

NOV 21 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 THE U.S. DEPARTMENT OF ENERGY (DOE) QUALITY ASSURANCE  
REQUIREMENTS DOCUMENT (QARD) AND QUALITY ASSURANCE PROGRAM  
DESCRIPTION (QAPD)

The purpose of this letter is to provide you with the results of the U.S. Nuclear Regulatory Commission (NRC) staff review of the DOE responses to the NRC staff comments on the DOE QARD, DOE/RW-0214, Revision 4, and QAPD, DOE/RW-0215, Revision 3.

On October 4, 1990, DOE transmitted a revised QARD and a revised QAPD to the NRC staff for review and acceptance. The NRC conditionally accepted the QARD and QAPD subject to DOE's resolution of six open items as documented in the Safety Evaluation letter (ref. Linehan to Shelor letter dated December 3, 1990). In this letter, the NRC staff stated it did not review the QARD sections pertaining to transport of spent nuclear fuel and high-level nuclear waste and the monitored retrievable storage (MRS) system. As a result of a February 1, 1991, telephone request from DOE, the NRC staff provided comments on its review of the QARD and QAPD sections applicable to the MRS and transport of spent nuclear fuel and high-level nuclear waste (ref. J. Linehan to D. Shelor letter dated April 15, 1991). In Supplement 1 of the August 21, 1991, Shelor to Linehan letter, DOE provided responses to the six open items and comments on the transport of spent nuclear fuel and high-level nuclear waste and the MRS. The results of the NRC staff review of the DOE responses are noted below.

The NRC finds acceptable the DOE responses to the six open items, the three comments on transport of spent nuclear fuel and high-level nuclear waste, and the two comments on the MRS. However, Appendix C of the QAPD states, in part, "The purpose of this appendix will be to amplify the QAPD for the MRS facility activities...." At such time of amplification, this appendix should be reviewed by the NRC staff to assure it meets the regulations pertaining to the MRS. Consequently, additional questions may be forthcoming as a result of the NRC staff review of this amplified appendix for the MRS.

Based on the NRC staff review of the revised QARD and revised QAPD and DOE's responses, the staff finds these documents continue to meet the NRC staff conclusions as documented in the NRC Safety Evaluations from J. Linehan to R. Stein dated May 8, 1989, and December 30, 1989, respectively for the earlier QARD and earlier QAPD. These documents can serve as an adequate framework for DOE and its project participants to develop specific policies, plans, and procedures to implement their respective QA programs.

9111260236 911121  
PDR WASTE  
WM-11 PDR

102.7  
WM-11  
NHK 1/0

Changes may be made to the QARD or QAPD if they do not downgrade DOE commitments previously accepted by NRC. However, changes that downgrade the program commitments should be submitted to NRC for review and acceptance.

A copy of this letter should be included with each controlled copy of the QARD and QAPD. One copy should be resubmitted to NRC. Should you have any questions concerning our review, please contact William Belke on (301)/FTS 492-0445.

Sincerely,

(Original) Signed by 

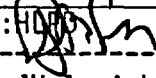
Joseph J. Holonich, Director  
Repository Licensing and Quality Assurance Project Directorate  
Division of High-Level Waste Management  
Office of Nuclear Material Safety and Safeguards

- 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

DISTRIBUTION

CNWRA	NMSS R/F	HLPD R/F	LSS
LPDR	ACNW	PDR	Central File
BJYoungblood, HLWM	JLinehan, HLWM	RBallard, HLGE	MFederline, HLHP
On-Site Reps	WBelke, HLPD	KHooks, HLPD	FSturz, IMSB
CMacDonald, SGTB	JSpraul, LPEB	JJankovich, SGTB	KLeu, IMSB

\* See previous concurrence

OFC :HLPD	:HLPD*	:SGTB*	:IMSB*	:HLPD 	:
NAME:WBelke/d	:KHooks	:CMacDonald	:FSturz	:JHolonich	:
Date:11/21/91	:11/13/91	:11/14/91	:11/14/91	:11/21/91	:

Changes may be made to the QARD or QAPD if they do not downgrade DOE commitments previously accepted by NRC. However, changes that downgrade the program commitments should be submitted to NRC for review and acceptance.

A copy of this letter should be included with each controlled copy of the QARD and QAPD. One copy should be resubmitted to NRC. Should you have any questions concerning our review, please contact William Belke on (301)/FTS 492-0445.

Sincerely,

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

- 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

DISTRIBUTION

CNWRA	NMSS R/F	HLPD R/F	LSS
LPDR	ACNW	PDR	Central File
BJYoungblood, HLWM	JLinehan, HLWM	RBallard, HLGE	MFederline, HLHP
On-Site Reps	WBelke, HLPD	KHooks, HLPD	FSturz, IMSB
CMacDonald, SGTB	JSpraul, LPEB	JJankovich, SGTB	KLeu, IMSB

---

OFC :HLPD *J* :HLPD *J* :SGTB *JPK* :IMSB :HLPD :  
 -----  
 NAME:WBelke/d :KHooks :CMacDonald :FSturz :JLinehan :  
 -----  
 Date:11/13/91 :11/13/91 :11/14/91 :11/14/91 :11/ /91 :