



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

March 9, 1981

MEMORANDUM FOR: William J. Besaw, Director
Division of Technical Information
and Document Control, ADM

FROM: Myrna L. Steele, Deputy Director
Division of Technical Information
and Document Control, ADM

SUBJECT: ANALYSIS OF OMPA STUDY OF NRC'S AUTOMATED DOCUMENT
RETRIEVAL SYSTEM (ADRS) AND THE EDO MEMORANDUM OF
NOV. 18, 1980 REDIRECTING THE DOCUMENT CONTROL SYSTEM
PORTION OF ADRS

In accordance with Manual Chapter NRC-4125, "Differing Professional Opinions," I am submitting the subject report. My paper is a point-by-point analysis of the four sections of the EDO memorandum: (1) the summary EDO memorandum; (2) the mandated DCS Actions; (3) the OMPA-prepared briefing package; and (4) the so-called evidence package. Those "evidence" points that are essentially correct are, in general, not included in my analysis. Where some "evidence" points are correct in part, I have noted the agreement, delineated where the information was omitted, and corrected information that is erroneous.

There are three things about the report that I find particularly interesting:

1. The number of omissions of fact and omissions of substance are staggering. These omissions are particularly important when one considers that the redirection of the project was based on this study alone, ignoring 10 years of studies and collections of information needs and requirements for technical information support.

The omissions are specifically noted and discussed in my Response columns in the attached text. As an example, "Finding A" of the OMPA report purports to address the requirements and user needs. However, all of the information we gave the seven different OMPA study group members over the five months of the study is not included; nor is it even referenced. In fact in the "evidence" package for "Finding A," alone, there are six major omissions.

In the whole report there are at least 17 major omissions.

2. The lack of logical progression from the EDO/DEDO memo to the DCS Actions mandated by the EDO/DEDO, then to the briefing package, and finally to the so-called evidence package have made it extremely difficult to organize a logical presentation of omissions and of errors of fact and of judgment.

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2.

In fact, in attempting to deduce the mandated actions based on the "evidence" package, I was convinced that a logical connection does not exist.

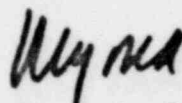
3. Finally, the EDO/DEDO mandated "DCS Actions" seem to have been the answer from which all else was constructed.

The reason for this statement is that only in the briefing package ("Finding E") do the actions mandated by EDO/DEDO memo occur. The so-called evidence package never even addresses the mandated actions.

Obviously, I differ greatly with the EDO/DEDO memorandum of November 18, 1980. I can only question its bases, logic, and the ultimate "Actions" because they do not make sense.

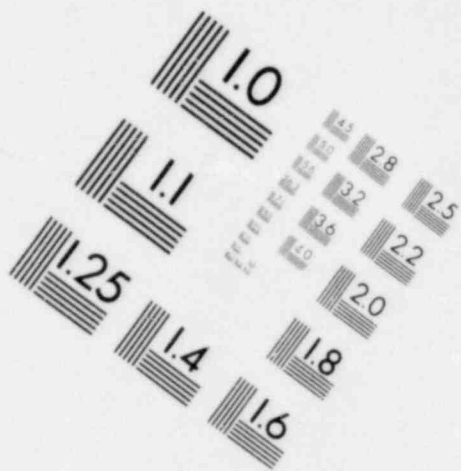
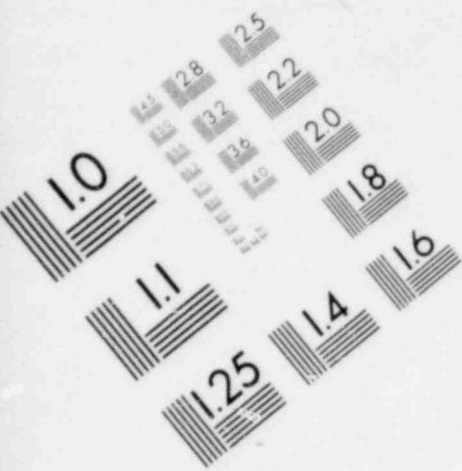
Since OMPA gave us only 1 1/2 hours to "look over" the briefing package, and Dr. Cornell chose to meet with us only once for an hour or two shortly after the OMPA gave him the final report, it appeared to me that his audience was pro forma and not intended to hear either our objections or problems with the report. As a matter of fact, we had no opportunity to comment substantively on it.

As you know, this System (ADRS) was planned, until the November 18, 1980 Actions, to provide the basic technical information tool to support the licensing and enforcement activities by assisting, first, with the retrieval of safety-related and licensing information and, later, with the actual analyses of safety and licensing aspects of the plants. The value of the System for this has been recorded already by the Systematic Evaluation Program staff in NRR and by the IE staff. In fact, the applicability of the System was ensured in our tailoring applications prior to EDO's actions. For these reasons, I consider the EDO/DEDO mandated actions to be a direct incursion into the NRC's activities to assure public health and safety, and am, therefore requesting that serious consideration be given to the attached report. Further, I am requesting that actions mandated by the EDO be stayed until such time that a proper and fair consideration be given at the Commission level, and that this document be forwarded to the Commission so that I have a chance to present the Staff's side of the picture as well as the EDO/DEDO/OMPA position.

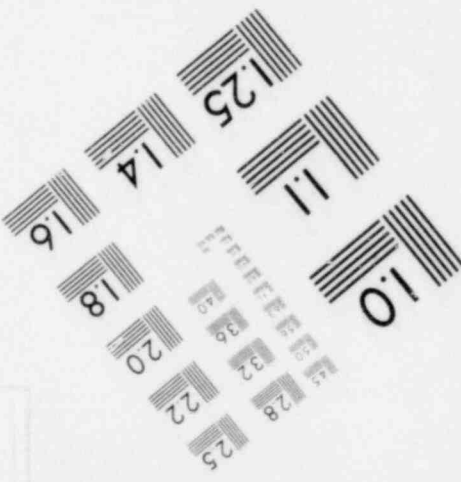
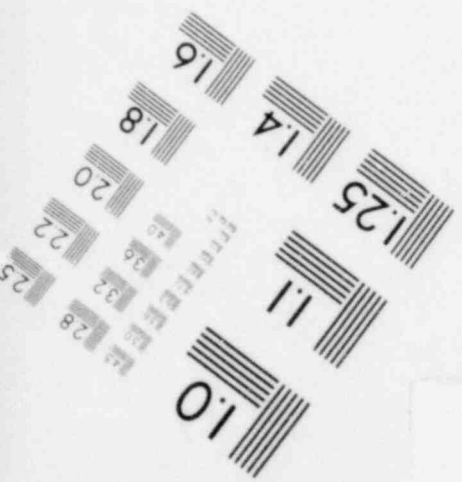
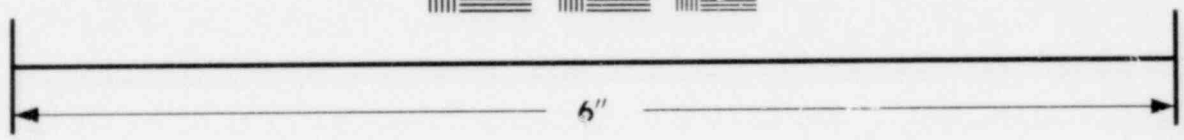
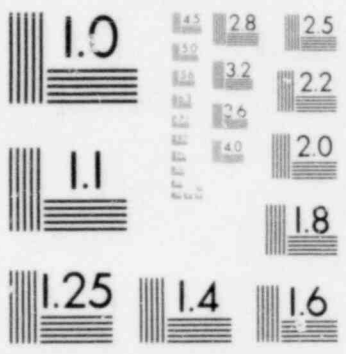


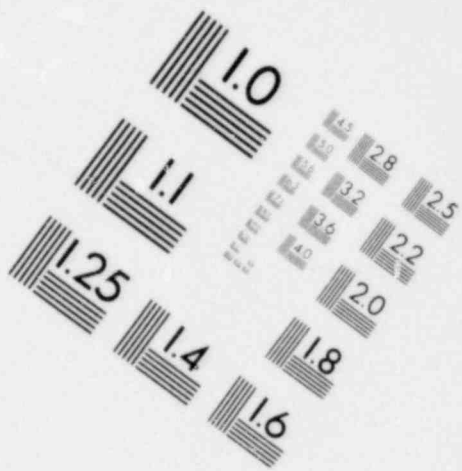
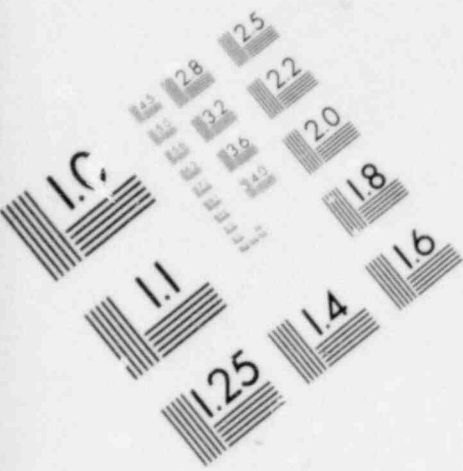
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Enclosure:
Analysis of OMPA Study



**IMAGE EVALUATION
TEST TARGET (MT-3)**





**IMAGE EVALUATION
TEST TARGET (MT-3)**

