

DEC 16 1991

Mr. John P. Roberts, 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. Roberts:

SUBJECT: ACCEPTANCE OF RAYTHEON SERVICES NEVADA (RSN) QUALITY ASSURANCE  
PROGRAM DESCRIPTION (QAPD)

The U.S. Department of Energy (DOE) Office of Civilian Radioactive Waste Management transmitted a copy of the RSN QAPD to the U.S. Nuclear Regulatory Commission (NRC) in a letter from D. Shelor to J. Linehan dated August 1, 1991. In its letter, DOE stated that the RSN QAPD was formed by merging the applicable parts of the Holmes & Narver (H&N) and Fenix & Scisson of Nevada (FSN) Quality Assurance Program Plans which were previously accepted by the NRC (ref. J. Linehan to R. Stein Safety Evaluation letters for RSN and H&N dated October 24, 1989, and October 3, 1989, respectively). The NRC staff reviewed the RSN QAPD to assure the transition plan which merged the FSN and H&N QAPDs to the present RSN QAPD, did not downgrade any of the DOE commitments previously accepted by the NRC staff for the FSN and H&N QA programs.

As a result of the NRC staff review of the RSN QAPD, ten comments were generated, discussed, and transmitted to DOE and the State of Nevada via facsimile on October 22, 1991. The DOE and NRC staffs discussed the DOE responses to the NRC staff comments in a November 7, 1991 conference call. DOE formally presented their responses to the NRC staff at the November 14, 1991 NRC/DOE QA meeting in Rockville, Maryland. The responses were subsequently satisfactorily incorporated into the RSN QAPD and transmitted to the NRC staff in a letter from J. Roberts to J. Linehan dated November 26, 1991.

The NRC staff has reviewed the DOE responses and finds them acceptable. Based on the NRC staff review of the RSN QAPD, we find this document continues to meet the NRC conclusions documented in the Safety Evaluation letters as noted above. This document can serve as an adequate framework for RSN to develop specific policies, plans, and procedures to implement the RSN QA program.

Changes may be made to the RSN QAPD if they do not downgrade the program commitments that the NRC has already accepted. Changes that downgrade the program commitments should be submitted to the NRC for its review, evaluation, and acceptance. A copy of this letter should be included with each controlled

Mr. John P. Roberts

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copy of the RSN QAPD, Revision 0. One copy should be resubmitted to NRC. Should you have any questions concerning our review, please contact William Belke on FTS/(301) 492-0445.

Sincerely,

*for* *Joseph J. Holonich*

Joseph J. Holonich, Director  
Repository Licensing and Quality  
Assurance Project Directorate  
Division of High-Level Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Enclosure: As stated

- cc: R. Loux, State of Nevada
- C. Gertz, DOE/NV
- S. Bradhurst, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
- D. Weigel, GAO
- P. Niedzielski-Eichner, Nye County, NV
- C. Thistlethwaite, Inyo County, CA
- V. Poe, Mineral County, NV
- F. Sperry, White Pine County, NV

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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*SUSAN, THESE COMMENTS WERE NOT FORMALLY TRANSMITTED TO DOE, RATHER THEY WERE FAXED. PLEASE ENTER THE ATTACHED FAX COPY INTO THE DOCUMENT SYSTEM. THANKS Bill 1/6/92*

Mr. John P. Roberts

- 2 -

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*Newton K. Stabilem*

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Joseph J. Holonich, Director  
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(FAXED THIS TO DOE  
10/22/91)

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(W BELKE)

NRC REVIEW OF RAYTHEON SERVICES OF NEVADA (RSN) QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)

GENERAL COMMENT

1. It was the U.S. Nuclear Regulatory Commission (NRC) staff's understanding, through meetings and discussions with the U.S. Department of Energy (DOE), that the Transition Plan for the merger of the Holmes & Narver (H&N) and Fenix & Scisson of Nevada (FSN) Quality Assurance Program Plans (QAPP) would accomplish a consolidation process of the two QAPPs into the RSN QAPD with no reduction in commitments or level of detail previously accepted by the NRC staff. This appears not to have been the case as indicated by the NRC staff comments below.

Additionally, the reduction in the level of detail delineated in the previously accepted H&N and FSN QAPP's makes the RSN QAPD difficult and somewhat cumbersome to use if it is intended to be used as a "living" QA document. The user of the RSN QAPD must have in their presence, the RSN QAPD, NQA-1, (Quality Assurance Requirements for Nuclear Facilities), and the Quality Assurance Requirements Document (QARD), DOE/RW-0214. This involves a burden of purchasing copies of NQA-1 at substantial cost or, obtaining written permission from the publisher to copy NQA-1 since it is a copyrighted document. The use of the three documents also adds an additional possibility of overlooking certain QA requirements that may not be centrally located and readily accessible to the user. Consequently, the NRC staff finds the RSN QAPD extremely difficult to follow and use as opposed to using the H&N and FSN QAPPs. The NRC staff recommends that DOE consider incorporating and delineating all of the QA program requirements into a single QARD (or QAPP) so as to facilitate its use.

SPECIFIC COMMENTS

1. In various sections of the RSN QAPD, there are several ambiguous phrases such as, "are applicable", "as necessary", "as appropriate", "where required" etc. These ambiguous phrases were not included as part of the H&N and FSN QAPPs previously accepted by NRC. The ambiguous phrases are listed below by the RSN page and paragraph number. These terms should either be deleted or clarified to explain their intent.

<u>RSN QAPD PAGE No.</u>	<u>PARAGRAPH</u>	<u>PHRASE</u>
2-1	2.0	are applicable
2-1	2.2.2	as necessary
2-2	2.2.3	the applicable
2-2	2.2.6	the applicable
4-1	4.0	the applicable
4-2	4.2.5	as appropriate
4-2	4.3.2 a.	applicable
5-1	5.1.1	as applicable
7-2	7.1 d.	as necessary
7-2	7.1 e.	as necessary
7-3	7.1 g.	as appropriate
7-4	7.2 e.	where required
7-4	7.2 h.	when required

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8-1	8.0	where appropriate
9-1	9.1.2.3	as appropriate
10-1	10.0	the applicable (twice)
17-1	17.1	as appropriate

2. NRC Review Plan (RP) Position 1.10 requests that organization charts clearly identify the organizational elements which function under the cognizance of the quality assurance (QA) program. RP position 1.12 requests that the QA responsibilities of these organizational elements be described. Paragraph 1.1.13 of the RSN QAPD lists three QA sections (QA Engineering, Quality Control, and Auditing) that assist the RSN Manager, QA (MQA/RSN). These organizational elements and reporting relationships should be identified on the RSN Project Organizational Chart (Figure 1-1) and, their QA responsibilities should be described in the RSN QAPD.
3. RP Position 2.11 requests that the QA organization, or other designated organizations knowledgeable in QA controls, review and document concurrence with procedures pertaining to safety functions. Paragraph III. C. of Section 2 in the H&N QAPP required the H&N implementing procedures to be reviewed and approved by the H&N Technical Project Officer (TPO) and Chief, Quality Assurance, to ensure they met the requirements of the H&N QAPP. Paragraph 1.1.3 of the RSN QAPD states that, "All technical procedures will be the responsibility of the TPO. Paragraph 1.1.12 f. of the RSN QAPD requires the MQA/RSN to review controlled documents for inclusion of QA requirements. Paragraph 6.1.1 a. of the RSN QAPD requires the QA organization to review and "where applicable", concur with controlled documents that contain or implement QA requirements. This\* appears to be somewhat of a reduction in the commitment previously accepted by the NRC staff or lack of specificity in the RSN QAPD. It is not clear in the RSN QAPD whether the TPO reviews and approves all of the technical procedures and likewise, whether the MQA/RSN reviews and concurs in all of the technical and QA procedures. Additional information should be provided in the RSN QAPD to clearly describe the organizational elements responsible to review and concur in the documents pertaining to safety functions.
4. RP Position 2.14 d. requests that appropriate management monitor the performance of individuals involved in activities affecting quality and determine the need for retraining and/or replacement. A system of annual appraisal and evaluation can satisfy this position. Section III.D.5 of the H&N QAPP, Section 2.5.1.5 of the FSN, and Section 2.1.9 (d) of DOE/0215 (Quality Assurance Program Description) required an annual evaluation to satisfy this RP Position. This RP Position and previous commitment does not appear to be addressed in the RSN QAPD. Additional information should be described in the RSN QAPD to address the above RP Position.
5. RP Position 9.2 requests that organizational responsibilities, including those of the QA organization, be described for the qualification of special processes, equipment, and personnel. The NRC staff also requested this information during its review of the H&N QAPP. The acceptable response from DOE was to identify the Nondestructive Testing (NDT) Section as the organization responsible for providing the NDT expertise (H&N QAPP Section 1, paragraph IV. C). The QA organization was identified as being responsible for reviewing and approving the special process procedures. This information appears to be missing from the RSN QAPD and should be

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described.

6. RP Position 10.5 requests that procedures include the identification of mandatory hold points beyond which work may not proceed until inspected by a designated inspector. Section 10, paragraph III. C in the H&N QAPP and Section 10.3 of the FSN QAPP specifically required the establishment of mandatory hold points. The RSN QAPD does not appear to specifically address this RP Position i.e., the Section 10.0 RSN QAPD commitment to meet the "applicable requirements" of the DOE Quality Assurance Requirements Document (QARD) and "applicable portions" of ASME NQA-1 are less than the commitments originally accepted by the NRC staff. Paragraph 3 of NQA-1 Supplement 10S-1 does not specifically require inspection hold points but rather gives the option for hold points by stating, "If mandatory inspection hold points are required...". The NRC staff is aware that it accepted the commitment to NQA-1 Basic Requirement 10 and Supplement 10S-1 for its acceptance of the DOE QARD. This acceptance was based on the premise that the DOE Office of Civilian Radioactive Waste Management performs no inspection activities (as stated in Section 10 of the DOE/QAPD). The NRC staff position is that there should be provisions in the implementing procedures for the identification of inspection hold points for those program participants performing quality affecting inspection activities. This information is not described in the RSN QAPD and appears to be a reduction in the commitment previously accepted by the NRC staff for the H&N and FSN QAPPs.
7. RP Position 12.2 requests that QA and other organizations' responsibilities be described for establishing, implementing, and assuring effectiveness of the calibration program. This RP Position was previously addressed in Sections 12 and 18 of the H&N QAPP (Ref. DOE response to NRC Comment 17 in attachment to May 9-10, 1989 QA Meeting Minutes-Linehan to Stein letter dated August 4, 1989). This RP Position was also addressed in Section 12.1.3 of the FSN QAPP. This information does not appear to be addressed in the RSN QAPD as previously addressed in the H&N and FSN QAPPs.
8. RP Position 17.1 requests that the scope of the QA records program be described. This RP Position was previously addressed in Section 17 of the H&N QAPP and Section 17 and Appendix E of the FSN QAPP. Both sections of the H&N and FSN QAPPs provided a list of typical QA records that were to be retained in addition to a commitment that, "... all records, including superseded records, shall be retained as lifetime records and shall be retained for the life of the project". The NRC staff based its acceptance of this criterion on these commitments and DOE/RW-0194, "Records Management Policies and Requirements". The reference to DOE/RW-0194 has been deleted from the OCRWM QARD and still remains an open item for NRC acceptance of the OCRWM QARD. The RSN QAPD does not address this RP and it appears that this is a significant reduction in the commitments previously accepted by the NRC staff. Information should be provided in the RSN QAPD to address the above NRC RP Position.
9. RP Position 18.6 requests that a tracking system be established to help assure that all findings are appropriately addressed, prioritized, and trended. Section 18 III. F. 2. of the H&N QAPP addressed this RP Position. This RP Position appears to be missing in the RSN QAPD and should be addressed.