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Mr. Ralph Stein
RW-23
G-465/GTN
U. S. Department of Energy
Washington, D.C. 20545

Dear Mr. Stein:

I have received your May 24th summary of the May 10th NRC and DOE licensing document management systems meeting. The changes requested are generally acceptable except that we (Bill Olmstead and myself) feel that the conclusion that "...the system described by DOE will generally meet NRC's requirement..." should not be included. There were several concerns expressed during the May 10th meeting that would be contrary to this conclusion, particularly as to whether the licensing document management system presented by DOE would satisfy the Nuclear Waste Policy Act requirement for a three year construction authorization license review.

The Nuclear Waste Policy Act of 1982 directs the NRC to complete a licensing hearing for a high-level waste repository construction authorization in three years. NRC planning for a licensing hearing in this timeframe requires the "discovery" process to be completed in approximately three months. This could only be accomplished if all pertinent data and documents had been previously identified, could be rapidly located and retrieved, and were available to all interested parties with sufficient time for their review and evaluation. An efficient and technologically current automated document management system must be implemented as soon as possible to satisfy this requirement.

Major concerns expressed as to whether the DOE approach would support a three year licensing were: the system should be accessible by the States, Indian tribes, and members of the public; the system(s) should be designed to include NRC, States, and Indian tribes documents as well as DOE's; the proposed mailing of documents from distributed document repositories is not conducive to an expedited hearing, particularly if several search and document reviews are required; there is a question as to whether a licensing information system that has only key words and abstracts available for computerized search could have quick enough response to avoid impacting discovery schedules. These concerns are included in the meeting report.

OFC	WMPC	OELD	WMPC	WM			
NAME	PAltomare:dh	WOlmstead	JOBunting	REBrowning			
DATE	85/06/07						

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There appears to have been an interpretation that NRC is recommending all pertinent documents, past and future, be stored in full text machine readable format. As a point of clarification, NRC staff believes that it would be prohibitively expensive to retrofit a system to full text machine readable storage, except in special cases. Existing data and documents will more appropriately be handled by indexing, keywording, and abstracting. However, preparation of machine readable copy is becoming a standard office and publication practice. Therefore, full text storage and retrieval information handling advantages should be considered in any new document management system development. The Division of Waste Management has initiated a full text document management pilot program and, as requested, will involve DOE to the maximum extent possible.

I have enclosed a signed copy of the May 10th meeting report as well as a mark up of the copy you sent to indicate where changes have been made. Please contact me if you have any questions.

/s/

Philip M. Altomare, Section Leader
Program Planning Section
Policy and Program Control Branch
Division of Waste Management

Enclosures:
As Stated

cc: Charles Head, DOE

OFC	:WMPC	:OGC	:WMPC	:WM	:	:	:
NAME	:PAltomare:dh	WOlmstead	:JOBunting	:REBrowning	:	:	:
DATE	:85/06/07	: 6/10/85	: 6/11/85	: 6/12/85	:	:	:

Meeting Report

Purpose: This meeting was arranged to provide DOE and NRC with an opportunity to update one another their respective activities associated with development of information storage and retrieval systems to support licensing of a Geologic Repository.

Date: May 10, 1985

Place: DOE Headquarters
Washington, DC

Attendees:

DOE	NRC
Ralph Stein	Bill Olmstead
Bob Purple	Phil Altomare
Charles Head	Avi Bender
Dick August	Reggie Brown
Colleen Ostrowski	Maxine Dunkelman
Stan Echols	
Weston	**Aerospace**
Dave Siefken	Randi Lie
Tim O'Donnell	J. Woodford
SAI	**Consultant**
Bill MacNabb	John Jordan
	Environmental Policy Institute
	David Berick

Discussion:

1. Charles Head presented an overview briefing describing the concept of the licensing information system which DOE has developed (copies of vugraphs used are attached). The main parts of the system are as follows:

   a. It would be a distributed system composed of complimentary data indices and archives at DOE-HQ and each of the four repository project offices.

   b. It would consist of a computerized index of regulations, documents, issues, and commitments, with a corresponding archive of document hard copies, microfiche, and physical records such as core borings, magnetic tapes, etc.

c. The distributed indices would be addressable remotely using personal computers of equivalent terminals communicating over telephone lines with the computers that control the indices.

d. All information collection, indexing, key wording, abstracting, storage, and retrieval of hard copies would be done by document control staffs at the five DOE locations.

e. All five DOE locations, the NRC, and others such as the States and Indian Tribes would be able to access the system, although the time and manner for access by non-DOE offices has not yet been defined.

DOE is in the final stages of developing the system specification and hopes to start system design and further implementation soon.

2. NRC, Phil Altomare and Avi Bender, gave a presentation which summarized concerns raised in the NRC/DOE meeting of February 8, 1985, and recommended approaches to previous unresolved information management system issues (copies of viewgraphs are enclosed)

Major points raised by NRC during the presentation and following discussion are as follows:

a. NRC's intention is to meet the Nuclear Waste Policy Act directive to review a high-level waste license application and reach a licensing decision within three years. To accomplish this, early identification and tracking of issues and a good document management system will be required.

b. NRC recommended that DOE include NRC, the States, and Indian Tribes as contributors as well as users of the document management system they are developing.

c. The relative merits of bibliographic and abstract versus full text search were discussed. Several advantages of full text search were noted, both as regards satisfying hearing "discovery" requirements and the considerable advantage to management in ability to review a program progress and keep it on track.

d. NRC personnel discussed the hearing process and the particular problems of discovery. Concern was expressed as to whether DOE was developing a system that would be able to meet the licensing requirements without delays that would affect a three year review timeframe.

e. DOE was questioned as to whether there would be consistency between the field officers and Headquarters in the document management system, particularly as regards common indexing, abstracting, and descriptors for retrieving documents from the data base. DOE is planning consistent, compatible systems. NRC suggested that there be coordination between DOE, NRC, the States, and Indian Tribes in establishing a common indexing and descriptor vocabulary.

3. During and after the presentations summarized above, numerous points concerning the collection, storage, and retrieval of licensing information were discussed, including the following:

a. During the discussion of the use of the licensing information system, Bill Olmstead provided several useful observations concerning the discovery process, including the following:

1) If DOE establishes and makes available to the public, a system that allows the public to access all program records, that act satisfies the requirements for discovery during the licensing process. However, if DOE employees, offices, or contractors also keep separate files that are not sub-sets of the system made available to the public, then those systems are also subject to discovery.

2) Any licensing information system that is capable of identifying and retrieving data in a timeframe that allows the licensing process to be completed in three years would be acceptable, whether it had full on-line text search and retrieval or was a simpler computerized abstract system such as DOE is considering. However, Bill Olmstead questioned whether a licensing information system that has only key words and abstracts available for computerized search could have quick enough response to avoid impacting discovery schedules. Several limitations of the computerized abstract approach were identified, including the potential that a user of the system would require several passes through the system to track down references and other related supporting documents.

3) A possible approach might be to employ full on-line text search and retrieval for future records and use the computerized abstract approach for the backing of past records.

b. David Berick made the following comments:

1) He stated that the various sources of defense high-level waste should be included in the system since he considers that information concerning the nature and origin of the defense waste will be needed in the repository licensing process.

2) He commented that the West Valley waste should be covered by the system.

3) He noted that DOE is obligated under the Nuclear Waste Policy Act (Sec. 117(a)) to provide information to State governments and Indian Tribes within 30 days of receipt of the request. He noted that any licensing information system established by DOE should also be able to meet this requirement to preclude the need for a separate system.

Conclusion: DOE and NRC agreed that they must continue to coordinate their activities as the two agencies continue their licensing information system activities, with the intent of developing a system to serve both agencies. NRC agreed to continue to keep DOE informed of their pilot project activities and to involve DOE in the pilot project to the maximum extent practicable. DOE should consider how it will meet discovery requirements and whether full text retrieval should be incorporated into the development.

DOE

NRC

PC Code: mtg.rpt
Mach C

Meeting Report

Purpose: This meeting was arranged to provide DOE and NRC with an opportunity to update one another their respective activities associated with development of information storage and retrieval systems to support licensing of a Geologic Repository.

Date: May 10, 1985

Place: DOE Headquarters
Washington, D.C.

Attendees:

DOE	NRC
Ralph Stein	Bill Olmsted
Bob Purple	Phil Altomare
Charles Head	Avi Bender
Dick August	Reggie Brown
Colleen Ostrowski	Maxine Dunkelman
Stan Echols	

Weston	Aerospace
Dave Siefken	Randi Lie
Tim O'Donnell	J. Woodford

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David Berick

Discussion:

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   b. It would consist of a computerized index of regulations, documents, issue and commitments, with a corresponding archive of document hard copies, microfische, and physical records such as core borings, magnetic tapes, etc.

(1) Added by R. Stein to C. Head and P. Altomare draft of May 10, 1985

Enclosure 2

c. The distributed indices woulde be addressable remotely using personal computers or equivalent terminals communicating over telephone lines with the computers that control the indices.

d. All information collection, indexing, key wording, abstracting, storage and retrieval of hard copies would be done by document control staffs at the five DOE locations.

e. All five DOE locations, the NRC, and others such as the States and Indian Tribes would be able to access the system, although the time and manner for access by non-DOE offices has not yet been defined.

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a. NRC's intention is to meet the Nuclear Waste Policy Act directive to review a high-level waste license application and reach a licensing decision within 3 years. To accomplish this, early identification and tracking of issues and a good document management system will be required.

b. NRC recommended that DOE include NRC, the States and Indian tribes as contributors as well as users of the document management system they are developing.

c. The relative merits of bibliographic and abstracts versus full text search were discussed several advantages of full text search were noted, both as regards satisfying hearing "discovery" requirements and the considerable advantage to management in ability to review a program progress and keep it on track.

d. NRC personnel discussed the hearing process and the particular problems of discovery. Concern was expressed as to whether DOE was developing a system that ~~this~~ would be able to meet the licensing requirements without delays ~~this~~ that would affect a 3 ~~years~~ review timeframe.

e. DOE was questioned as to whether there would be consistency between the field officers and Headquarters in the documents management system, particularly as regards common indexing, abstracting, and ~~descriptions~~ descriptors for retrieving documents from the data base. DOE is planning consistent, compatible systems. NRC suggested that there be coordination between DOE, NRC, the States and Indian tribes in establishing a common indexing and ~~description~~ descriptor vocabulary.

3. [During and after the presentations summarized above, numerous points concerning the collection, storage and retrieval of licensing information were discussed, including the following:] (1)

a. During the discussion of the use of the licensing information system, Bill Olmsted provided several useful observations concerning the discovery process, including the following:

1) If DOE establishes, and makes available to the public, a system that allows the public to access all program records, that act satisfies the requirements for discovery during the licensing process. However, if DOE employees, offices or contractors also keep separate files that are not sub-sets of the system made available to the public, then those systems are also subject to discovery.

[2) Any licensing information system that is capable of identifying and retrieving data in a timeframe that allows the licensing process to be completed in three years would be acceptable, whether it had full on-line text search and retrieval or was a simpler computerized abstract system such as DOE is considering.] (1) Several limitations of the computerized abstract approach were identified, including the potential that a user of the system would require several passes through the system to track down references and other related supporting documents.

However, Bill Olmstead questioned whether a licensing information system that has only key words and abstracts available for computerized search could have quick enough response to avoid impacting discovery schedules.

(1)

3) A possible ~~compromise~~ approach might be to employ full on-line text search and retrieval for future records, and use the computerized abstract approach for the backlog of past records.

b. David Berick made the following comemnts:

1) He stated that the various sources of defense high-level waste should be included in the system since he considers that information concerning the nature and origin of the defense waste will be needed in the repository licensing process.

2) He commented that the West Valley waste should be covered by the system.

3) He noted that DOE is obligated under the Nuclear Waste Policy Act (Sec. 117(a)) to provide information to State governments and Indian Tribes within 30 days of receipt of the request. He noted that any licensing information system established by DOE should also be able to meet this requirement to preclude the need for a separate system.

Conclusion: DOE and NRC agreed that they must continue to coordinate their activities as the two agencies continue their licensing information system activities, with the intent of developing a system to serve both agencies. NRC agreed to continue to keep DOE informed of their pilot project activities and to involve DOE in the pilot project to the maximum extent practicable. ~~Further, the system described by DOE will generally meet NRC's requirement and should be further developed as planned~~. DOE should consider how it will meet discovery requirements and whether full text retrieval should be incorporated into the development. (1)

DOE

NRC

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