



Department of Energy
Washington, DC 20585

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Mr. Joseph J. Holonich, Director
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
Washington, DC 20555

Dear Mr. Holonich:

Enclosed for your information are responses to the U.S. Nuclear Regulatory Commission (NRC) comments on the Los Alamos National Laboratory Quality Assurance Program Plan, Revision 5. The NRC comments were provided in writing to the U.S. Department of Energy (DOE) at the April 30, 1992, NRC/DOE Quality Assurance Bimonthly Meeting. These responses are intended to provide additional clarification as requested by the NRC.

It is the determination of the DOE Yucca Mountain Quality Assurance Division that the transmittal of the enclosed responses will resolve all outstanding concerns.

Should you have any questions, please contact Sharon Skuchko of my office at (202) 586-4590.

Sincerely,

John P. Roberts
Acting Associate Director for
Systems and Compliance
Office of Civilian Radioactive
Waste Management

Enclosure:
Responses to NRC Concerns

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ADD: Ken Hooks

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cc w/Enclosure:

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RESPONSES TO THE U.S. NUCLEAR REGULATORY COMMISSION (NRC) CONCERNS

A. Comment - Revision 5, Section 3.0 of the Los Alamos National Laboratory (Los Alamos) Quality Assurance Program Plan (QAPP) deletes Quality Assurance (QA) levels 1, 2 and 3. However, Section 2.0, paragraph 2.1, and Appendices A and I, Revision 5, of the Los Alamos QAPP still contain reference to these QA levels without a description of what these QA levels consist of.

Resolution - At the time Revision 5 to the Los Alamos QAPP was evaluated, the Yucca Mountain Site Characterization Project QA Administrative Procedure (AP) 5.28Q, QA Grading, had been issued, Yucca Mountain Site Characterization Project Office (YMPO) and YMP participant training had been accomplished, and Los Alamos' procedures implementing the grading process had been issued and were being followed. The letter, Spence to Herbst, dated October 25, 1991, accepting Revision 5 to the Los Alamos' QAPP, stated: "It is noted that, although this revision deleted the Section 2 discussion of establishing QA levels, other sections continue to refer to these levels. However, those references are not expected to confuse or interfere with the application of the newer QA grading system, and their presence is believed not to compromise your QA program at present." As those references to QA levels in the QAPP were not affecting Los Alamos' QA program adversely and, in view of the anticipated early issuance of a further revision to the Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance Requirements Document (QARD), both Los Alamos and the Yucca Mountain Quality Assurance Division (YMQAD) felt that commitment of the resources necessary for immediate rework of those references was not warranted.

B. Comment - The NRC based its Safety Evaluation (SE) on Revision 4.4 of the Los Alamos, QAPP, dated October 2, 1989. Section 1.2 in Revision 4.4 of the Los Alamos QAPP adequately described the provisions to meet the guidance of Criterion 1.12 in the NRC staff Review Plan (RP) for the High-Level Waste Repository QA Program Descriptions. This guidance pertains to persons and organizations performing QA functions to have the ability to identify quality problems, initiate, recommend or provide solutions through designated channels, verify implementation of solutions and, most importantly, identify the persons or organizations with stop work authority. This description appears to be missing from Revision 5 of the Los Alamos QAPP.

Resolution - Los Alamos QAPP Revision 5 (Figure 1-1), reflected an organizational change that YMQAD had strongly recommended to improve QA independence and authority. In the earlier organizational scheme, the QA liaison personnel had reported administratively to Los Alamos' various project leaders. In the new organizational scheme, QA liaison personnel were reassigned to report directly to the QA project leader. The change removed: (a) the possibility that work assigned by Technical Project Leaders would compromise or interfere with QA responsibilities of the QA liaison personnel, and (b) the risk that QA judgments of QA liaison personnel might be compromised by the fact that their performance was evaluated by their technical supervisors rather than by the QA project leader. It was felt that the organization chart of Figure 1-1 demonstrated the required QA independence and authority.

Enclosure

The stop work process is mentioned in paragraphs 16.2 and 16.3 of Revision 5, and detailed methodology is provided in Los Alamos YMP-QA-01.2, Revision 1, Stop Work Control.

C. Comment - Section 1.2.1.1 in Revision 4.4 of the Los Alamos QAPP specifically assigned the QA project leader the responsibility and authority to direct and manage the Los Alamos YMP QA program. The description in Section 1.2.1.1 adequately met the guidance of Criterion 1.15 in the NRC RP. This description appears to be missing from Revision 5 of the Los Alamos QAPP.

Resolution - In the new organizational scheme QA liaison personnel were reassigned to report directly to the QA project leader. The change removed: (a) the possibility that work assigned by Technical Project Leaders would compromise or interfere with QA responsibilities of the QA liaison personnel and (b) the risk that QA judgments of QA liaison personnel might be compromised by the fact that their performance was evaluated by their technical supervisors rather than by the QA project leader. It was felt that the organization chart of Figure 1-1 demonstrated the required QA independence and authority.

D. Comment - Page viii of Revision 5 in the Los Alamos QAPP lists several acronyms for organizational positions (e.g., PQM, QADD, QAO) within the Los Alamos organization. These positions do not appear to be described in the Los Alamos QAPP or listed on the revised organizational chart in Figure 1-1. Figure 1-1 also contains several blank boxes and appears to be incomplete. (NRC RP Criteria 1.2, 1.5, 1.10, and 1.12 request organizational responsibilities be clearly identified and described.)

Resolution - The positions for which acronyms are listed on page viii of Revision 5 to the Los Alamos QAPP are not limited to the Los Alamos YMP organization. The second paragraph of Subsection 1.3.5.1 identifies QADD as the YMP QA Division Director and QAO as the Quality Assurance Officer of the entire Los Alamos organization. The acronym PQM applied to the YMPO position that was replaced by that of the QADD in the OCRWM reorganization.

Some boxes on the organization chart contain three dots instead of titles. The chart uses generic position titles, and dots in a box indicate that one or more additional boxes would be shown to the right of the preceding labeled box if specific tasks were being identified. For example, each project (i.e., Yucca Mountain task area at Los Alamos) under the Technical Project Officer has a project leader, and the chart indicates that two or more such task areas may exist. Similarly, the chart indicates that more than one QA liaison person reports to the QA project leader.