

NOV 16 1990

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

Dear Mr. Shelor:

SUBJECT: SEPTEMBER 18, 1990 QUALITY ASSURANCE MEETING

The purpose of this letter is to transmit the enclosed minutes of the September 18, 1990, quality assurance (QA) meeting. The participants included individuals from the U.S. Nuclear Regulatory Commission (NRC), U.S. Department of Energy (DOE), State of Nevada, and Nye County, NV.

DOE discussed the results of the QA workshop held on August 7, 1990 in Denver, Colorado. Four basic problems that geotechnical personnel were experiencing in the implementation of QA requirements were identified. DOE plans to resolve these problem areas in future informal QA workshops and meetings with the scientists.

It was noted that DOE's "System 80" to resolve the Privacy Act issue should be in operation by the middle of October 1990. The status of upcoming audits and surveillances including the audit of Office of Civilian Radioactive Waste Management (OCRWM) and Yucca Mountain Project Office (YMPO) scheduled for October 15-26, 1990 were discussed. In addition, the activities completed and the bases for the acceptance of the participant's QA programs were identified by DOE.

Observations of DOE's June 1990 surveillance of YMPO, July 1990 audits of U.S. Geological Survey and Holmes and Narver, and August 1990 surveillance of

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WM-11

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WM-11
NH16

Mr. Dwight Shelor

Lawrence Livermore National Laboratory; and QA open items were discussed by the NRC staff.

If you have any questions regarding this letter or the enclosed meeting minutes, please contact Ken Hooks of my staff at 301/FTS 492-0447.

Sincerely,

151 by J. Holovich

JL

John J. Linehan, 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

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OFC :HLPD	:HLPD	:HLPD	:	:	:	:
NAME: J. Conway/bl	:KHooks	:J. Linehan	:	:	:	:
DATE: 11/11/90	:11/16/90	:11/16/90	:	:	:	:

MINUTES OF THE 9/18/90 QUALITY ASSURANCE MEETING

A meeting of the staff of the United States Nuclear Regulatory Commission (NRC) and representatives of the United States Department of Energy (DOE) to discuss issues of mutual interest with regard to quality assurance (QA) was held on September 18, 1990 in Bethesda, MD. Representatives of the State of Nevada (NV) and Affected Units of Local Government were notified of the meeting, but only a representative from Nye County was present. An attendance list is included (see Attachment 1).

The first agenda topic included a discussion by the DOE on the results of the QA workshop meeting held on August 7, 1990, in Denver, Colorado. DOE felt the workshop was beneficial, and they identified four basic problems that geotechnical personnel were experiencing in the implementation of QA requirements. The four issues (see Attachment 2) pertained to: lack of flexibility in the application of the QA Program; computer software QA program problems; data handling and definition (it was noted that this is a project management and not a QA problem); and interparticipant/project communications.

DOE will establish an internal task group with a facilitator in early October to meet with a number of scientists from each of the participants to resolve the lack of flexibility in the QA program. A team from Los Alamos National Laboratory (LANL) will take the lead on problems relating to the software QA program. The data turn-around time has been discussed with DOE project management who will be responsible for developing a realistic time interval. The lack of communication between QA and technical personnel was discussed at a recent TPO meeting, and it is planned to have the participant QA Managers attend the future TPO meetings. Presently, DOE is not planning on having any formal QA workshop meetings on this topic.

The next topic discussed was the status of the resolution of the Privacy Act issue of availability of DOE program participant qualification and training records for review during QA audits/surveillances. Depending on the resolution of the comments from the general public, DOE's "System 80" to resolve this problem should be operational by the middle of October 1990.

The status of upcoming audits and surveillances (see Attachments 3 and 4) was provided by DOE. NRC staff noted that the October 22-26, 1990 surveillance of the YMPO/T&MSS was scheduled during the period (last three weeks in October 1990) of the combined audit of DOE/HQ and YMPO. The audit of DOE/HQ and YMPO will be an overall review of the management controls and procedures in place to

implement the QA requirements documented in the Quality Assurance Program Description (QAPD). The two technical areas that will be covered include Midway Valley Trenching and Calcite-Silica Vein Deposits. The audit team will be made up of personnel from DOE/HQ and YMPO, Mactec, Weston, SAIC, and the United States Geological Survey (USGS). It was noted that there will be separate readiness reviews of the two technical areas prior to initiating work in these areas upon receipt of the environmental permits from Nevada.

The NRC staff discussed its recent observations of DOE audits and surveillances (see Attachment 5) of the YMPO, USGS, Holmes and Narver (H&N) and Lawrence Livermore National Laboratory (LLNL). The staff determined that overall the audits and surveillances were useful and effective, and the respective QA programs in place were being properly and effectively implemented for those specific QA elements that were within the scope of the particular audit or surveillance.

DOE presented a summary of activities related to the acceptance of the YMP participant's QA programs (see Attachment 6). DOE correspondence dated September 12, 1990, to the NRC identified their basis for acceptance of the participant's (excluding LANL) QA programs. As of the meeting, the NRC staff had not received these letters. It was noted that a recurring problem exists regarding the time interval for mail delivery between DOE/HQ and the NRC. The priority for NRC evaluation of the DOE documents was stated by DOE to be Sandia National Laboratory, USGS, REECo, Fenix & Scisson of Nevada, LLNL, and H&N.

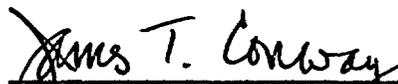
The NRC staff presented the status of the QA open items (see Attachment 7). With regards to the "ESF Q-List and QA Measures", DOE will send an uncontrolled copy of their Q-list and Quality Activities List in early November 1990 for NRC staff review. DOE will also send an uncontrolled copy of the final procedures for NRC review to close out the "Qualification of Existing Data" item. It is hoped that three to four of the current seven open items can be closed in the near future.

In closing remarks, DOE indicated that the NRC would not be in the formal review cycle for the QAPDs of the major participants in the Waste Vitrification Program (WVP). The Office of Civilian Radioactive Waste Management (OCRWM) will review and approve the QAPD for the Project Vitrification Branch of the Office of Environmental Restoration and Waste Management (DOE/EM). Project DOE/EM will be responsible for the review and approval of the QAPDs for the DOE offices and major contractor participants in the WVP. Copies of the QAPDs will be sent to the NRC, and the staff will be given the opportunity to accompany OCRWM on audits/surveillances of the participant's QA programs similar to the activities currently ongoing in the repository program.

The representative from Nye County was concerned with the status of the air and radiological monitoring programs conducted by SAIC. These issues were raised during the discussion of Trending Program for YMPO at the July 19, 1990 QA meeting. DOE indicated that these two areas would be covered in the the SAIC audit scheduled for the week of November 12, 1990.

DOE proposed the following agenda items be considered to be discussed for the next QA meeting tentatively scheduled for November 8, 1990 in Rockville, MD; Grading Process for items important to safety and engineered and natural barriers important to waste isolation; Software QA; QA Records; Procedure AP-1.10 Q relating to review of study plans; and Management Plan Strategy and Implementation.

The NRC staff requested a formal letter from DOE documenting the fact that the audit of REECo was cancelled due to lack of work activity.


James T. Conway
Senior QA Engineer
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste
Management
Office of Nuclear Material
Safety and Safeguards
U.S. Nuclear Regulatory Commission


Corinne Macaluso
Licensing Branch
Office of Civilian Radioactive
Waste Management
U.S. Department of Energy

NRC/DOE QA MEETING

<u>NAME:</u>	<u>ORGANIZATION</u>	<u>PHONE</u>
Jim Conway	NRC	492-0453
Ken Hooks	NRC	492-0447
Bill Belke	NRC	492-0445
John Buckley	NRC	492-0513
Ram Lahoti	DOE	586-7220
Donald G. Horton	DOE	544-7504
Arthur W. Spooner	WESTON	(202)646-6668
Tom Colandrea	EEI-UWASTE	(619)487-7510
Ram Murthy	DOE	(702)794-7968
Tilak R. Verma	NRC	492-3465
Thomas S. Gutmann	DOE/EM-343	427-1605
Larry D. Vaughan	DOE/EM-30	353-3137
P. Niedzielski-Eichner	NYE COUNTY, NV.	(703)818-2434
John E. Hennessey	DOE/EM-343	427-1602
Sharon Dyer	GAO	(202)586-8722
Corinne Macaluso	DOE/RW-331	586-2837

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Lack of flexibility in the application of the QA Program during scientific research, acceptability of peer review, application of dual research, required restrictive predictions without consideration for unknowns, further definition of requirements, and procedures commensurate with acceptable (good) scientific practices.

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Computer Software QA program (too complex, does not allow freedom to develop conceptual/prototype design/analysis) is based upon obsolete model concepts, not updated to present state-of-the-art, excessive documentation during development, lack of flexibility/lengthy change process, and needs in-depth review.

Data - Its definition, what form, when it is complete and, most importantly, time limitation for transfer to the appropriate participants data archive within 45 days of completion of data acquisition or development.

NOTE: This is not considered a QA problem per se, rather a management (project) problem.

Communication -

**It was apparent that interparticipant/
project communications are limited and
need improvement.**

FY-90 AUDIT SCHEDULE

AUDIT#/ORG./ATL	FEB			MAR			APR			MAY			JUN			JUL												
	5	12	19	26	5	12	19	26	2	9	16	23	30	7	14	21	28	4	11	18	25	2	9	16	23	30		
00-1 LANL								■ ▼ ●																				
S.DANA																												
00-2 LLNL														■ ▼ ●														
J.HEANEY																												
00-3 USGS																		■ ▼ ●										
R.MAUDLIN																												
00-6 HAN															□				▽		○			■				
F.KRATZINGER																												
00-6 REEOO																		CANCELLED DUE TO NO WORK ACTIVITY										
R.KLEMENS																												

TIERNEY

• ALL APPLICABLE 18 CRITERIA PLUS IMPLEMENTING PROCEDURES
REV 6

DATE:
7-26-90

- SCOPING VISIT
- ▽ TRANSMIT NOTIFICATION LETTER/PLAN
- TRANSMIT AUDIT MANUALS
- PERFORM AUDIT
- ▼ TRANSMIT GDRS
- TRANSMIT AUDIT REPORT

APPROVAL:
BY J. BLAYLOCK

PAGE 1 OF 2

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ATTACHMENT 3

FY-90 AUDIT SCHEDULE

AUDIT#/ORG./ATL	JUN				JUL				AUG				SEP				OCT				NOV							
	4	11	18	25	2	9	16	23	30	6	13	20	27	3	10	17	24	1	8	15	22	29	5	12	19	26		
90-6 H&N F.KRATZINGER	<input type="checkbox"/>				▽	○	■	▽	●																			
90-6 REECO R.KLEMENS	CANCELLED DUE TO NO WORK ACTIVITY																											
90-4 ONL S.DANA			<input type="checkbox"/>				▽	○	■	▽	●																	
90-7 FSN F.KRATZINGER								<input type="checkbox"/>		▽	○	■	▽	●														
90-8 SAIC R.MAUDLIN														<input type="checkbox"/>				▽	○	■	▽	●						
90-1-2 DOE S. DANA	COMBINED AUDIT OF HQ & YMPO																											

• ALL APPLICABLE 18 CRITERIA
PLUS IMPLEMENTING PROCEDURES
REV 8

DATE:
7-26-90

- SCOPING VISIT
- PERFORM AUDIT
- ▽ TRANSMIT NOTIFICATION LETTER/PLAN
- ▽ TRANSMIT SDRS
- TRANSMIT AUDIT MANUALS
- TRANSMIT AUDIT REPORT

APPROVAL:
By J. BLAYLOCK

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REPT	ACTIVITY DESCRIPTION	EARLY START	EARLY FINISH	1990																
				AUG				SEP				OCT				NOV				
				6	13	20	27	3	10	17	24	1	8	15	22	29	5	12	19	26
FENIX SCISSION NEVADA																				
	SOFTWARE CONTROL	31AUG90	30AUG90	NOTE 1.																
	TITLE I & II DOCUMENTATION	31AUG90	30AUG90	NOTE 1.																
HOLMES AND HARVER																				
	SOFTWARE CONTROL	31AUG90	30AUG90	NOTE 1.																
LOS ALAMOS NATIONAL LABORATORY																				
	SOFTWARE/CRITERIA 16, 17, 18.	31AUG90	30AUG90	NOTE 1.																
	CRITERIA 7, 12, 15, 16	90CT90	150CT90																	
LAWRENCE LIVERMORE NATIONAL LABORATORY																				
90-035	CRITERIA 2, 5, 6, 16, 17.	6AUG90A	10AUG90A																	
	CRITERIA 10, 11, 13, 15	13NOV90	16NOV90																	
REYNOLDS ELECTRICAL AND ENGINEERING																				
	CALIBRATION	31AUG90	30AUG90	NOTE 1.																
SAIC																				
90-036	CRITERIA 4, 7, 15, 17	27AUG90A	31AUG90A																	
SANDIA NATIONAL LABORATORY																				
	ESF ALT STUDY PLAN	4SEP90	7SEP90																	
	CRITERIA 2, 4, 7, 15, 17	26NOV90	30NOV90	NOTE 3.																
PROJECT OFFICE/T&MSS																				
90-037	CRITERIA 1, 2, 5, 6.	20AUG90A	24AUG90A																	
	EPA (RADIOLOGICAL MONITORING)	31AUG90	30AUG90	NOTE 1.																
	RECORDS MANAGEMENT	10SEP90	14SEP90	NOTE 2.																
	PRIORITIZATION OF SURFACE BASED TESTING	10CT90	50CT90																	
	CRITERIA 3, 4, 15, 18	22OCT90	26OCT90																	
U.S. GEOLOGICAL SURVEY																				
	CRITERIA 4, 12, 15, 16.	10SEP90	14SEP90																	
<p>1. POSTPONED UNTIL FURTHER NOTICE</p> <p>2. UNSCHEDULED SURVEILLANCE</p> <p>3. RESCHEDULED TO 1991 (AUDIT FOLLOW UP)</p>																				

Activity Bar/Early Dates
 Critical Activity
 Progress Bar

Primavera Systems, Inc. 888-888

DEPARTMENT OF ENERGY
YUCCA MOUNTAIN PROJECT OFFICE

FY-90 STATUS, REV 10, SURV SCH W/ORG
FY-91 STATUS, REV 1 SURV W/ORG

Sheet 1 of 1

[Signature]

9/5/90

Date Date: 31AUG90
Plot Date: 4SEP90

APPROVED BY:

DATE:

ATTACHMENT 4

NRC SURVEILLANCE OBSERVATION OF THE YUCCA MOUNTAIN PROJECT

QUALITY ASSURANCE PROGRAM FOR STUDY PLANS

From June 6-8, 1990, the U.S. Nuclear Regulatory Commission (NRC) staff observed the U.S. Department of Energy (DOE)/Yucca Mountain Project Office (YMPO) Surveillance No. YMP-SR-90-031 of the Yucca Mountain Project (YMP) Quality Assurance (QA) program conducted at Las Vegas, Nevada.

The NRC observers found the DOE/YMPO surveillance of the YMPO study plan preparation, review and approval processes useful and effective. The surveillance team was familiar with the requirements of the NNWSI/88-9 QA Plan and the applicable procedure (YMP AP-1.10 Q). Their checklist for this surveillance was well prepared and effectively utilized in determining the adequacy of QA controls under YMP AP-1.10 Q and assessing the status of completeness and procedural implementation for the preparation, review and approval of study plans. The team was thorough and professional in interviewing the YMPO technical and QA personnel and in conducting this surveillance.

The scope of this surveillance was limited to procedural implementation. No assessment of technical adequacy of any of the study plans was made during the surveillance. The team also did not evaluate the technical validity of any of the reviewers' comments on the study plans. The surveillance team identified some minor deficiencies in YMP AP-1.10 Q.

The NRC staff found the DOE/YMPO study plan review program adequate. The staff thought that the review suffers from a lack of detail in the implementing procedure and a lack of checking or in-process evaluation of the reviews. Although the review of the study plans required by the procedure had been performed, a fairly large number of minor, procedural problems were identified by the surveillance team. None of these problems if corrected in a timely manner, is considered serious enough to affect the adequacy of QA controls or their procedural implementation. The NRC staff agrees with the DOE/YMPO surveillance team's recommendation that the YMPO review process for study plans would benefit from internal surveillances of the in-process review activities.

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NRC OBSERVATION AUDIT OF U.S. GEOLOGICAL SURVEY

QUALITY ASSURANCE PROGRAM

The U.S. Nuclear Regulatory Commission (NRC) staff observed the U.S. Department of Energy (DOE)/Yucca Mountain Project Office (YMPO) Quality Assurance (QA) Audit No. 90-03 of the U.S. Geological Survey (USGS) conducted at Denver, Colorado, Las Vegas, Nevada, and the Nevada Test Site, on June 25-29, and July 2-3, 1990.

The NRC staff has determined that overall, DOE/YMPO QA Audit No. 90-03 of USGS was useful and effective. The audit was conducted in a professional manner, and the programmatic and technical portions of the audit were integrated to assess the adequacy and effectiveness of implementation of the USGS QA program. The audit team was well qualified in the QA and technical disciplines, and their assignments and checklist items were adequately described in the audit plan.

The NRC staff noted that certain changes in the technical scope of the audit were made by the DOE/YMPO audit team, but the NRC staff was not informed of these changes prior to the start of the audit on the morning of June 25, 1990. These changes in the technical scope of the audit affected the preparedness of certain NRC technical staff, and to some extent, adversely impacted their participation as observers on this audit.

In general, the NRC staff agrees with the DOE/YMPO audit team's preliminary findings that the USGS QA program has improved considerably since the last audit (August 1989), and has satisfactory procedure implementation, but still suffers from weaknesses in the area of records and effectiveness of training. The audit team recommended that USGS management attention is needed to correct these weaknesses. The audit team also recommended more effective use of USGS internal audits and surveillances. The NRC staff agrees with these recommendations. The restrictions due to the Privacy Act prevented the auditors from reviewing and obtaining any objective evidence of USGS QA and technical personnel qualifications and training.

The DOE needs to continue an aggressive schedule of audits and surveillances of the USGS QA program to ensure that future implementation is adequate. DOE must also have a more focused monitoring to ensure that all the corrective actions for the deficiencies identified from this audit are completed in a timely manner. The NRC staff expects to observe these audits and surveillances, and may perform its own independent audit at a later date to assess the adequacy and effectiveness of implementation of the USGS QA program.

(a) Observations

The NRC staff did not identify any observations relating to deficiencies in either the DOE/YMPO audit process or the USGS QA program.

(b) Weaknesses

- Due to the "Privacy Act," the audit team was not able to review the personnel files of the technical and QA personnel to verify they were trained and qualified to perform quality-affecting activities.
- It appears to the NRC observers that some of the conclusions in the draft management assessment are not supported by the results of this audit.
- The USGS internal audit 90-02, conducted January 8-22, 1990, identified similar discrepancies under programmatic elements 4, 7 and 12 that were identified during this audit. This indicates possible weaknesses in corrective actions.
- One audit team technical specialist did not seem to have reviewed the SIPs for one technical activity prior to the start of the audit.
- Technical procedures were not evaluated by the audit team for their adequacy for one of the technical activities reviewed during this audit.

(c) Good Practices

- The USGS has assigned personnel experienced in QA to various technical groups to assist in the implementation of the QA program.
- Programmatic and technical portions of the audit were well integrated.
- Software Configuration Management and implementing procedures are an excellent example of an effective implementation of the software QA program.

NRC OBSERVATION AUDIT OF HOLMES AND NARVER

QUALITY ASSURANCE PROGRAM

From July 31 through August 2, 1990, the U.S. Nuclear Regulatory Commission (NRC) staff participated as observers on the U.S. Department of Energy (DOE)/Yucca Mountain Project Office (YMPO) Quality Assurance (QA) Audit No. 90-06 of Holmes and Narver, Inc. (H&N) conducted at Las Vegas, Nevada.

The NRC staff has determined that overall, DOE/YMPO Audit No. 90-06 of H&N was useful and effective. The audit was limited in scope to programmatic elements, and did not include any technical work products. The audit team was well qualified and prepared in the QA area, and their assignments and checklist items were well described in the audit plan. The audit team performed a thorough audit of the H&N QA program adequacy and procedure implementation. The audit team determined that the H&N QA program was adequate and effective to the extent it has been procedurally implemented. The NRC staff agrees with the audit team evaluation.

NRC SURVEILLANCE OF THE LAWRENCE LIVERMORE NATIONAL LABORATORY

QUALITY ASSURANCE PROGRAM

From August 6-9, 1990, the U.S. Nuclear Regulatory Commission (NRC) staff observed the U.S. Department of Energy (DOE)/Yucca Mountain Project Office (YMPO) Quality Assurance (QA) Surveillance (No. YMP-SR-90-035) of the Lawrence Livermore National Laboratory (LLNL) Yucca Mountain Project (YMP) QA program conducted at Livermore, California.

The NRC staff found the DOE/YMPO surveillance of the LLNL QA program useful and effective. The surveillance team was familiar with the pertinent requirements set forth in LLNL QA program and implementing procedures. Their checklist for this surveillance was well prepared and utilized in determining the effectiveness of implementation. The scope of this surveillance was limited to QA procedural implementation and no assessment of technical adequacy was made during the surveillance.

The NRC staff agrees with the preliminary DOE/YMPO findings that LLNL has an adequate QA program in place which is being properly and effectively implemented for those specific QA elements that were within the scope of this surveillance.

SUMMARY OF ACTIVITIES RELATED TO THE ACCEPTANCE OF THE YUCCA MOUNTAIN PROJECT PARTICIPANTS QA PROGRAMS

ACCEPTANCE ACTIVITIES/BASES		PROJECT PARTICIPANTS ACCEPTED					
		FSN	H&N	LLNL	REEC _o	SNL	USGS
1	QA PROGRAM PLAN (QAPP) ACCEPTED BY NRC (SAFETY EVALUATION LTR.)	10/24/89	10/3/89	10/24/89	10/3/89	10/24/89	10/24/89
2	QA PROGRAM QUALIFICATION AUDIT COMPLETED	89-01 (4/14/90)	89-02 (4/28/89)	89-06 (6/9/89)	89-05 (9/5/89)	89-03 (9/12/89)	89-04 (8/23/89)
3	PROJECT OFFICE QA REVIEW OF OPEN QA PROGRAM DEFICIENCIES	NO SIG. DEFIC.	NO SIG.. DEFIC.	NO SIG. DEFIC.	NO SIG. DEFIC.	*TWO SEVER. LEVEL I SDR	*ONE SEVER. LEVEL I SDR
4	QA PROGRAM EFFECTED BY STOP WORK	NO	NO	NO	NO	NO	NO
5	PROJECT OFFICE QA SURVEILLANCE RESULTS SINCE QUALIFICATION AUDIT (see Item #2)	SATIS.	SATIS.	SATIS.	SATIS.	SATIS.	SATIS.
6	PROJECT OFFICE QA AUDIT RESULTS SINCE QUALIFICATION AUDIT (see Item #2)	SCHED. (9/24/90)	SATIS. (8/2/90)	SATIS. (5/18/90)	SCHED. (**)	SCHED. (8/27/90)	SATIS. (7/3/90)
7	PROJECT OFFICE ISSUES PARTICIPANT QA PROGRAM ACCEPTANCE LETTER	8/15/90	8/23/90	8/15/90	8/23/90	8/23/90	8/23/90
	a. EXCEPTIONS TO THE INITIATION OF NEW SITE CHARACTERIZATION ACTIVITIES	SEE NOTE 1&2	SEE NOTE 1&2	NONE	SEE NOTE 3	NONE	SEE NOTE 3

NOTES: 1. INCOMPLETE PROCUREMENT PROCEDURES
 2. SOFTWARE QA PROGRAM ACCEPTANCE BY PO QA
 3. PERSONNEL QUALIFICATION (PRIVACY ACT ISSUES)

* EVALUATED TO HAVE NO SIGNIFICANT IMPACT ON THE OVERALL IMPLEMENTATION OF THE QA PROGRAM
 ** TO BE SCHEDULED WHEN THERE ARE INCREASED WORK ACTIVITIES

PARTQA9P.A478-12-90

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ATTACHMENT 6

STATUS OF NRC/DOE OPEN ITEMS-SEPTEMBER 18, 1990

ITEM	DESCRIPTION	STATUS	RECOMMENDATION FOR CLOSURE/REMARKS
1-90 (i) QA-F-1 (ii) QA-F-2 (iii) QA-F-3	DOE Waste Glass QA Program	Open	<p>NRC staff has received Rev. 3 of the QARD which addresses the staff's comments on OGR B-14.</p> <p>The DOE responses have been evaluated and found acceptable by the NRC staff. DOE will be developing a draft position on OCRWM/NRC overview/verification activities. Development of a Memorandum of Understanding (MOU) among DOE-RW, NE, and NE is in question as the idea of an MOU has not been settled among the 3 DOE offices. At the 5/23/90 QA meeting, DOE stated that they intended to meet (Duffy/Shelor) to determine if an MOU is required.</p>
2-90 NRC Items 9 & 11	ESF Q-List and QA Measures	Open	DOE should meet with NRC to discuss and resolve concerns related to Q-List for the ESF and ESF conceptual design.
3-90 NRC Item 7	NNWSI Core Handling Procedures	Open	<p>DOE submitted the Core Handling procedures to the NRC staff in a 8/11/89 transmittal (Gertz to Stein). The issues raised in the YMP Surveillance Report (YMP-SR-89-134) will need to be resolved before this item can be closed. NRC will determine acceptability of implementation and adequacy of procedures when they are issued in final form and subsequently implemented.</p>

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<p>4-90 QA-A-1 QA-B-1d (1) QA-G-3 QA-G-4 QA-G-5</p>	<p>Qualified QA Program before start of new site characterization activities.</p>	<p>Open</p>	<p>DOE has made a committment to having a qualified QA program before the start of new site characterization activities. However, this item remains open up until the the NRC staff accepts the DOE QA program as qualified for the start of new site characterization activities.</p>
<p>5-90</p>	<p>Definitions for Conceptual, Title I, II, & III Design</p>	<p>Closed</p>	<p>(2/15/90 QA Mtg.)</p>
<p>6-90 NRC Item 13</p>	<p>Access to Project Participant's personnel files.</p>	<p>Open</p>	<p>DOE is working with General Counsel to initiate a mutually acceptable system. At the 5/23/90 QA meeting, DOE indicated the Federal Register Notice was at the DOE Secretary level. This would permit QA directors to maintain separate records on personnel qualifications and allow access to NRC, DOE, NV, and local governments. At the 7/19/90 QA meeting, DOE stated that an internal memo has been provided to the supervisors of personnel performing quality-affecting activities. This memo provides measures for maintaining personnel qualification records which will be available for verification. This action is due for completion by 8/31/90.</p>
<p>7-90 QA-E-1</p>	<p>Qualification of Existing Data</p>	<p>Open</p>	<p>DOE has provided NRC with a procedure for qualifying existing data. This procedure was reviewed by the NRC staff for consistency with NUREG-1298 and comments were given to DOE via a 1/90 telecon. The NRC staff is waiting for a DOE response before formally transmitting comments to DOE.</p>
<p>8-90</p>	<p>SCA comments</p>	<p>Open</p>	<p>DOE should provide a response to the 7/31/89 NRC SCA QA comments on the DOE SCP.</p>

9-90	DOE response (Stein to Youngblood dated 12/28/88) to 7 NRC concerns for DOE Audit 88-01 of PNL	Closed	DOE letter (Appel to Linehan dated 8/10/89) provided responses.
10-90 QA-G-1; a & d	Responses to NRC Observation Audits		DOE should respond within 30 days after NRC Observation Audit Report transmittal. The DOE responses are to be reviewed and considered by NRC staff in accepting DOE QA programs. DOE should respond to the following NRC staff Observation Audit Reports:
10.a	Holmes & Narver S89-1, 11/1-4/89	Closed	DOE letter (Appel to Linehan dated 6/13/89) provided responses.
10.b	Holmes & Narver 89-2, 4/24-28/89	Closed	(2/15/90 QA Mtg.)
10.c	Sandia Ntl. Lab. 89-3, 9/11-15/89	Closed	(2/15/90 QA Mtg.)