University of California Lawrence Livermore NUCLEAR WASTE MANAGEMENT PROGRAMi CONTROLLED COPY NOOOS9 Subject APPENDIX G - "REQUIREMENTS FOR QUALIFICATION OF EXISTING DATA NOT GENERATED UNDER A QA PROGRAM MEETING THEREQUIREMENTS OF 10 CFR 60, SUBPART	No.: 033-YMP-R Appendix G Revision: 0 Date: December 15, 1988 Page: of 1 2 Approved: FEB 10 1985 G"				
Approved by: <u>Jalla 1720/88</u> Approved by Date Yucca Mountain Project Leader	: <u>R.M.S. full 1</u> 2/16/88 Date Quality Assurance Manager				
1.0 GENERAL This appendix provides requirements for the qualif that will be needed to support a license applicati initially generated under a QA Program meeting the Subpart G.	Fication of existing data, Lon, which have not been e requirements of 10CFR60,				
 2.0 METHODS FOR QUALIFICATION OF EXISTING DATA 2.1 Four methods or combinations of methods are a qualifying existing data: a. The execution of the peer review process in requirements of Appendix J of this QAPP. 	acceptable for the process of n accordance with the				
b. The use of corroborating data which is defined as existing data used to support or substantiate other existing data. Inferences drawn to corroborate the existing data are clearly identified, justified, and documented. The level of confidence associated with corroborating data is related to the quality of the program under which it was developed and the number of independent data sets. The amount of corroborating data needed is dealt with on a case-by-case basis in the documented reviews for qualification.					
c. The use of confirmatory testing which is defined as testing conducted under a lOCFR60, Subpart G QA program which investigates the properties of interest (e.g., physical, chemical, geologic mechanical) of an existing data base. One example of confirmatory testing is testing conducted under the same environmental conditions and with similar or the same procedures, test material, and equipment as the original test which generated the existing data. Another type of confirmatory testing is testing conducted by different test methods and equipment but which still investigates the same parameter of interest. The amount of confirmatory testing required is dealt with on a case-by-case basis in the documented reviews for qualification.					
d. Demonstrating that the existing data was co which is equivalent to a 10 CFR 60, Subpart 9210260187 921013 PDR WASTE WM-11	ollected under a QA program t G QA program.				

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3.0 SELECTION AND DOCUMENTATION OF QUALIFICATION METHODOLOGY

3.1 When the methods indicated in Sections 2.1b, 2.1c, and 2.1d are utilized to qualify existing data, a technical review is conducted to support the quality of the data. Additional confidence/credibility can be achieved when a combination of methods is used.

3.2 Documentation of the decision process provides an auditable trail of all factors used in arriving at the choice of the qualification method(s), and the decision as to the qualification of the existing data. The level of confidence in the existing data is commensurate with the intended use of the data. Attributes which are considered in the qualification process are:

- A. Qualifications of personnel or organizations generating the data are comparable to qualifications requirements-of personnel generating similar data under the LLNL-YMP QAPP.
- B. The technical adequacy of equipment and procedures used to collect and analyze the data.
- C. The extent to which the data demonstrate the properties of interest (e.g., physical, chemical, geologic, mechanical).
- D. The environmental conditions under which the data were obtained if germane to the quality of data.
- E. The quality and reliability of the measurement control program under which the data were generated.
- F. The extent to which conditions under which the data were generated may partially meet Subpart G.
- G. Prior uses of the data and associated verification processes.
- H. Prior peer or other professional reviews of the data and their results.
- I. Extent and reliability of the documentation associated with the data.
- J. Extent and quality of corroborating data or confirmatory testing results.
- K. The degree to which independent audits of the process that generated the data were conducted.
- L. The importance of the data to showing that the proposed repository design meets the performance objectives of 10 CFR 60, Subpart E.
- M. Replication of test results

Note: Additional guidance related to this subject can be found in NUREG-1298 "QUALIFICATION OF EXISTING DATA FOR HIGH-LEVEL NUCLEAR WASTE REPOSITORIES" (February, 1988).