

ACNW SUMMARY MATRIX OF 1999 LETTERS AND OUTCOMES

ACNW Letter	Main Message	EDO/Commission Response	Timeliness	Effectiveness/ Outcome	Recommended Follow-up
Development of a Standard Review Plan (SRP) for Decommissioning, January 11, 1999.	The ACNW (1) supports staff's plans and activities to develop the SRP; (2) applauds increased staff interactions and stakeholder involvement; (3) endorses use of D&D Management Board; (4) supports plans to test D&D and site-specific codes and to develop guidance on code selection; and (5) supports making clearance criteria for D&D sites a priority.	The staff finds ACNW comments useful and constructive and will continue with plan to develop the SRP including stakeholder involvement. The staff has initiated development of clearance criteria and is working with ACNW staff on SRP issues.	Timely. The ACNW review and product were coordinated to accommodate staff's schedule.	The staff concurs with ACNW recommendations. A final evaluation will be performed when the multi-year effort is completed.	Continue to follow effort. The ACNW intends to conduct more in-depth reviews of D&D issues and devoting more time and resources into D&D in CY2000.

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<p>Comments on the Regulatory Uses of Importance Measures (IMs) for Waste Management and Possible Application to the Proposed High-Level Radioactive Waste Repository at Yucca Mountain, NV, January 12, 1999.</p>	<p>The ACNW is encouraged by the staff's work. The Staff should (1) develop IMs for waste management as part of an assortment of tools for evaluating risk significance and establishing priorities; and (2) develop post-processor to rank-order contributors; review application of IMs to reactors; and (3) apply methodology at scenario level.</p>	<p>The staff agrees that IMs should be developed for waste management and plans to pursue ACNW recommendations in addition to other tools to display system output; The staff is not convinced it can display results in same way as reactors. The staff requests ACNW to provide any additional examples of application of IMs.</p>	<p>Timely. Advice provided in time to potentially influence NMSS HLW rule and guidance development.</p>	<p>Staff indicates it will pursue ACNW advice. Final outcome is to be determined.</p>	<p>Continue to evaluate staff's development of IMs and their incorporation into YMRP; request briefing on status of IMs. Determine whether ACNW finds the staff's proposed approach to DID using degraded barriers acceptable.</p>

The information provided in the "main message" and "EDO/Commission Response" columns is intended to summarize the content of the associated documents. The reader should refer to the documents for more detail.

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<p>Advisory Committee on Nuclear Waste 1999 Action Plan and Priority Issues, January 22, 1999.</p>	<p>A top-down framework was developed to guide ACNW in setting its priorities and focus; updates CY1998 near- and far-term priorities and process improvements.</p>	<p>The Commission encouraged ACNW to continue dialogue with NMSS and stated that ACNW priorities are generally consistent with staff's. The Commission stated that the ACNW should avoid spending time on risk communication at the expense of other key technical issues in HLW and D&D and encouraged continued use of informal meetings with staff.</p>	<p>Timely. Advice was proactive, and was coordinated with NMSS priority planning.</p>	<p>Favorable Commission response; provided clear direction for ACNW in carrying out its CY1999 activities; enabled ACNW to carry out all of its first-tier and some second-tier topics; helped bring risk communication topic to forefront of ACNW and DWM activities.</p>	<p>Conduct top-down planning session 2/23/00-2/25/00. Respond to new Commission requests during planning. Request briefing on NMSS Arthur Andersen strategic planning and priority activities and schedules for CY2000.</p>

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<p>Comments on the Department of Energy's Viability Assessment for the Proposed High-Level Radioactive Waste Repository at Yucca Mountain, NV, April 8, 1999.</p>	<p>The ACNW recommended that (1) as part of 10CFR Part 63 rulemaking and guidance development, require DOE to provide transparent TSPA model and supporting evidence in LA; (2) provide guidance on acceptable data and assumptions; (3) be prepared to evaluate engineering designs; and (4) outline steps in the licensing process; and (5) define DID for waste repositories.</p>	<p>The EDO stated that the staff will work with DOE to ensure clarity of PA and will outline in YMRP what will be acceptable in PA. The EDO agreed that the LA should clearly reference supporting data and have augmented engineering design review capability. 10 CFR Part 63 does outline the steps in licensing process. The staff is developing a strategy for DID.</p>	<p>Timely. Advice was developed on a schedule which allowed an opportunity for ACNW to brief the Commission in a public meeting. Resources were used to preform a detailed review of the VA prior to ACNW's discussions with the staff Advice was provided prior to Commission review of staff's VA comments.</p>	<p>At Commission's request, advice was transmitted to DOE along with NRC staff's VA comments.</p>	<p>Ensure that past advice and advice in the VA letter regarding 10 CFR Part 63 rulemaking have been considered. Review latest rev. of TSPA IRSR and other IRSRs to ensure these documents require DOE to provide adequate quantification of the contribution of individual barriers.</p>

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<p>Review and Evaluation of the Nuclear Regulatory Commission Safety Research Program, NUREG-1635, Vol. 2, provided to ACRS in April, 1999, Final Joint NUREG report issued June 1999 .</p>	<p>ACNW was impressed with specific projects but questioned whether NMSS is using PA to prioritize work as recommended previously. The ACNW stated that NMSS should adopt a procedure to prioritize on basis of TPA results, phase out work on igneous activity (IA), and make greater use of external experts.</p>	<p>The EDO provided detailed response to the recommendations in the report. The ACNW and the staff have discussed (June 1999 ACNW visit to CNWRA) (1) how its four step process is used to establish priorities; (2) that it must maintain minimum level of effort in igneous activity (IA) due to IA's contribution to total risk and (3) that it has expanded its use of external experts.</p>	<p>Timely. The report was provided in accordance with the Commission schedule. Additional resources were allocated to the work on the CY1999 research report to provide earlier and more effective input into the budget process.</p>	<p>The ACNW provided valuable input into the research planning process. Subsequent discussions with the staff indicate several of the recommendations have been or are in process of being adopted.</p>	<p>Committee must decide if EDO's reply is responsive and will discuss this matter during the November 2000 visit to the CNWRA. A response to EDO letter will be included as part of next letter report to Commission.</p>

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<p>Advisory Committee on Nuclear Waste Metrics and Self-Assessment Evaluation for Fiscal Year 1998, April 29, 1999.</p>	<p>The ACNW developed a three-tiered system to measure performance against desired outcomes and goals described in 1998 strategic plan. Committee concludes significant progress has been made in achieving desired effectiveness and timeliness.</p>	<p>The Commission stated that it supports the effort and acknowledges significant progress. Future assessments should (1) acknowledge that adopting some advice may be limited by budget,(2) consider whether advice resulted in changes to or supported staff plans or positions, (3) continue to address recommendations resulting in no staff action with the staff.</p>	<p>Advice provided within four months after evaluation period and was sufficiently timely to help focus ACNW efforts in CY1999.</p>	<p>Letter helped focus Committee efforts and received Commission acknowledgment and request for follow-up action; drew staff attention to and stimulated CNWRA to address those areas highlighted as having resulted in no staff action.</p>	<p>Conduct self assessment for CY1999. This matrix in part comprises the self assessment.</p>

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<p>Linear No Threshold Hypothesis, June 4, 1999.</p>	<p>The ACNW believes that 100 mrem provides sufficient protection and the collective doses should not be used in setting radiation standards. The ACNW stated NRC should monitor DOE research program on biological effects of low-dose radiation; and the NRC should support needed research on effects of long-term exposure.</p>	<p>The Commission stated that it must use collective dose for analyzing cost benefit for now and will follow ICRP deliberations on appropriateness of using collective dose. RES will monitor DOE research activities and evaluate the feasibility of conducting additional research.</p>	<p>Letter was proactive. The ACNW continues to have a significant impact on the efforts to resolve this issue.</p>	<p>Letter resulted in direct response from Chairman of NRC stating that agency will continue to follow developments related to this issue.</p>	<p>Monitor staff and DOE activities. Schedule ACNW discussions on the status of issue in 2001 unless developments warrant earlier reconsideration. Monitor BEIR VII NCRP/ICRP activities.</p>

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<p>Comments on DOE's License Application Design Selection Process (LADS) and Recommended Repository Design, August 9, 1999.</p>	<p>Innovative ways to engineer natural setting to improve overall performance were described. The ACNW stated that the staff should conduct independent evaluations of alternative designs and remain flexible to implement design changes that improve performance and may enhance cost-effectiveness. The ACNW stated that it was too early to reject the hot repository concept.</p>	<p>NRC staff reviews DOE proposals and does not undertake development or evaluation of innovative alternative designs. The YMRP will provide guidance for the review of alternate designs. The EDO agrees that the NRC should allow DOE flexibility to propose design revisions. [One Commissioner stated that the ACNW recommendations go beyond NRC mandate (from 12/15/99 Commission meeting)].</p>	<p>Message to remain flexible and consider cost-effective approaches is timely as staff approaches the licensing phase of Yucca Mountain and begins considering performance confirmation needs.</p>	<p>Work on 10 CFR Part 63 and YMRP is still in progress. Staff agrees that it is important to retain the flexibility to implement design changes that improve performance and enhance cost-effectiveness. The NRC staff response to public comments on 10 CFR Part 63 may indicate that additional attention is required on design alternatives.</p>	<p>Review details of staff's performance confirmation plans in 10 CFR Part 63 and YMRP. Focus on repository design as part of Committee's effort under site recommendation priority.</p>

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<p>Implementing a Framework for Risk-Informed Regulation in the Office of Nuclear Material Safety and Safeguards (NMSS) 11/17/99 (Joint ACRS/ACNW letter).</p>	<p>The ACRS and ACNW recommended that NMSS develop a set of principles and a safety goal approach for each of its regulated activities to guide in implementation of risk-informed and performance-based regulation. The ACRS and the ACNW also recommended that NMSS should identify analytical methods to be applied in risk-informed and performance-based regulation on an application-specific basis.</p>	<p>The EDO addressed and, in general, agreed with the ACRS/ACNW recommendations. The staff is examining a new approach for screening/qualifying potential risk-informed elements for each NMSS regulatory activity and has begun to examine risk methods applied to NMSS activities.</p>	<p>Report was issued on a schedule that provided timely input into the staff's work. The report was issued after the Commission had issued a SRM on this matter.</p>	<p>Effective interaction has been established between the ACRS/ACNW and the staff.</p>	<p>The Joint ACRS/ACNW Subcommittee plans to continue its review of staff activities in this area during future meetings. The ACRS and the ACNW are working to improve the process used to issue joint Committee work products.</p>

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<p>ACNW Round-Table Discussion with Yucca Mountain Stakeholders on the Role of Safety Assessment in Regulatory Decision-Making-Observations and Recommendations, December 23, 1999.</p>	<p>The ACNW noted that risk communication involves listening and involving stakeholders, rather than simply soliciting public comments. The ACNW stated that NRC should (1) evaluate feasibility of involving public in its performance assessment; (2) achieve greater consistency and clarity in its risk assessments; and (3) take lead on clarifying roles in HLW transportation.</p>	<p>The EDO (1) agreed that stakeholders should be involved in the decision-making process and is doing this with 10CFR Part 63 rulemaking; (2) agreed that stakeholders should be involved in performance assessment and is doing this by holding public DOE/NRC interactions on TSPA and YMRP; (3) agreed with need for consistency, clarity, and transparency in NRC's risk assessments, and stated that a framework for risk assessment (SECY-99-100) was developed for this purpose; (4) agreed that transportation is important but stated that</p>	<p>The ACNW recognized the importance of risk communication early and helped focus the NRCs attention on this issue.</p>	<p>ACNW focus and emphasis on topic appears to have stimulated greater activity and awareness within the NRC on the importance of public involvement. Staff may have not understood ACNW's recommendation to consider directly involving public in PA process.</p>	<p>Follow-up as per Commission request at December 1999 public meeting to hold additional meetings with stakeholders in Nevada. Continue to serve as an agent for improving public and stakeholder involvement. Meet with staff to discuss ACNW recommendation to evaluate feasibility of involving public in PA</p>

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<p>Update on the ACNW Review of the NRC Safety Research Program Concerning Work Related to Waste Management, NUREG 1635-Vol 3 (ACNW section transmitted to ACRS 12/99).</p>	<p>NRC's efforts in research concerning waste management are fundamentally sound. ACNW remains concerned about whether resources available for RES and NMSS are adequate. The ACNW is encouraged by RES use of a formal process to establish priorities.</p>	<p>Response not issued yet.</p>	<p>Letter provided early input into FY2001 budget decisions.</p>	<p>To be determined</p>	<p>Continue to follow research activities related to waste management and evaluate RES use of a formal process. Determine what approach to use in the review research program in 2001.</p>

ACNW Definition of Acronyms

ACNW	Advisory Committee Nuclear Waste
AHP	Analytical Hierarch Process
CNWRA	Center for Nuclear Waste Regulatory Analyses
D&D	Decontamination and Decommissioning
DID	Defense In Depth
DOE	Department of Energy
DWM	Division of Waste Management
EBS	Engineered Barrier System
EIS	Environmental Impact Statement
HLW	High Level Waste
IA	Igneous Activity
ICRP	International Commission on Radiological Protection
IM	Importance Measure
IRSR	Issue Resolution Summary Report
KTI	Key Technical Issue
LA	License Application
LADS	License Applications Design Selection
NCRP	National Council on Radiation Protection
NMSS	Nuclear Material Safety and Safeguards
PA	Performance Assessment
PRA	Probabilistic Performance Assessment
RI	Risk-Informed
RIPB	Risk-Informed, Performance Based
RIPBR	Risk-Informed, Performance-Based Regulation
SRM	Staff Requirements Memorandum
SRP	Standard Review Plan
TPA	Total Performance Assessment
TSPA	Total System Performance Assistant
VA	Viability Assessment
YM	Yucca Mountain
YMRP	Yucca Mountain Review Plan