

FEB 27 1992

Dr. John Bartlett, Director
Office of Civilian Radioactive
Waste Management
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Dr. Bartlett:

SUBJECT: QUALITY ASSURANCE PROGRAM FOR MONITORED RETRIEVABLE STORAGE AND
TRANSPORTATION

The U.S. Nuclear Regulatory Commission (NRC) staff has been questioned by members of the Office of Civilian Radioactive Waste Management (OCRWM) of the U.S. Department of Energy (DOE) concerning the role of the NRC Division of High-Level Waste Management (HLWM) in coordinating quality assurance (QA) activities related to Monitored Retrievable Storage (MRS) and Transportation. HLWM is responsible for the review and evaluation of OCRWM activities related to site characterization of the mined geologic disposal system. The NRC Source Containment and Devices Branch in the Division of Industrial and Medical Nuclear Safety is responsible for MRS activities, and the Transportation Branch in the Division of Safeguards and Transportation is responsible for radioactive waste transportation activities. These NRC organizations have ongoing reviews of DOE-sponsored activities in their areas of responsibility.

As noted in the NRC letter from John Linehan to Dwight Shelor dated April 15, 1991, HLWM took the lead for the NRC in coordinating the review of the OCRWM Quality Assurance Requirements Document (QARD) and Quality Assurance Program Description (QAPD), which discuss in general terms the OCRWM QA program and how it will meet the requirements contained in Title 10 Code of Federal Regulations Part 50 (10 CFR Part 50) Appendix B. The NRC provided an integrated review and acceptance of the QARD and QAPD to OCRWM by John Linehan's letter to John Roberts dated November 21, 1991. The NRC staff does not believe that this coordination and integration role for HLWM is appropriate or necessary for review and evaluation of the implementation of activities which are specific to MRS and Transportation.

It is the NRC staff position that the cognizant NRC Division must be the contact for any NRC review or evaluation of OCRWM activities that is based mainly on implementation. This position applies to the acceptance of the OCRWM QA program (as opposed to the QARD and QAPD) for MRS and Transportation, as well as future questions concerning the implementation of MRS and Transportation activities. HLWM will, of course, keep the other NRC organizations informed about activities in its area of responsibility which also affect MRS and Transportation.

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If you have any questions concerning this letter, please contact me at (301) 504-3352/FTS 964-3352 or Joe Youngblood of my staff at (301) 504-3404 FTS 964-3404.

Sincerely,

(Signed) Robert M. Bernero

Robert M. Bernero, Director
Office of Nuclear Material Safety
and Safeguards

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