Using risk information - Develop Interim Staff guidance (ISG) for how to use risk information on conducting reviews, including Safety Evaluation Report [(SER), *e.g.*, role of Risk Insights Baseline Report (RIBR) and how to apply to determine scope of review and documentation), developing RAIs, replying to contentions, and application to other portions of programs (inspection and enforcement).

Risk Insights Baseline Report - We need to have all the staff have ownership of the RIBR. The intent is to revise it (center deliverable 9/1/03) to incorporate preclosure risk insights (both calculational (primarily Center's work) and operational information (RKJ's)). Have final revised document though NRC concurrence by 12/01 date to incorporate DOE's approach. The final RIBR becomes the framework for how to focus our review, perhaps even pulling in the GoldSim "cheat sheets". Regarding owning we can provide additional examples, but unless staff and management expectations are explicitly stated, assessed, and performance assessed, we won't be any further along. We will also need to get staff comments now on how to revise as it will all the staff's document, not just the PA risk baseline.

GoldSim - logistics (computers); determine expectations for GoldSim review (minimal need to run the model). We should be able to audit the model. This means additional GoldSim training (both formal for those who haven't been exposed and informal for all post-closure groups - testing your "team's" knowledge of where things are in FEIS model). Use the "PA" technical exchanges to focus on those aspects of the PA model which will allow our LA review to be conducted effectively. Capture "cheat sheets" [which would indicate where the information (breadcrumb approach) is within the the model and identify useful outputs (tables and figures)] so that all knowledge can be shared across as we try to integrate. Use the RIBR to focus the GoldSim work to focus on those aspects that are most important to waste isolation.

TPA 5.0 - complete, run system-level sensitivity, explain major revisions to staff, layout expectations for use or non-use during the license review process (expectation is that TPA is minimally used during the review (post LA submission, to evaluate overall system performance issues), but used prior to assist in final RIBR.

Changing our Culture

Developing the framework, setting the expectations for staff and management, testing compliance with expectations, and performance-based assessment of staff and management meeting expectations are the keys to accomplishing the necessary change.

Team Approach - need to conduct exercises and training for working together as a team. Know what roles and responsibilities are for the team (lead for SER, lead for EIS, lead for testimony), commensurate with the talent in the team, make assignments, layout expectations (clearly defining the roles and responsibilities of the team and the individuals on the teams). Laying out the roles and responsibilities for teams and team members must be accomplished early so that the appropriate staff get the right training in time to fulfill their responsibilities.

Learning Organization: Staff should incorporate agency regulatory experience into the High-Level Waste Program. Specifically, preclosure staff should focus on developing lessons learned and risk information from previous licensing review activities for similar types of facilities (e.g., RAIs, SERs, EISs); rather than copying the post-closure model (e.g., independent code and calculations). Lessons learned will help the staff prepare for this review and alert staff to potential pitfalls. Developing risk information will help the staff focus the review on most important aspects of the repository system. Staff will also use this risk insights to inform the development of a the preclosure safety analysis and identify those structures, systems, and components most important to safety.

RAI - development, and incorporating risk. Practice RAI writing now using the TBD and associated information. Pull relevant examples from both SERs and EISs of related type of licensing actions. Provide an ISG on RAI, indicating how both regulatory and risk information will be used in the process. Train the staff on the RAI process (steps in development and disposition of RAI, unsatisfactory leads to open issues). Bring in staff from other licensing actions to provide us lessons learned and incorporate their lessons into our process.

SER review - first attempt is now with IIRSR (getting the risk perspective in there), but layout expectations for revising the sections, and conducting the review of the outstanding TBDs prior to LA submission.

EIS - training for the teams (IIRSR) on conducting the environmental reviews and responding to the contentions on the environmental issues. Is there a one-to-one correspondence between IIRSR and the EIS review. Additional guidance (ISG) on how to conduct the environmental review beyond the Environmental Review Guidance for Licensing Actions Associated with NMSS Programs (NUREG-1748)?

Logistics - Center OP's plan needs to reflect the mission of the agency in the next 18 months. Focus is not "professional scientific "Expertise" but doing the SER, EIS, and hearing support. The deliverables that do not directly support the review process should be eliminated as they pull NRC staff from doing the license review work. Joint product! Not Center input, NRC review (see Detail D of license review plan). Bring ENG into SPAD, integration is hard, why make it harder.

Witness Preparation - written deposition, examination on the stand, cross examination - training on all