



Department of Energy

Washington, DC 20585

NOV 26 1991

Mr. John J. Linehan, Acting 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. Linehan:

The U.S. Department of Energy (DOE) Yucca Mountain Quality Assurance Division (YMQAD) has reviewed and approved Change Notices A and B to the Raytheon Services Nevada (RSN) Quality Assurance Program Description (QAPD)-002, Revision 0.

These approvals are based upon the determination that the changes are consistent with the requirements of the Office of Civilian Radioactive Waste Management Quality Assurance Requirements Document (QARD), Revision 4 (DOE RW-0214), and do not represent a degradation of Quality Assurance (QA) requirements from the Holmes and Narver and Fenix and Scisson QA Program Plans which have been replaced by the RSN QAPD, Revision 0.

The YMQAD review of Change Notice B assures DOE that the NRC comments on the RSN QAPD, Revision 0, have been addressed satisfactorily. Those responses are identified in Enclosure 1 and are included in the Change Notices A and B to QAPD-002, Revision 0 (Enclosure 2).

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

2 Enclosures: *in RSN* IN JACKET 9112020121 911126

- 1. Responses to NRC Comments
- 2. Change Notices A and B to QAPD-002, Revision 0



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PDR WASTE
WM-11 PDR

cc w/Enclosures:

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Received with letter dtd 11/26/91

RESPONSES TO NRC COMMENTS ON
QAPD-002, REV. 0

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GENERAL COMMENT

1. RSN developed the QAPD based on the requirements of the OCRWM Quality Assurance Requirements Document DOE/RW-0214 and by following the format of the OCRWM Quality Assurance Program Description, DOE/RW-0215. It was not appropriate to merge the H&N and FSN QAPPs into the RSN QAPD since these were based on the requirements of NNWSI/88-9 which was superseded by DOE/RW-0214. Specific comments are addressed below.

RSN concurs with the development of a single QARD in lieu of having a QAPD for each participant and will comply with this when so directed by DOE.

SPECIFIC COMMENTS

1. The QAPD has been modified as follows:

<u>RSN QAPD</u> <u>Page Number</u>	<u>PARAGRAPH</u>	
2-1	2.0	Deleted "that are applicable to ..."
2-1	2.2.2	Clarified - see rewrite
2-2	2.2.3	Deleted "applicable"
2-2	2.2.6	Deleted "applicable"
4-1	4.0	Deleted "applicable"
4-2	4.2.5	Deleted "as appropriate"
4-2	4.3.2 a.	Deleted "applicable"
5-1	5.1.1	Deleted "(as applicable)"
7-2	7.1 d.	Deleted "as necessary"
7-2	7.1 e.	Deleted "as necessary"
7-3	7.1 g.	Deleted "as appropriate"

Rec'd. w/itr. dtd. 9/11/86
Accession No. 9112020119

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RSN QAPD
Page Number
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PARAGRAPH
(Continued)

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|------|---------|---|
| 7-4 | 7.2 e. | See rewrite - Clarified RSN's role as an A/E in the procurement processes. Per DOE Admin. Procedures, RSN is not necessarily the procuring organization and may not necessarily review and approve all supplier submittals. |
| 7-4 | 7.2 h. | See rewrite |
| 8-1 | 8.0 | Deleted, "where appropriate" |
| 9-1 | 9.1.2.3 | Deleted, "as appropriate" |
| 10-1 | 10.0 | Deleted "applicable" in first instance and deleted "the applicable portions of" in the second instance. |
| 17-1 | 17.1 | Deleted ", as appropriate," |
2. The responsibilities of the QA Sections (i.e., Quality Assurance Engineering, Quality Control, and Audits and Surveillance) are defined in Quality Assurance Procedure QAP-1.1(Y), "Organization." QAPD Section 1.1.4.1.1.1 (formerly Section 1.1.13) has been revised to indicate that the responsibilities are defined in implementing procedures. Figure 1-1 has been revised to show these sections reporting the Manager, QA, YMP.

3. Section 1.1.3 has been revised to indicate that all technical and quality assurance implementing procedures will be approved by the TPO and to indicate that the TPO is responsible for reviewing these procedures. Section 1.1.4.1.1 f. (formerly 1.1.12) has been revised to add that the MQA/YMP approves all Technical and Quality Assurance Implementing Procedures. Deleted "where applicable," from 6.1.1a.
4. Section 2.2.12.4 has been added to describe the requirements for annual evaluations.
5. The RSN QA Division provides Nondestructive Testing Services as matrix support. This has been added in Section 9.1.1. The requirement for the QA Organizations to review and approve special process procedures has been added to Section 9.1.3.
6. Added Sections 10.1 d. and 10.4 to describe requirements for hold points.
7. Added definition of the TPO's responsibilities in Section 12.0 and the Quality Assurance Organization's responsibilities in Section 12.2.
8. More detail has been added to Section 17.1 to define the scope of RSN Records System.

Appendix E of the FSN QAPP and Section 17 of the H&N QAPP include lists of "TYPICAL" QA Records. Neither QAPP indicated that these records were mandatory nor was there a commitment to maintain these. Those lists were included because the previous QA Requirements Document (NNWSI/88-9) had lists of typical QA Records. The current Quality Assurance Requirements Document DOE/RW-0214 does not include a list of typical records. Section 17.2 of RSN QAPD provides a definition of QA Records.

The requirements for maintaining superseded records has been added to Section 17.7.

9. Section 18.7, third paragraph has been modified to address this commitment.