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Summary Meeting Notes

Status Briefing on the Division of Waste Management
Pilot Project
September 18, 1985
Silver Spring, Maryland

Background

The Nuclear Regulatory Commission (NRC) Division of Waste Management has undertaken a Pilot Project to demonstrate an issue (open item) tracking system and to test and further define requirements for a Licensing Information Management System (LIMS). The September 18th meeting was the first periodic public meeting to be held to present the progress of the Pilot Project. Attending the meeting were staff from the Division of Waste Management and other divisions and offices of NRC, representatives from the Department of Energy (DOE), the Yakima Indian Tribe, and both NRC and DOE contractors. A list of attendees is enclosed. Also enclosed are handouts provided at the meeting.

Summary of Presentation

Phil Altomare gave a historical background of the Division of Waste Management program and noted that there were three primary Pilot Project goals hoped to be achieved by the end of 1986.

- o to have in place an operational issue (open item) tracking system
- o to have defined the needed capabilities of a licensing records management system to support a three year high-level waste repository construction authorization hearing, and
- o to have an interim records management system operational that is capable of capturing, storing, searching, and retrieving full-text electronic records until a final system is developed and operational

The Division of Waste Management is coordinating the Pilot Project effort with two other NRC offices involved in automated data processing (ADP) systems and are also coordinating efforts with the DOE. The NRC Office of Administration has undertaken a long-term development project to integrate all of NRC's document handling activities through a Technical Information Management System (TIMS) and the Office of Resource Management is developing a Corporate Data Network (CDN) System to provide linked access and move efficient use of NRC data bases. The DOE is completing a Licensing Information System requirements analysis and plans that this system be capable of handling all licensing documentation for a high-level waste repository. This system is intended to serve DOE, NRC, states, Indian tribes, and the public. It was noted that the

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Division's present efforts are primarily involved with the Pilot Project; however, they are also examining the possibility of a negotiated rulemaking to standardize an electronic format for submittal of licensing documents and have interest in meeting with the DOE field offices, states, and Indian tribes as was done last year to discuss progress and items such as adaptation of common vocabulary (key words) to make storage and retrieval of pertinent licensing documents more effective and dependable. They are also giving consideration to sponsoring a technical conference on document management systems to be held in the spring.

Two areas were mentioned as needing special attention during the Pilot Project: establishing the extent and process for interaction between DOE, NRC, states, and Indian tribes for a Licensing Information Management System; and obtaining an efficient method for electronic storage and retrieval of graphical and other non-text type material.

Avi Bender presented the purpose and status of the Pilot Project (see enclosed viewgraphs). He described present plans for the Pilot Project to demonstrate full-text document and electronic storage and retrieval which will be completed by the end of November, to demonstrate the HLW Tracking System on an IBM network and to establish the NRC requirements for a system that would support a three-year high-level waste repository construction authorization hearing.

Discussion Highlights

The primary discussion of the meeting concerned participation of the various parties in the Licensing Information Management System. Some of the main points covered in these discussions are given below.

Mr. Charles Head, DOE, raised the topic of states and Indian tribes entering information into the Licensing Information System data base and asked if their files would then be called for in discovery. Mr. Olmstead, NRC Executive Legal Division (ELD), stated his preference that all parties records to be used in the licensing hearing be included in one system. This could substantially reduce the time required for discovery and thereby help in meeting the three year licensing hearing period. However, all participating parties will not be finally identified until the hearing process begins. He indicated that unless development of an automated system started soon that the ability to retrieve records would continually fall behind the demand for records as it takes considerable lead time to develop and operate an information management system of this size and complexity. The key he thought was to get all records into the public domain as soon as possible and to make them accessible to all parties. In this way they would not have to be "discovered" as they would be already available. He encouraged all participants to get together for a common information management system. When asked by Mr. Altomare whether the proposed negotiated rulemaking should be expanded to include the concept of a centralized records data base. Mr. Olmstead stated that he thought it should.

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Mr. Olmstead emphasized during the meeting that states and Indian tribes should be parties to the negotiations for rulemaking as well as DOE.

Mr. Dean Tousley was asked his opinion of a centralized data base. Mr. Tousley noted that this is a new concept which he had not had time to think about but it seemed to be a good idea and appeared to have the ability to handle records in a short time. He expressed concern, however, over protecting records from alteration and also in having privileged, proprietary, confidential, or otherwise potentially non-discoverable materials in a single system under the control of the DOE. Mr. Altomare noted that there are technical advances being made which provide greater protection against tampering, such as laser (optical) disk records, and that there are optional ways to handle records to ensure security such as controlled access or maintaining privileged material in compatible but separate systems under individual control. Subsequent to the public meeting, Mr. Tousley submitted a letter further discussing his views (copy attached).

Mr. Tousley indicated that he was unclear as to where NRC and DOE are now in regard to a common information management system. What is NRC going to do? What is DOE going to do? How will requirements generated by NRC be used by DOE? Mr. Altomare stated that DOE has a requirements study on-going; so does NRC, with a demonstration phase as part of it. When these are done, they can be interfaced to support a common information management system, one that will support the needs of all parties, DOE, NRC, states, Indian tribes, and any other involved parties. Mr. Olmstead told the meeting participants that Ben Rusche, Director, Office of Civilian Radioactive Waste Management, has told the Commission that he will fund one information management system and that he wants a cost efficient one that meets all requirements. He is committed to an information management system.

Mr. Tousley also informed the group that the State of Washington already has an issue tracking program using RBase 4000 software. The Yakima Tribe will adopt this system, and other states are considering tracking systems as well.

The meeting concluded at 11:00 a.m. Future status meetings will be held on an approximate quarterly time period.

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2001 S STREET, N.W.

SUITE 430

WASHINGTON, D.C. 20009-1125

GAIL MCGREEVY HARMON
ELLYN R. WEISS
DIANE CURRAN
DEAN R. TOUSLEY
ANDREA C. FERSTER

TELEPHONE
(202) 326-3500

October 9, 1985

Mr. William J. Olmstead, Director
Regulations Division
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Scope of Repository Licensing Information System

Dear Mr. Olmstead:

At the September 18, 1985 NRC Staff Briefing in Silver Spring on its issues tracking and information management systems, you suggested a degree of comprehensiveness for a proposed unitary licensing information system which the Yakima Indian Nation considers unacceptable. To be precise, you opined that:

- to meet a 36 month licensing period, there would only be 3 months available for completion of discovery;
- to make such a short discovery period feasible, everybody would need access to everybody else's database ahead of time, so there should only be one;
- to expedite resolution of discovery disputes, the comprehensive database must include putatively privileged as well as obviously discoverable materials of all the "parties", including states and tribes.

As I was the only representative from the public present, you asked me to react to this idea. I said that a unitary system sounded advantageous, but that asking states and tribes to submit privileged materials, such as litigation strategy documents, to it would pose significant problems. I believe I also suggested that the ability to transmit documents electronically would provide a more acceptable means of quickly producing disputed materials when they are ordered to be produced.

Because this is a very important issue, the Yakima Nation Nuclear Waste Program has authorized me to memorialize and amplify my ad hoc response to it at the September 18 meeting. As a threshold matter, we do not accept the premise that the statutory licensing period permits only three months for

*Make sure mail
room notes copied
to Miller, etc.
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10/15/85*

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discovery in such a complicated proceeding as repository licensing will certainly be.

Even with the most optimistic assumptions about early resolution of issues and availability of information, it would be wild speculation to conclude in advance of licensing time that the state of resolution of issues for all potential parties will permit such a short discovery period. As you alluded at the meeting, all possible parties will not be states or Indian tribes eligible for consultation and cooperation and funding under the NWPA. Moreover, if DOE continues to be largely unresponsive to the concerns of states and tribes, the consultation and cooperation process may be unsuccessful in resolving the issues of those governments. The due process rights of interested parties cannot be sacrificed to meet an arbitrary schedule, as I am sure you are aware. Surely NRC would not take the position that the statutory date would compel the agency to issue a decision if the record is not complete at that time. Similarly, my clients do not accept that their rights can be restricted in this manner. Ultimately, the timing of discovery will have to abide the determination of a Licensing Board with the advice of the actual parties to the proceeding at that time.

As a general proposition, the Yakima Nation agrees with the need for a single repository licensing information management system which is accessible to all interested parties and the public. Because of the geographically disparate elements of the Yakima Nuclear Waste Program, we have found it necessary to rely heavily on electronic media and electronic mail to facilitate our participation in this program for the past year. As I explained briefly at the September 18 meeting, we are developing small-scale information and issues management systems for our own internal project management purposes. We cannot develop anything like the comprehensive, full-text systems being developed by the federal agencies, nor should we.

We look forward to the time when we can gain access to those systems in aid of our own research and review. Since our external communications and formal submissions are already in electronic form, we are prepared to begin submitting them electronically for inclusion in a unitary system immediately. However, the availability of such a unitary federal system, and our two-way participation in it with respect to formal external communications, will not obviate the need for continuing operation of "proprietary" systems in aid of our program management.

The unacceptable aspect of your suggestion in this regard is the idea that a comprehensive licensing information system must

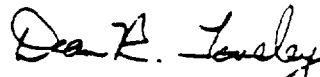
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include privileged, proprietary, confidential, or otherwise potentially non-discoverable materials in a supposedly secure portion of the system as well as final, public, discoverable ones, so that when discovery disputes are resolved by a Licensing Board, the disputed materials can be produced instantaneously. To begin with, the time-consuming aspect of discovery is arguing about releasability and preparing responses to it, not actually delivering the material once it is ordered to be produced. Automated information systems should be very helpful in preparing responses to discovery requests. Motions to Compel and answers thereto, as well as the text of the disputed materials, could be submitted to the Licensing Board electronically, thus eliminating mail transit time. Likewise, if the Board ordered production, transmission could immediately be affected electronically from the "proprietary" system of the party in possession to the other parties. Thus, the "problem" which you have identified--the need to quickly produce disputed materials when so ordered--does not require the very extraordinary and intrusive remedy that you suggested.

You were in attendance at the recent Commission meeting on the interpretation of NHPA section 114(f). The subject of that meeting was quite narrow, but you may have noted from the tone of that meeting and subsequent congressional hearings on DOE's Mission Plan that DOE is not having much success to date at engendering trust from affected states and Indian tribes. As you correctly noted on September 18, the level of trust that would be required to get states and tribes to entrust their privileged communications to a database system managed by DOE would be very high. I submit to you that, unless drastic changes occur, that necessary trust is absent.

Sincerely yours,



Dean R. Tousley

ASSOCIATE ATTORNEY FOR
THE YAKIMA INDIAN NATION

cc: Robert Browning, Director
Catherine Russell, State/Tribal Liaison
Melvin Sampson
Russell Jim
James B. Hovis

DIVISION OF WASTE MANAGEMENT
PILOT PROJECT BRIEFING

SEPTEMBER 1985

PHILIP ALTOMARE
AVI BENDER
REGGIE BROWN

DWM PILOT PROJECT BRIEFING

9/18/85
85/09/17

PURPOSE AND AGENDA

PURPOSE - PROVIDE OVERVIEW AND STATUS OF THE DWM PILOT PROJECT

AGENDA

- PURPOSE OF PILOT PROJECT
- ISSUE MANAGEMENT AND TRACKING SYSTEM
- LICENSING INFORMATION MANAGEMENT SYSTEM
- NEWLY ACQUIRED COMPUTER EQUIPMENT
- FUTURE EVENTS

PURPOSE OF PILOT PROJECT

WHAT

- DEMONSTRATE AN ISSUE MANAGEMENT AND TRACKING SYSTEM
 - IDENTIFY, TRACK, AND RESOLVE LICENSING CONCERNS
 - COMPUTER BASED OPERATION
 - INTEGRATED WITH LICENSING INFORMATION MANAGEMENT SYSTEM
- DEMONSTRATE A LICENSING INFORMATION MANAGEMENT SYSTEM
 - FULL TEXT STORAGE AND RETRIEVAL OF NRC HLW RECORDS
 - STATE-OF-THE-ART INFORMATION PROCESSING TECHNOLOGIES
 - ON-LINE ACCESS TO DOE RECORDS

WHY

- ACHIEVE COMMISSION'S STATUTORY 3 YEAR LICENSE REVIEW
 - RESOLVE ISSUES PRIOR TO APPLICATION
 - OBVIATE NEED TO RELY ON DISCOVERY
 - DEFINE NRC'S REQUIREMENTS FOR ACCESSING RECORDS (DOE'S AND NRC'S)
- FACILITATE NRC'S STAFF ACCESS TO CURRENT DOE/NRC RECORDS

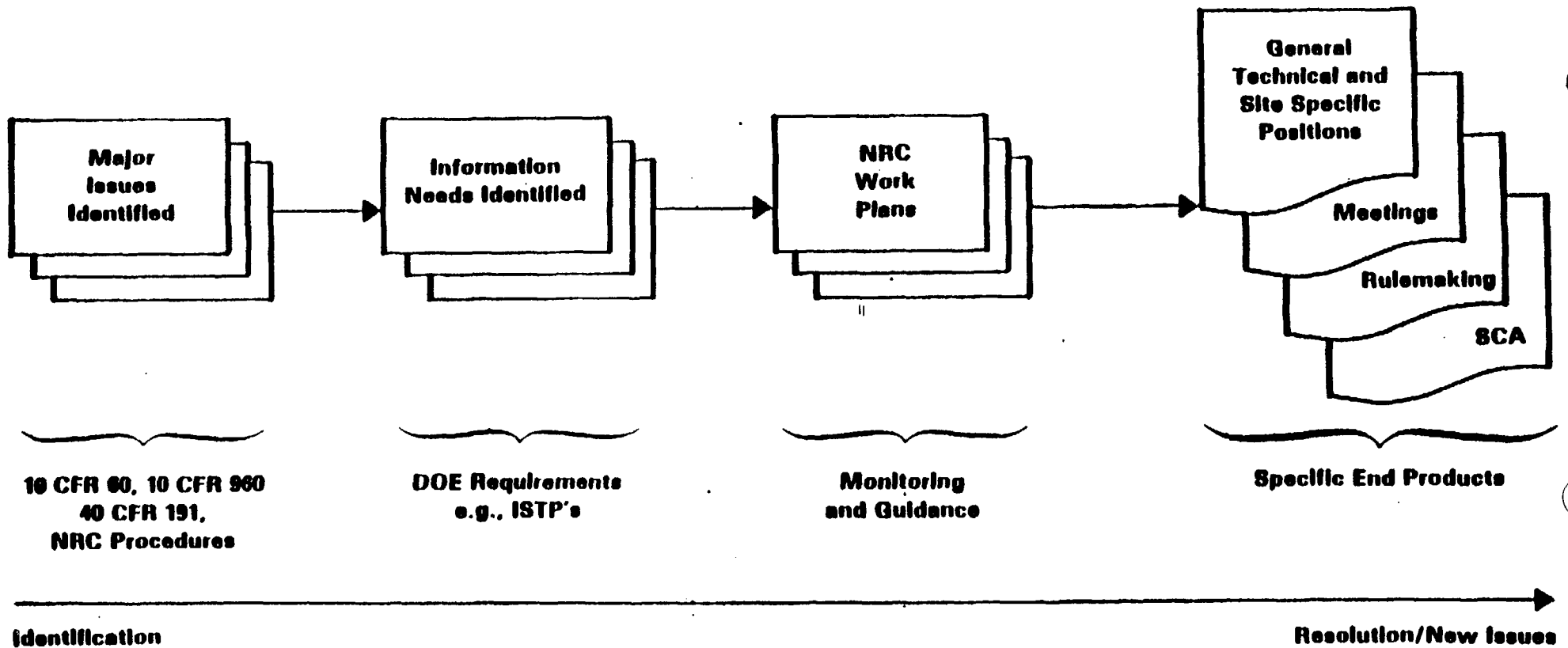
STATUS

- PILOT PROGRAM OPERATING PLAN COMPLETE
- PROTOTYPE OF ISSUE SYSTEM DEVELOPED ON IBM PC
- INITIAL DEMONSTRATION ON WASTE PACKAGE AND GEOPHYSICS ISSUES (NEVADA TEST SITE)
 - WHAT ARE THE ISSUES
 - WHAT DO WE TRACK
 - LEVEL DETAIL
- FULL TEXT RECORDS BEING CONVERTED TO ELECTRONIC MEDIA
 - OPTICAL CHARACTER READER
 - DISKETTES
 - HARD COPY
- EQUIPMENT INSTALLED AND OPERATING

ISSUE MANAGEMENT AND TRACKING OBJECTIVES

- ACTIVELY IDENTIFY HLW ISSUES WHICH MUST BE RESOLVED BY DOE/NRC
- TRACK AND DOCUMENT STEPS TAKEN BY NRC/DOE TO IDENTIFY, TRACK, AND RESOLVE LICENSING CONCERNS
- MAKE CURRENT STATUS OF ISSUE RESOLUTION ACCESSIBLE TO NRC,DOE, STATES, TRIBES, AND OTHER ORGANIZATIONS
- LINK TO FULL TEXT STORAGE AND RETRIEVAL SYSTEM

TRACKING PROCESS



ISSUE EXAMPLE/PILOT PROJECT

CONCERN: WASTE PACKAGE

Concern: DOE may not be adequately considering non-uniform corrosion failure mechanisms for the waste package

Initial Identification: October 18-19, 1983 Workshop Summary Notes; see also NRC Yucca Mountain EA Review Comments 10 and 6.114 (3-20-85)

Background: Current DOE and NRC tests are not showing evidence of pitting or stress corrosion cracking. However, prior applications of stainless steels have shown intergranular stress corrosion cracking in a gamma field at 100-300°C and another application shows transgranular stress corrosion cracking in water/steam environments containing chloride-ions. Based on this, there appears to be potential for stress corrosion cracking with austenitic steels in the repository environment.

Key Words: Corrosion failure mechanisms, stress corrosion cracking, pitting corrosion, waste package canisters, austenitic stainless steel

Status: LLNL Metal-Barrier Testing addresses corrosion rates and mechanisms. NRC restated that serious consideration should be given by DOE to changing emphasis from austenitic stainless steel to high-Ni alloys with fewer documented failure mechanism at the NNWSI/NRC Workshop on 7-23 and 24-85.

Milestones: NNWSI Performance Assessment Workshop (October 1985)
Location and date TBD

References: NUREG/CR-2333, Vol. 4 (Section 5.) February 1982
NRC-NNWSI Project Waste Package Meeting Summary,
July 23-24, 1985.
LLNL, Livermore, CA
UCRL-92311 Preprint, R.S. Glass et.al., LLNL, February 1985
Waste Package Environmental Assessment NRC Comments 10 and 6.114 (3-20-85)

Prepared by: T. Jungling/WMEG

Regulation: 10 CFR 60.113
(300-1000 yr. containment)

RP Project Officer: K. Stablein/WMRP

DOE WMS No.: 2.2.3.2L

Site: NNWSI

NRC Work Plan No.: EG12

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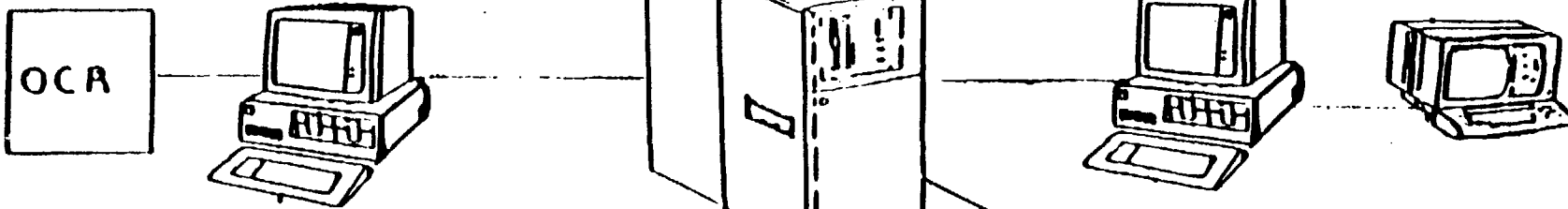
DWM LICENSING INFORMATION MANAGEMENT SYSTEM

- FULL TEXT STORAGE AND RETRIEVAL OF NRC RECORDS
 - SEARCH ON TEXT, AUTHOR, SUBJECT, KEY WORDS...
 - PRINT FULL TEXT (WITHOUT IMAGES INITIALLY)
 - PARTIAL AUTOMATION OF DCC
 - NNWSI RECORDS
 - CONGRESSIONAL Q'S & A'S
 - REMOTE ACCESS TO DCC
 - LOCAL TERMINALS/PRINTERS
 - LAS VEGAS
 - REQUIREMENTS THAT MUST BE SATISFIED BY DOE'S SYSTEM
- (

GENERAL SYSTEM REQUIREMENTS FOR LICENSING IMS

- Comprehensive Content *store information in retrievable form meeting 10 CFR 2.740*
- Multi-media Accommodation *store information in many forms*
- Broad Indexing Capability *search and select on key descriptors*
- Prompt Response *produce hard copy within 5 days*
- Operational Availability *partially in prelicensing, full operation by licensing*
- Security *protect against loss or destruction*
- Related Systems Disclosure *description and instruction available to users*
- Simplicity to Use *user friendly*
- Long-Term Viability *capable of being up-graded*
- Accessibility *provide terminals in LPDRs*

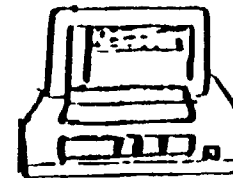
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CONTROLLER (ROOM 622)



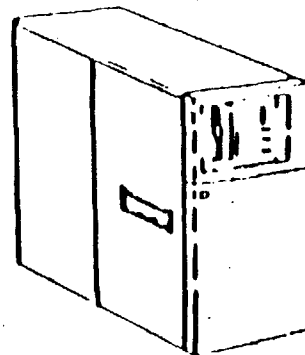
DIRECT ACCESS TO:

- NRC RECORDS (DCC)
- ISSUE SYSTEM
- DOE RECORDS

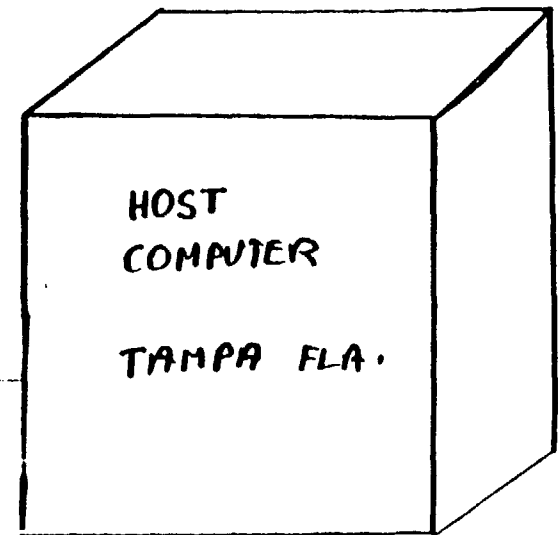
9600 BPS



CONTROLLER
(TAMPA)



HOST
COMPUTER
TAMPA FLA.



FUTURE EVENTS

- DEMONSTRATE ACCESS TO LICENSING INFORMATION MANAGEMENT SYSTEM
(BY END OF NOVEMBER)
- DEMONSTRATE ACCESS TO ISSUE SYSTEM ON IBM NETWORK
- DEFINE NRC REQUIREMENTS A SYSTEM NEEDED TO SUPPORT THREE-YEAR LICENSING
- DETERMINE HOW TO FULLY IMPLEMENT SYSTEM TO HANDLE NRC RECORDS

PHIL ALTOMARE BRIEFING NOTES

DIVISION OF WASTE MANAGEMENT LICENSING DOCUMENT AND ISSUE MANAGEMENT SYSTEM

Background

- 0 Began to focus on problem in spring of last year
 - Increasing requirement for manual file space and staff
 - Growing cost in staff time to satisfy FOIA request
 - Difficulty in meeting discovery requirements for three-year licensing hearing with magnitude of documents involved
 - Need for an issue tracking system
- 0 Initiated contract support with Aerospace Corporation
- 0 Met with DOE Field Offices and DOE Headquarters concerning available system (meeting included states and Indian Tribes)
- 0 Systems identified basically used indexing, bibliographic data and abstracts, with some keyword search capability, and hard copy or microfiche documents
- 0 No system systematically collecting documents using full text electronic storage with electronic search and retrieval capability (No automated data processing integrated office systems)
- 0 DOE had no Issue Tracking System, other systems available were not directly adaptable
- 0 Meeting with other groups investigating or using document management systems: Patent Office, House of Representatives, Department of Agriculture, vendors

Needs

- 0 Operational issue tracking system
- 0 Requirements for a records management system to support three-year licensing
- 0 Interim operational system until full system is on line

PHIL ALTOMARE BRIEFING NOTES

Status (Avi and Reggie presentation)

0 Pilot Project

- Initiated by piggy backing RM/Commission IBM Timesharing System

0 Issue Tracking System

- Requirements Analysis
- Draft Procedures
- Prototype issue tracking computer program using DBASE III
- Repository Projects Branch working on Technical issues and level of detail
- Converting Program to Pilot Project software

0 Licensing Records Management System

- Draft Requirements Analysis
- Draft Pilot Project Operating Plan
- Pilot Project going operational
 - Full text search and retrieval through STAIRS, descriptors included
 - Customizing for transfer of IBM 5520 word processor documents directly to STAIRS
 - Optical Character Reader in system
 - Some networking concept: data base at Tampa, FL; software tie in to existing NRC Document Control System (DCS); communication with PC's at NRC Nevada Office and DOE SRPO document data base; EPA and DOE PC/5520 communication.

Coordination

0 Office of Resource Management

- ADP Equipment
- Corporate Data Network Development

0 Office of Administration

- Technical Information Management System (TIMS) development
- Present licensing document archive

0 DOE

- Meetings
- DOE developing a system capable of serving all users including NRC, states, and Indian Tribes
- Need more interaction

PHIL ALTOMARE BRIEFING NOTES

Plans

0 Pilot Project

- Complete system
- Prepare procedures/test/revise
- Operations
- Mid-evaluation/revisions
- Evaluation/recommendations
- Specify system capabilities

0 Standardized electronic format (embedded control characters)

- Commission paper
- NRC/DOE/OMB negotiated rulemaking
- Contractor products

0 National meeting(s)

- Common vocabulary/key words/descriptors
- Joint effort to develop a trustworthy, comprehensive system
- Technical Conference

Areas for Special Attention

0 DOE, NRC, States and Indian Tribes system interfacing

0 Electronic storage/retrieval of graphic and other non-text records

GENERAL SYS REQUIREMENTS IMS

GENERAL SYSTEM REQUIREMENTS FOR LICENSING IMS

1. COMPREHENSIVE CONTENT: Store and be able to retrieve any records relevant to the licensing of the high level waste repository, including requestable or discoverable records or partial content of a record.
2. MULTI-MEDIA ACCOMMODATION: Store, index, and provide access to records in hard copy, microfiche, charts, magnetic tape, disc, and other accessible media.
3. BROAD INDEXING CAPABILITY: Be able to search and select on key words or descriptor phrases that define subject, and on author, title, significant words in context in abstracts and text, date, issuing agency identifying number, and other necessary identifiers.
4. PROMPT RESPONSE: Verify the existence of a record, determine the location of a record, and display text of records resident in the data base in real time at authorized user's terminals. Produce hard copy of any record within five working days.
5. OPERATIONAL AVAILABILITY: Make the IMS available as soon as possible, incrementally during prelicensing and in operational form during licensing.
6. SECURITY: Protect against the loss and destruction of records.
7. RELATED SYSTEMS DISCLOSURE: Disseminate general descriptions of information available on all automated information management systems maintained within the DOE community related to high level waste. Provide instructions for users access to systems and provide a thesaurus of key words and descriptors to facilitate the user's queries.
8. SIMPLICITY OF USE: Provide access (read and print only) for non-technical users who have no prior data base interaction experience.
9. LONG-TERM VIABILITY: Be capable of being updated to improve service throughout the licensing period.
10. ACCESSIBILITY: Accessible to States, Indian Tribes, members of the public and other agencies.

9/18/85

<u>NAME</u>	<u>AFFILIATION</u>	<u>ADDRESS</u>
Avi Bender	NRC/DWM	
Dean Tousley	Yakima Nation	2001 S St, NW #430 Wash, DC 20009
M. J. Wise	SAIC/McLean	1710 Goodridge Dr McLean, VA 22102
Reggie Brown	NRC/WM	
Michael Tokar	NRC/WM	
Sher Bahadur	NRC/WM	
Laurana McCants	Aerospace	L'Enfant Plaza, SW
Sharon Root	NRC/WM	
Ruth Chiang Carter	NRC/WM	
Gerald Paulsen	RM/D	
Bill Olmstead	OELD	
Charles Head	DOE/RW-23	
King Stablein	NRC/WM	
T. Johnson	NRC/WM	
Donna Mattson	NRC/WM	
Ron Johnson	Aerospace	
Frank Malone	ORM	
Edmund A. Vierzba	Aerospace Corp	
John Voglewede	NRC/WMEG	
Chad Glenn	NRC/WMRP	
Stuart Treby	NRC/ELD	
Chip Cameron	NRC/ELD	
Steve Scott	NRC/TIDC	
William J. Besaw	NRC/TIDC	
Mike Collins	NRC/TIDC	