



Department of Energy

Washington, DC 20585

JUL 27 1992

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 U.S. Geological Survey (USGS) Interim Change Notices (ICN) 3, 4, 6, and 7 to the USGS Quality Assurance Program Plan, 01, 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 Office of Quality Assurance of the DOE Office of Civilian Radioactive Waste Management 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

8 Enclosures:

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PDR WASTE
WM-11

PDR

ADD: Ken Hooks

Ltr. Encl.
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1. Responses to NRC Concerns
2. ICN No. 3
3. ICN No. 4
4. USGS ICN No. 5
5. USGS ICN No. 6
6. USGS ICN No. 7
7. USGS Letter dated May 1, 1992,
documenting changes to ICN No. 4
8. DOE Letter dated October 4, 1991 (Horton to Hayes)

cc w/Enclosures:

C. Gertz, YMPO
K. Hooks, NRC
R. Loux, State of Nevada
M. Baughman, Lincoln County, NV
J. Bingham, Clark County, NV
B. Raper, Nye County, NV
P. Niedzielski-Eichner, Nye County, NV
G. Derby, Lander County, NV
P. Goicoechea, Eureka, NV
C. Schank, Churchill County, NV
F. Mariani, White Pine County, NV
V. Poe, Mineral County, NV
E. Wright, Lincoln County, NV
J. Pitts, Lincoln County, NV
R. Williams, Lander County, NV
J. Hayes, Esmeralda County, NV
M. Hayes, Esmeralda County, NV
B. Mettam, Inyo County, CA

RESPONSES TO THE NUCLEAR REGULATORY COMMISSION (NRC) CONCERNS

A. Comment - The NRC staff was not able to identify the ICN 5 and 7 documentation, supposedly part of the enclosure to the January 2, 1992 letter.

Resolution - Enclosure 2, 3, 4, 5 and 6 provide clearly marked retransmittals of ICNs 3, 4, 5, 6 and 7.

B. Comment - ICN 3 deletes part of paragraph 18.1.2.2 and all of paragraph 18.1.2.3. These changes appear to downgrade the NRC staff position on external and joint audit schedules previously accepted by the NRC staff in its October 24, 1989, Safety Evaluation (SE) of the USGS QAPP. The NRC position for external audits is based on the guidance in NRC Regulatory Guide 1.28, Revision 3, Position 3. Also, these changes do not appear to meet the intent of Section 18.4 of the DOE QARD.

Resolution - Although this represents a reduction in the number of audits performed, the requirement as presented in ICN 3 is consistent with NQA-1 and Regulatory Guide 1.28.

C. Comment - ICN 4 replaces the wording in paragraphs 2.1.6; 2.2.1; 2.2.5.1; 3.1.1.1; and 3.1.2. It appears the use of "paragraph" is erroneous and should be replaced with "sentence".

Resolution - In accordance with USGS program, the minor editorial changes to ICN 4 to the YMP-USGS-QAPP-01, Revision 5 were documented (Enclosure 7). In accordance with USGS QMP-6.01, Revision 5, these changes are being tracked for appropriate inclusion in the next revision.

D. Comment - In the October 4, 1991 letter, D. Horton to L. Hayes, it is noted that an ICN has been reviewed and completed. The NRC staff is unable to determine which ICN is being referred to since the ICN number is not listed in the letter or is the referenced letter from Chaney to Horton enclosed. The letter also has a line drawn through, "Lawrence Livermore National Laboratory (LLNL)" and the acronym "USGS" inserted without the correctors initial or date. This appears contrary to Section 17.3.6 of the USGS QAPP, and paragraph 2.9 of Supplement 17S-1 of NQA-1 1989, which require corrections to include the date and identification of the person authorized to make such a correction. Two examples of this procedure being properly implemented are in the ICN attachments to the November 12, 1991 letter from R. Spence to L. Hayes.

Resolution - The October 4, 1991, letter from D. Horton to L. Hayes indicated the review of ICN 6 (Enclosure 5). Enclosure 8 provides a copy of the 10/4/91 letter as it has been corrected and placed in the records system. A clearly marked retransmittal of the ICN that was enclosed with the letter can be found in Enclosure 5.

E. Comment - Enclosed to the November 12, 1991 letter from R. Spence to L. Hayes are eight pages. The letter approved the attached changes but does not identify the appropriate ICN number nor does the attached eight pages.

Resolution - Enclosure 6 provides a clearly marked retransmittal of ICN 7 that was enclosed with the letter.

F. Comment - Section 17.4 of the NRC accepted USGS QAPP required records that have been lost, damaged, or no longer legible, to be replaced, restored, or substituted within 90 days of such determination. ICN 6, Section 17.6 no longer contains requirements for replacement of lost, damaged, or illegible records. NQA-12 1989, Supplement 17S-1, Section 4.3 requires measures to be taken for replacement, restoration, or substitution of lost or damaged records.

Resolution - These requirements are addressed in ICN 6, page 4 of 5.17.6 Records Storage, last line;; "Measures also shall be taken to provide for replacement, restoration, or substitution of lost or damaged records."