

# POLICY ISSUE (Information)

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SECY-04-0148

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 in an electronic environment for the construction of a high-level waste (HLW) repository.

## BACKGROUND:

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 both of processing a license application for an HLW repository and of supporting the HLW adjudicatory process.

This report is issued semiannually and covers HLW IT/IM and business process activities. The first information paper, SECY-04-0056, covered July 1, 2003 through December 31, 2003. The scope of the information paper includes activities from January 1, 2004, through June 30, 2004.

## DISCUSSION:

### A. Project Plan

Compliance with 10 CFR Part 2, Subpart J, 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

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business processes and procedures. Collectively, these activities are called the HLW Licensing Support Program (HLW-LSP). The HBPI has overseen the development of an HLW-LSP Project Plan to guide the execution of these activities.

The HLW-LSP Project Plan is being maintained with the support of Project Performance Corporation, using an interactive process and ongoing communication with staff and management from all organizations supporting the HLW-LSP. The latest version of the HLW-LSP Project Plan was distributed on June 28, 2004. The Project Plan contains the work breakdown structure, integrated schedules, Risk Management Plan, Communications Plan, Records Management Plan, and a Change Control Plan.

Although the framework provided by the Project Plan is relatively static, some components are updated on a weekly basis. This includes the integrated schedule, management summary, and schedule observations. Other components, such as the Risk Management database, are updated on a monthly basis to reflect progress in risk mitigation and risk disposition. Newly identified risks, however, may be added to the database and tracked at any time. Lastly, some components, such as the Change Control Plan, trigger updates or meetings only when criteria in the Project Plan are satisfied.

Recently a major refinement of the project schedule was completed, which emphasized collaborative and interdependent activities among the participating NRC organizations. During this overhaul, a "template" approach was used in which common activities and tasks involving NRC IT infrastructure and IT security were uniformly applied to each of the IT systems. Progress was made in use of "plain language" throughout the schedule. The advantage of the refined schedule is that agency management may now schedule their resources more efficiently and effectively. Furthermore, the resource impact of delays or accelerations in the schedule may be accurately forecast.

Work is continuing on the generation of reports, for management, that more efficiently and better communicate project data needed to manage, at all levels of the organization. A new critical activities report is under development. On a weekly basis, reports are generated that show the critical path, completed tasks, tasks that are overdue to start, and tasks that are upcoming during the next 30 days, and next 31-90 days. Managers review and act on the data to address risks and the impact of scheduling changes, taking appropriate actions to keep the project on track.

#### B. HLW Meta-System Status

The HLW Meta-System is that collection of software applications, technology, and data flows 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 (10 CFR Part 2, Subpart J).

Although Meta-System components and processes are in place to process a low volume of HLW documents, there still remains additional significant, unbudgeted work that will be required to fully develop 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 the Atomic Safety and Licensing Board Panel (ASLBP); Office of the General Counsel (OGC); the Office of Nuclear Material Safety and Safeguards (NMSS) and Office of the Secretary (SECY), hold weekly senior management meetings to monitor progress and discuss issues related to the HLW-LSP and Meta-System. During this reporting period significant progress has been made in developing a high-level concept of operations, identifying the business-need requirements of ASLBP, SECY, OGC, and NMSS, and scheduling, in the Project Plan, the tasks and actions needed to fully develop the Meta-System. We remain on track to have a fully functional and tested Meta-System by April 2005, although there is virtually no slack in the project schedule. The greatest risk to the project is funding uncertainty.

Service-Level Requirements (SLRs) imposed by the business requirements of the involved organizations and the requirements of 10 CFR Part 2, Subpart J describe the product characteristics and/or services the customer receives from the service provider. A separate Commission paper, SECY-04-0108, was provided to the Commission with options for SLRs and their associated costs.

During June 2004, a second round of Meta-System end-to-end testing was conducted in NRC's Consolidated Test Facility (the first round was completed during the Fall of 2003). An interactive test scenario representing a postulated challenge to the U.S. Department of Energy's (DOE) certification was chosen to fully exercise the existing portions of the Meta-System. NRC participants from NMSS, SECY, OGC, and OCIO were able to participate from their desks, or at a nearby location of their choice, in a test script that was tailored to exercise each organization's role. Two NRC staff members also simulated the roles of external parties. The testing verified the capability of the systems and processes to process a wide variety of documents. Testing results provided insights into potential weaknesses of the Meta-System that will be addressed via future system enhancements. Two additional rounds of testing are scheduled for Fall 2004 and early Spring 2005.

#### C. Regulatory Guidance - Regulatory Guide 3.69

Revision 1 to Regulatory Guide (RG) 3.69, "Topical Guidelines for the Licensing Support System," was made publicly available on June 25, 2004, on NRC's website. The RG provides guidance regarding the scope of documentary material that should be identified in, or made available electronically. There are no substantial changes between the draft RG, which parties have been using to prepare documentary material for LSN certification, and the final RG. Revision 1 modifies the topical guidelines to be consistent with the license application content specified in 10 CFR Part 63; the structure of Revision 2 of the "Yucca Mountain Review Plan," NUREG-1804; environmental topics in DOE's Environmental Impact Statement (EIS) and NRC's NUREG-1748, "Environmental Review Guidance for Licensing Actions Associated with

NMSS Programs"; and the final 10 CFR Part 2, Subpart J, revision issued June 14, 2004, which excludes correspondence between a party and Congress from the LSN. A Federal Register notice was published on July 6, 2004, with a detailed response to public comments.

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 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 a DOE Information Classification and Control Policy representative with participation from the DOE Office of Civilian Radioactive Waste Management (OCRWM), the DOE OGC, the DOE Nevada Operations Office, and NRC. The guide provides guidance on the definition and handling of sensitive unclassified information and classified information associated with the DOE OCRWM 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 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 made its certification on June 30, 2004, and NRC certified on July 30, 2004. The NMSS Office Director was designated as the responsible official to certify, to the Pre-License Application Presiding Officer, that NRC documentary material was identified and made electronically available.

The staff 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. All certification activities have been completed. Certain activities will continue on a periodic basis throughout the proceeding (i.e., after certification), as required by the regulations, including: (1) identifying newly generated documentary material; (2) identifying newly generated documentary material, if any, that is privileged, requiring a bibliographic header; (3) conducting Homeland Security Screening of documents; and (4) publishing documents to the LSN (over 24,500, to date). NRC staff not involved in certification activities conducted a review of the staff's readiness to certify and found that the staff developed and followed procedures for identifying and making available documents to the LSN that are consistent with Part 2 requirements.

F. Electronic Hearing Docket

In an effort to assist the Atomic Safety and Licensing Board with current adjudicatory proceedings and to flesh out implementation issues before an anticipated HLW proceeding, the Electronic Hearing Docket was activated to display hearing files for existing proceedings. Issues that arose were addressed, and users have provided favorable feedback. Enhancements are being implemented before the anticipated HLW proceeding.

COORDINATION:

The OGC has no legal objection. This paper has also been coordinated with SECY and the Licensing Support Network Administrator.

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