

MAR 19 1991

Mr. Dwight E. Shelor, Acting Associate Director  
for Systems and Compliance  
Office of Civilian Radioactive Waste Management  
U. S. Department of Energy, RW 30  
Washington, D.C. 20585

Dear Mr. Shelor:

SUBJECT: REVIEW OF U. S. DEPARTMENT OF ENERGY (DOE) Q-LIST, QUALITY  
ACTIVITIES LIST AND PROJECT REQUIREMENTS LIST

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the following  
DOE documents forwarded with the Desell/Linehan letter dated October 31, 1990:

Yucca Mountain Project "Q-List," YMP/90-55, Rev. 0, July 24, 1990;

Yucca Mountain Project "Quality Activities List (QAL)," YMP/90-56,  
Rev. 0, July 24, 1990; and

Yucca Mountain Project "Project Requirements List (PRL)," YMP/90-57,  
Rev. 0, July 24, 1990.

The lists appear to be generally based on the Yucca Mountain Project Work  
Breakdown Structure (WBS) Dictionary, and present items at a level of detail  
commensurate with a preliminary stage of design. It is our understanding  
that selection of items for the Q-List and QAL was generally based on Direct  
Inclusion and Exemption, as described in the Introduction to the Q-List,  
rather than by detailed evaluation.

Based on our review, the NRC staff's comments are as follows.

It appears that the DOE has used a more conservative approach  
in the classification of items and activities on the Q-List and QAL  
than was used as input to its Site Characterization Plan (SCP).

For many activities in the QAL, the use of "N/A" following "SCP  
Reference" and "Related Q-List Item" may provide the wrong  
connotation for people using the QAL. It is the staff's understanding  
that "N/A" was used where there was not a specific SCP reference or  
Q-List item. In those cases where the activity is covered by a number of  
different references or items, the use of N/A would not apply. Accordingly,  
in those cases where possible multiple references or entries may exist, a  
statement more definitive than "N/A" is appropriate.

The submittal of these documents addresses Comment No. 126 (ref. NRC Staff Site  
Characterization Analysis of DOE's Site Characterization Plan (SCP) for the  
Yucca Mountain Site, Nevada, NUREG-1347, August 1989) relating to the incompleteness  
and lack of conservatism of the lists of items and activities covered by 10 CFR  
Part 60, Subpart G QA programs. The NRC staff views these documents as acceptable  
but preliminary, with the understanding that major changes will occur prior to

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any licensing submittal, as more information becomes available and the analyses become more complete. Further review, and possible acceptance, of these lists by the NRC staff will be undertaken when lists based on actual designs and detailed evaluations are submitted for our review.

If you have any questions, please contact James T. Conway of my staff on 301/FTS 492-0453.

Sincerely,

ORIGINAL SIGNED BY

*for* John J. Linehan, Acting Director  
Repository Licensing and Quality  
Assurance Project Directorate  
Division of High-Level Waste Management  
Office of Nuclear Material Safety  
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cc: R. Loux, State of Nevada  
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\* See previous concurrence

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