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MRB-0396

Mr. Joel C. Haugen, Manager
Materials Integration Office
U.S. Department of Energy
Chicago Operations, Bldg. 201
9800 S. Cass Ave.
Argonne, IL 60439

WM Record File

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WM Project 1

Docket No. _____

PDR ☒

LPDR _____

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Dear Joel:

From time to time we hear that the MCC/MRB process is slow, needlessly fussy about what appear to be trivial matters, and generally intractable and unaccommodating. Most recently, the issue that has been raised concerns the allegation that the many test methods that are to be submitted by ONWI simply will not be processed fast enough to make the effort of submission worthwhile.

We respond that some of these "accusations" addressed to the MRB may well have some substance. We contend that many of the submissions we have reviewed at the OTC level have been unsatisfactory by being incomplete, incorrect, poorly prepared and assembled, or in other ways are not fit submissions that have a reasonable chance of withstanding the criticism of responsible scientists. In short, submissions have been so flawed that neither we, nor, we suspect, the MCC can tolerate their inclusion in the Handbook. We are convinced that a part (but only a part) of the reason for the submissions in this sorry state is the press of unrealistically devised milestones. Under these conditions the processing cannot be anything but slow. The need to correct errors is compelling and the only solution is to correct deficiencies.

The MRB, of which the OTC is an integral part, has taken the position that the product of its approval process must meet the standards that have been set. These standards are not, as is evident, cast in bronze or codified in an absolute way. Rather, we have elected to use the notions of reasonable adherence to 1) normally employed scientific criteria and 2) the requirements of defined reproducibility and demonstrable correctness of results. It is also clear that the MRB actions have at least the tacit approval of a major customer for DOE's test methods and results. This approval, and the agreement between the MRB approach and that used by the general scientific community when scientists' results are scrutinized (e.g., pre-publication review) all lead us to conclude that the bases for actions by the MRB are not off the mark.

There are, of course, consequences of such an affirmation of the standards that we have been using. Most evident is the frequency with which we reject submissions by the MCC. The OTC and the Panels have developed an extensive record, available to anyone, that defines in

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exquisite clarity and detail those aspects of submissions that were found to be unsatisfactory. I recommend that the critics of the MRB system read with some care what this record contains, and then determine if the criticisms put forth are substantive. My experience to date indicates that those who chide the MRB for a perceived inadequate performance have 1) no clear notion of what the standards are, 2) have realistic concerns that the work cannot pass a close scrutiny, or 3) have failed to appreciate the upcoming process of public examination of the technical products. The latter is, I believe, a most wide-spread deficiency.

In addition, and perhaps pertinent to the concern that the ONWI submissions may bog the system down, we reiterate that technically sloppy submissions when forwarded in large numbers, will be returned in large numbers and thus indeed may give the appearance of no progress, i.e., bogging the system down. We recommend that those responsible for submitting test methods become aware of their responsibility to provide sound material to the reviewing groups. In the case of the ONWI submissions, we observe that the MCC may be placed in a difficult role in that the MCC is not responsible for the initiation or much of the development of the test methods it is to submit to the MRB. Nonetheless, the MRB will continue to adhere to its standards and the MIO may need to ensure that the MCC is not unfairly accused of blocking schedules and missing milestones. It has been suggested that the OTC provide a pre-review for submissions that originate outside of the MCC. While we are prepared to help where we can, we do note that the MCC has had a long experience history with the OTC and the Panels, and should be fully aware of the concerns that arise in all of our reviews.

As the materials programs of DP, RW, and NE progress, we expect an increasing number of submissions to the MRB that have originated outside of the MCC. We strongly urge the MIO/MCC to recommend to those planning submissions to acquaint themselves with the bases that will be used in the review of their submissions. This activity could involve contact of submitters with the OTC for discussions, obtaining from the OTC copies of communications on the various submissions made by the MCC, and contact with the MCC for advice on submission format and contents. Most important, the submitters should carefully review the contents of their writings for accuracy of concepts, descriptions, and directions given to the experimenter, for attention to the precision/accuracy of results, for the inclusion of obvious connections between the submission and the repository systems, and for inclusion of a deliberate statement on the uses and limitations of the data.

In conclusion, we regret that critics of the MCC/MRB system have failed to discuss their concerns directly with us and allow us to share the bases of our conviction that the methodology and outcome of the MRB review are appropriate to the purpose of DOE's materials efforts. We believe that the approaches taken by us are appropriate and proper, and will serve the very purposes for which the MCO was established. We do not believe that our requirements pose needless expense or should taken

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excessive amounts of time since much of what we require of the submissions has been described in the context of sound science, clarity, and good quality assurance.

We are prepared to expand our comments on any of the above topics as you or others may require. Please contact Wally Seefeldt or me.

Sincerely,



Martin J. Steindler, Chairman
Materials Review Board
Chemical Technology Division

MJS:rr

cc: ~~MRB~~ Members
S. Vogler, ANL/MIO
J. Mendel, MCC