

POLICY ISSUE INFORMATION

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FOR: The Commissioners

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SUBJECT: SEMIANNUAL REPORT ON STATUS OF STAFF INFORMATION
TECHNOLOGY/INFORMATION MANAGEMENT AND
BUSINESS PROCESS ACTIVITIES IN PREPARATION FOR THE
HIGH-LEVEL WASTE REPOSITORY PROCEEDINGS

PURPOSE:

To inform the Commission about the status of Information Technology/Information Management (IT/IM) and business process activities related to preparation for the conduct of the proceeding on a license application for the construction of a high-level waste (HLW) repository in an electronic environment.

SUMMARY:

In March 2003, a HLW Business and Program Integration (HBPI) function was established to integrate all Agency activities, to ensure the completeness of HLW business needs of the Agency and to ensure that systems exist, or will exist, to meet the needs of processing a license application for an HLW repository and supporting the HLW adjudicatory process.

Previously, the Commission received semiannual reports from the Licensing Support Network Administrator (LSNA), that covered the areas discussed in this report. Future semiannual

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reports of the LSNA will be limited to activities related to Atomic Safety and Licensing Board Panel (ASLBP) responsibilities. This report, which will also be issued semiannually, covers all other HLW IT/IM and business process activities. The scope of this information paper includes activities from July 1, 2003, through December 31, 2003.

DISCUSSION:

A. Project Plan

Compliance with 10 CFR Part 2, Subpart J, which contains the requirements for the HLW proceeding, requires close communication, coordination, and integration of activities and functions across several U.S. Nuclear Regulatory Commission (NRC) organizations responsible for IT/IM, adjudication, technical support, and associated business processes and procedures. Collectively, these activities are called the HLW Licensing Support Program (HLW-LSP). The following initiatives, which are the responsibility of several NRC organizations, make up the HLW-LSP: Licensing Support Network (LSN); Digital Data Management System (DDMS); HLW Electronic Hearing Docket (HLW-EHD); Electronic Information Exchange (EIE) forms and process for HLW licensing activities; identification and electronic processing of NRC documentary material that must be made available via the LSN; and upgrades to the Agency's IT infrastructure and IM processes.

These are complex multi-year programs, most of which will extend until the end of the HLW repository proceedings, with multiple components requiring significant advanced project planning. Some of the systems have existing project plans. However, there was no integrated plan that identified all key activities and all interfaces and dependencies of various systems and activities. The HBPI is overseeing the development of an HLW-LSP Project Plan guiding the execution of these activities. The Project Plan will develop and implement an appropriately rigorous and disciplined project management approach to assist NRC in meeting the technical, adjudicatory, and programmatic requirements of the HLW-LSP. The HLW-LSP Project Plan is being developed with the support of Project Performance Corporation (PPC), using an interactive process and ongoing communication with staff and management from all organizations supporting the HLW-LSP.

The first draft of the HLW-LSP Project Plan was completed on December 1, 2003. The draft focused on priority areas, including the work breakdown structure, integrated schedules, and Risk Management Plan. Also under development for inclusion in the Project Plan are the Communications Plan, Records Management Plan, and a Change Control Plan. The draft final Project Plan was recently provided to the Commission.

B. HLW Meta-System Status

The HLW Meta-System is that collection of systems and processes that enables the processing of HLW documents in support of the HLW proceedings and in support of the establishment of an HLW adjudicatory docket, as required by the regulations (Part 2, Subpart J). Significant components of the Meta-System include EIE; Document Processing Center processing; Agencywide Documents Access and Management Systems (ADAMS); Office of the Secretary (SECY) processing; EHD; and DDMS. In addition, the HLW Collection (HLWC) Server, and the

LSN system support the “discovery” phase of the proceedings by enabling NRC to share its HLW documents with the participants. The status of the LSN, other than the staff’s certification efforts, is covered under reporting by the LSNA, and will not be further discussed here.

Although Meta-System components and processes are in place to process a low volume of HLW documents, additional significant, unbudgeted work is required to fully develop some of the components of the Meta-System and associated processes and procedures in fiscal years 2004 and 2005. System enhancements are needed to increase capacity, reliability, and availability, and significant testing will be required to verify and validate system performance.

HBPI and Office of the Chief Information Officer (OCIO) staffs along with ASLBP; Office of the General Counsel (OGC); Office of Commission Appellate Adjudication; and SECY, held a significant number of meetings to further define and initiate development of the Meta-System. This effort, which included developing a high-level concept of operations, identifying the business need requirements of ASLBP, SECY, OGC, and Office of Nuclear Material Safety and Safeguards (NMSS), and identifying gaps and actions needed to fully develop the Meta-System, culminated in the issuance of an HLW Gap Analysis Phases and Action Plan Report in late December.

The individual systems and processes, as well as the entire Meta-System, must function to support the expectations (business processes) of the involved organizations. To this end, it is important that there be an in-depth understanding of the Service-Level Requirements (SLRs) imposed by the business requirements of the involved organizations and the requirements of 10 CFR Part 2, Subpart J. SLRs describe the product characteristics and/or services the customer receives from the service provider. A separate Commission paper is being developed to provide the Commission with concept of operations options available and their costs.

HBPI and OCIO personnel facilitated a series of in-depth SLR meetings, starting in December 2003, to determine what service levels would be required by different organizations. The specific requirements discussed included availability (planned downtime of systems and processes); reliability (unplanned outage time of system and processes); capacity; and continuity of operations. These SLRs become a very significant challenge that will place significant demand not only on the Meta-System, but also on the Agency’s IT infrastructure.

During the fall of 2003, Meta-System testing was conducted in NRC’s Consolidated Test Facility. Five “end-to-end” test scenarios were chosen to fully exercise the existing portions of the Meta-System. The results of this testing will be used as a guide to further develop the Meta-System. The testing verified the capability of the systems and processes to process a wide variety of documents. Timing studies provided insights into potential weaknesses of the Meta-System that will be addressed via future system enhancements. As discussed above, all activities needed to fully develop the Meta-System are being incorporated into the Project Plan.

C. Regulatory Guidance - Regulatory Guide 3.69

Regulatory Guide (RG) 3.69, “Topical Guidelines for the Licensing Support System,” dated September 1996, is being revised, consistent with 10 CFR Part 63, and the “Yucca Mountain Review Plan” (NUREG-1804), dated July 2003. The RG defines the scope of documentary

material that should be included in the LSN. Proposed Revision 1 to the RG was issued as Draft Regulatory Guide 3022 for public comment. Nine comment letters were received. While there may be changes to the RG based on these comments, issuance of the final RG is on hold until staff completes the response to public comments on the recent proposed amendments to 10 CFR Part 2, Subpart J. Amendments to Subpart J may require additional edits to the final RG. Staff is working to expeditiously issue the final Subpart J rule and the final version of the RG. At the last LSN Advisory Review Panel (LSNARP) meeting in December 2003, the staff noted that the proposed Revision 1 to the RG is adequate for determining what documents should be made available to the LSN.

D. Sensitive Homeland Security Screening

All NRC documents that are being made available to LSN are being screened for sensitive homeland security information. The criteria currently being used are consistent with the criteria being developed by a joint U.S. Department of Energy (DOE)/NRC working group. The joint working group has prepared CG-OCRWM-1, "Joint DOE and NRC Sensitive Unclassified Information and Classification Guide for the Office of Civilian Radioactive Waste Management Program." The working group was chaired by DOE Information Classification and Control Policy with participation from the DOE Office of Civilian Radioactive Waste Management (OCRWM), the DOE OGC, the DOE Nevada Operations Office, and the NRC. The guide provides guidance on what is sensitive unclassified information and classified information associated with the DOE OCRWM's program for constructing and operating a geologic repository for the disposal of spent nuclear fuel and HLW at Yucca Mountain, Nye County, Nevada. The guide has been approved by the Director, DOE Information Classification and Control Policy, and is being reviewed for approval by NRC's Office of Nuclear Security and Incident Response.

E. NRC Certification Activities

According to 10 CFR Part 2, Subpart J, NRC must certify it has identified and made electronically available its documentary material to the LSN, no later than 30 days after the DOE certification of compliance. DOE plans to certify LSN compliance in June 2004, and NRC expects to certify compliance in July 2004. The NMSS Office Director is being designated as the responsible official to certify to the Pre-License Application Presiding Officer that NRC documentary material has been identified and made electronically available.

The staff, with significant coordination and input from the LSNA and his staff, has established a Certification Program to manage the numerous activities necessary to certify its documentary material collection. The certification program consists of activities and processes that:

(1) identify documentary material; (2) make documentary material electronically available; and (3) establish procedures. The activities to identify documentary material include scanning legacy documents from the Legacy Library (pre-ADAMS); Center for Nuclear Waste Regulatory

Analyses; NRC staff offices (both organizational and individual); and former HLW files. After these files are scanned, they are converted to Portable Document Format and added to ADAMS. Additionally, bibliographic headers only will be added to those documents that are not

suitable for image or searchable full text, or the documents subject to claims of privilege or other bases for non-disclosure. Before the documents are made publicly available in ADAMS, they

are screened for sensitive homeland security information. After the screening is complete, the documents are published from ADAMS to the LSN. At the end of calendar year 2003, over 15,000 out of approximately 35,000 documents from NRC's collection have been published on the LSN. The staff is on schedule to certify, in July 2004, that it has identified its documentary material and made it electronically available via the LSN.

F. Interactions with DOE and Other Potential Parties

The staff has actively participated in the two LSN Advisory Review Panel meetings with DOE, discussed in the LSNA's semiannual report. There has been no identified need for further technical exchanges with DOE during this period.

G. Efforts to Identify Adjudicatory Employees for Commissioners

The staff developed a special Yucca Mountain module for the Strategic Work Place Skills and Knowledge Survey, to better determine existing skills available for the Yucca Mountain review and adjudicatory employee (AE) support to the Commission. The survey was announced on October 31, 2003, and results were available in late December 2003. The results will be used to identify staff to support the AE function and the NRC staff review of the DOE license application.

COORDINATION:

The OGC has no legal objection. This paper has also been coordinated with SECY and the LSNA.

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