Enclosure 2

Center for Nuclear WasteRegulatory Analyses

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U.S. NUCLEAR REGULATORY COMMISSION ATTN: Mr. Phil Altomare Division of High-Level Waste Management WF1, Mail Stop 4-H-3 Washington, D.C. 20555

Subject: Lessons Learned in the Initial Implementation of Draft
TOP-001-02, Program Architecture Relational Database Content
and Development Instructions, Revision 1

Dear Mr. Altomare:

Per your request, we are forwarding a brief summary of the lessons learned in preparing the "Baseline" analyses submitted on October 20.

The principal lesson learned can be stated very simply: Our experience has satisfied us that the PA process and the draft procedure do what they were intended to do.

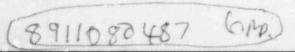
There are a few subsections of the procedure in which clarification or increased emphasis has been found to be desirable. However, the Center has not found anything to date that impacts or would require changes to either the PA process or the substance of the procedure.

A number of issues have arisen relative to the implementation of the procedure. These have been discussed and, in most cases, resolved in our twice-weekly PA Analysts meetings. Where some action outside the meeting was necessary, an action item was assigned and tracked. To date, most implementation issues have been minor. They would generally be categorized as either "Reaffirmation of the Process" or "Refinement of Analysis Techniques". The most significant examples are:

o It is most efficient for analysts to develop large segments of the so-called "Synopsis", then prepare the input forms with clerical assistance based on that material. As you may recall, the concept of the Synopsis began as the "textual hierarchy" of the Regulatory Elements of Proof. That was expanded to include the Technical Review Components and then the Compliance Determination Methods. The Synopsis has now become the primary working tool of the analyst for the process from Step 2 through part of Step 13. This approach



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has the added advantage of permitting the analyst to concentrate on the substantive content of the input rather than the form. The Synopsis also provides an excellent facsimile of one potential output of the system.

- o Analyst experience serves to emphasize the importance of the Compliance Determination Strategy. In the absence of an approved strategy, the analyst is forced to assume a strategy in order to bound the analysis. This tends to (1) produce a broad, general definition of the approach and/or (2) limit the Compliance Determination Method development to high-order, largely general methods.
- o "Combination" input forms were developed for the initial analysis of "sets" and individual Regulatory Elements of Proof, Technical Review Components, and Compliance Determination Methods. These avoid a significant amount of duplication of input form information.

Please contact me or Ted Romine if you have any questions regarding this matter.

Sincerely,

Allen R. Whiting, Director Systems Engineering and

Integration

cc: J. Funches

S. Fortuna

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Center Directors

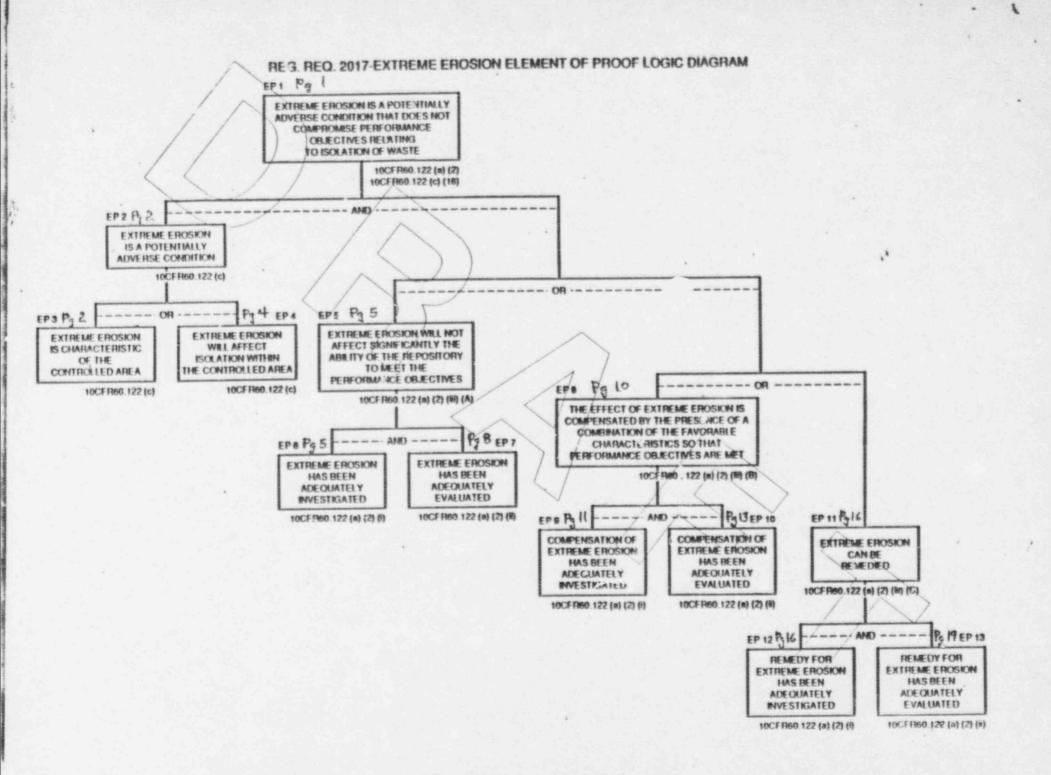
Center Element Managers

T. Romine

S. Boyanowski

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