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M E M O R A N D U M

DATE: March 15, 1990

FOR: John J. Linehan, Director, HLPD, Division of High-Level  
Waste Management, M/S 4 H 3

FROM: *John W. Gilray*  
John W. Gilray, Sr. DR - YMP

SUBJECT: YMP Site Report for the month of February, 1990

The following report pertains to the QA, waste package and surface facility activities associated with the Yucca Mountain Project for the month of February, 1990.

QUALITY ASSURANCE

A. Activities to Upgrade YMP QA Program

The YMP managers and staff are continuing their efforts in developing new and improved hierarchy control documents which identify and trace flow down requirements from the regulations to output documents and designs. The Quality Assurance Requirements Document (QAR), Revision 3 which replaces NNWSI-88-9 and which will describe the overall generic QA program requirements applicable to DOE Hqts, Projects and participants has been developed and expected to be released in April.

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Since there are no deletions or dilutions to the previously NRC accepted 88-9 QA program controls the project believes this new QAR document does not need NRC review and acceptance prior to implementation. Also the project has developed a new QA Program Document (QAPD) which replaces the project QA Plans and Program Plans. The QAPD will represent the project QA implementing procedures and will take the place of Project 88-1 and DOE Hqts. QHPD. This new QAPD will require NRC review and acceptance.

#### B. YMP QA Organization

The recent consolidation of the YMP QA organization under the leadership of Don Horton appears to be increasing the effectiveness of QA program implementation as evidenced by (1) the improved morale, respect and interaction between the technical and QA staff within the project and between the project and the participants, (2) the high priority given to closing out the large back log of deficiency reports, (3) improving the consolidation and simplification of procedural controls (i.e., QA classification of items and activities, software QA program controls and study plans) and (4) the establishment of a QA Review Board, a trend analysis program and an independent allegation program. It is recognized however, that the overall assessment of these QA program improvements will be determined through future NRC observations of the projects' audits, surveillances, and reviews of completed work packages.

Don Horton, Project QA Director has posted two management positions for the QA Branch Chiefs for Programs and Verifications. These two positions are presently held by Nancy Voltura and Jim Blaylock respectively in an acting capacity until the permanent assignments are announced. Also Don Horton now officially reports to Dwight Shelor, Acting Director, Office of QA at DOE Hqts. At present it is uncertain as to what impact or influence DOE Hqts QA management might have on the project's goals and objectives for improving QA programs and their implementation.

The SAIC Technical and Management Support Services (T&MSS) who will continue to provide technical, management and QA support to the project is now considered a project participant. As a consequence they are developing their separate QA Program which will eventually be submitted to NRC for review and acceptance. SAIC has recently hired James Harper as QA manager for the SAIC T&MSS organization. James Harper was the QA manager for Florida Power and Light Co. at the St. Lucie Plant and has a sound QA background and experience in commercial nuclear industry. He should be able to provide significant QA input to the overall YMP QA program.

#### C. USGS QA Organization

While observing the QA surveillance at USGS it was learned that USGS has recently appointed a QA Manager for the USGS YMP activities. I understand the individual appointed has no previous QA background or experience. Due to the significant QA problems USGS has experienced in the recent past and the appointment of an inexperienced QA Manager, the effectiveness of the USGS QA organization to meet QA program requirements is questionable. The YMP and the NRC office will have to monitor the implementation of USGS' QA program closely to determine its acceptability.

#### D. Surveillances and Audits

♦ The YMP QA organization will be conducting a QA audit of the LANL QA Program the week of March 26 and a QA and technical surveillance of the preparation and review of Study Plans at USGS April 16. I intend to assist Jim Conway of NRC in the observation of this latter surveillance.

♦ The YMP QA organization conducted a QA surveillance of the USGS Software QA Program from February 20 to the 23rd. I assisted Tilak Verma of NRC in the observation of this

surveillance. The purpose of the surveillance was to assess the implementation of the USGS Software QA Plan SQAP-01 by reviewing software programs undergoing qualification reviews. The scope of the surveillance did not include a technical assessment of software qualification packages. This is expected to be performed in the future when more software qualification packages have advanced in the qualification process. Since technical subjective judgement will be involved in the technical qualification of some of these programs NRC may want to be involved in the technical assessment of these software programs at the next surveillance.

In summary the QA surveillance conducted the week of February 20 was meaningful and productive. The overall implementation of the software QA program was found acceptable recognizing the limited scope of this surveillance, i.e., that the technical adequacy of the software qualification packages was not part of the scope of this surveillance.

♦ A surveillance was conducted on the YMP audit and surveillance activities the week of February 26. No major deficiencies were identified.

#### E. QA Classification and Grading of Items and Activities

A YMP Quality Review Board (QRB) has been established to assure proper and effective management and implementation of the newly improved classification and grading program which are described in AP 6.17Q, "Determination of the Importances of Items and Activities", and AP 5.28Q, "QA Grading", and which satisfies NUREG 1318. This improved program does away with the three quality level system and establishes a review process to determine if an item or activity should or should not come under the YMP QA program controls. The QRB has successfully conducted a QA and technical evaluation of a work package using the two improved procedures and are now preparing training plans and

models to use in training the participants and YMP staff in the correct implementation of these two procedures. The QRB will continue to oversee the classification activities and participate in the final review of work packages relative to the QA classification and grading. It would seem very beneficial for NRC to review this overall effort when the new program has matured, which should be in June or July.

#### F. Status of Software QA Plan Development

- ◆ USGS Plan\* - Approved August 8, 1989
- ◆ LLNL Plan\* - Approved January 5, 1990
- ◆ FSN Plan\* - Approved December 20, 1989 + Software Configuration Management procedure FP-80-01
- ◆ SNL Plan - Incorporating review comments; approval expected by April, 1990
- ◆ LANL Plan - Consultant assisting in developing the plan; YMP expected to receive draft April 2, 1990
- ◆ H&N Plan - Draft received by YMP and rewrite is under way
- ◆ YMPD Plan - Project is incorporating QA review comments

Those software QA plans marked with an asterisk (\*) are enclosed for information and possible NRC review and comments. Since the software QA program will play a very important part in developing and verifying technical data used to support licensing information it may be appropriate for NRC to do an indepth review of the overall software QA program including the individual software QA program procedures. An informal interchange meeting between NRC and the YMP may be worthwhile to enable parties to gain a clearer understanding of the controls applied to software programs and how these controls are to be implemented.

#### G. Status of Don Brown's Actions Relative to Qualification of the H&N Personnel

- ◆ For background refer to item F in my last report dated February 15, 1990.

- ♦ The U. S. Labor Department has completed its investigation of whether Don Brown was inappropriately treated as a result of his audit finding concerning discrepant documentation pertaining to the qualification of H&N personnel. The Labor Department concluded that H&N did not unfairly treat Don Brown as a result of his audit findings. Don Brown has appealed this Labor Department decision and the case is presently going through appeals within the Labor Department.

#### WASTE PACKAGE

The LLNL February monthly status report is enclosed. It is encouraged that comments and/or questions regarding the contents of these reports be directed through this office for action and resolution in order to minimize the impact on the YMP.

The YMP Waste Package Plan previously discussed in my last monthly report has now been officially released and a copy is enclosed. LLNL is re-reviewing waste package Study Plans and Scientific Investigation Plans against the requirement of the Waste Package Plan and making the necessary revisions to comply with this plan.

There are no new issues that this office has identified that have not been brought to management's attention.

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Enclosures: USGS Software QA Plan for the YMP; Software QA Plan, LLNL; Software QA Plan, FSN; LLNL February monthly status report; YMP Waste Package Plan