



Department of Energy
Washington, DC 20585

JUL 10 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:

The Yucca Mountain Quality Assurance Division (YMQAD) has completed its review of Quality Assurance Program Plan (QAPP) Change Notices (CNS) 92-03, 92-04, and 92-05 to the Reynolds Electrical & Engineering Company, Inc. (REECo) QAPP, 568-DOC-115, Revision 8. These CNS are forwarded to the U.S. Nuclear Regulatory Commission (NRC) for its information (reference enclosures 2, 3, and 4).

CNS 92-03, 92-04, and 92-05 are accepted based on the YMQAD determination that the changes delineated are consistent with the requirements stated in the Office of Civilian Radioactive Waste Management Quality Assurance Requirements Document, Revision 4, and do not represent a degradation of quality assurance requirements.

CN 92-03 represents a clarification of the program commitments based on the Yucca Mountain Site Characterization Project Las Vegas Local Records Centers Consolidation Plan, Revision 0, dated February 1992; CN 92-04 cancels and supersedes previously approved CN 91-01, and CN 92-05 represents a clarification of program commitments and organizational structure.

In addition, enclosed are the DOE responses to the NRC comments (reference enclosure 1) on REECo CNS 91-01, 92-01, and 92-02. The NRC comments were provided to the U.S. Department of Energy (DOE) at the April 30, 1992, NRC/DOE QA Bimonthly Meeting. It is the determination of YMQAD that the transmittal of the enclosed responses and CNS 92-03, 92-04, and 92-05 will resolve all outstanding concerns with CNS 91-01, 92-01, and 92-02 which were submitted to the NRC under separate cover.


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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

4 Enclosures:

1. Responses to NRC Concerns
2. QAPP CN 92-03
3. QAPP CN 92-04
4. QAPP CN 92-05

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 NRC COMMENTS

ENCLOSURE #1

a.

Comment - CN No. 91-01 references page I-1, paragraph sec 1.0, para. 3 two times. The staff is unable to determine whether this is a typographical error or whether another change is intended.

Resolution - QAPPCN 92-04 corrects this duplication

b.

Comment - CN No. 91-01 references page I-3, sec. 1.0, para. 9 & 10. The NRC staff is unable to locate the referenced changes and believes it should be Section 1.0, para. 1.4, paragraphs 9 & 10.

Resolution - QAPPCN 92-04 corrects this typographical error

c.

Comment - Page 2 of CN 91-01, requires all references to QP as it applies to Quality Procedures, to be deleted. The change further explains that REECO has and will continue to maintain a set of Quality Procedures and a listing thereof, and that they will be referred to as quality procedures. The NRC staff does not understand that if REECO still has and will continue to maintain a set of Quality Procedures, why delete a reference to these procedures?

Resolution - QAPPCN 92-04 clarifies this by providing the current title, i.e., (Management Control {MC} Procedures), for procedures previously referred to as QPs

d.

Comment - CN No. 92-01, page XV-4, paragraph 1.4.5, deletes the REECO QAPP requirement for Yucca Mountain Site Characterization Project Office (YMPO) approval of Nonconformance Reports. The CN now requires item deficiencies that are detected during site characterization, construction, operation, and testing of the project through the YMPO or the Yucca Mountain Site Office. The NRC staff is unclear as to the rationale for this change and who is responsible for dispositioning, corrective action, and accepting deficiencies that are reported.

Resolution - NWWSI 88/9, QA Plan, required Participant generated NCRs to be submitted to the Project Office for approval. The QARD does not have such a requirement, therefore, the commitment was deleted in the REECO QAPP. This paragraph has been revised to reflect current nonconformance requirements imposed on Participants performing field work via AP 5.27Q, Rev. 1, "Control of Nonconforming Items". AP 5.27Q delineates responsibilities relating to reporting, dispositioning, implementing approved dispositions, and accepting completed dispositions for item deficiencies identified in the field. No action taken.

Encl 1



RE -325477

Reynolds Electrical & Engineering Co., Inc.

Post Office Box 98521 • Las Vegas, NV 89193-8521

IN REPLY REFER TO:

580-01-310

WBS 1.2.9
QA

MAR 27 1992

Richard E. Spence, Director
Quality Assurance Division
Yucca Mountain Site Characterization
Project Office
U.S. Department of Energy
Post Office Box 98608
Las Vegas, NV 89193-8608

CHANGES/REVISIONS TO PARTICIPANT QUALITY ASSURANCE PROGRAM DESCRIPTIONS

In accordance with your requirements, Reynolds Electrical & Engineering Co., Inc. (REECo), is submitting for your approval the enclosed proposed changes to our Quality Assurance Program Plan, 568-DOC-115, Revision 8. These changes represent a clarification of our program commitments based on the Yucca Mountain Site Characterization Project Las Vegas Local Records Centers' Consolidation Plan, Revision 0, dated February 1992. Further, REECo considers that the changes are minor in nature and do not downgrade or compromise any previously accepted commitments.

Upon receipt of your approval, REECo will establish an effective date, date the change notice, and issue for implementation. Should you have any questions or require further information, please contact W. J. Glasser of my staff at 794-7562.

R. F. Pritchett

R. F. Pritchett, Manager
Yucca Mountain Project Division
YMP Technical Project Officer

RFP:WJG:as

Enclosure
Quality Assurance Program Plan
Change Notice QAPPCN-92-03
(1 page)

cy w/o encl.
Central Files THRU
Executive Office, M/S 555
W. J. White, DOE/NV, M/S 505
P. J. Wilson, REECo, M/S 408

Spence
Stetson
Johnson

- CC: _____
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REC'D. YMP
3/27/92

REECo
AN EG&G COMPANY

ENCLOSURE 2