



NUCLEAR WASTE REPOSITORY PROJECT OFFICE

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November 11, 1994

Joseph J. Holonich, Chief
High-Level Waste and Uranium Recovery Projects Branch
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, MD 20852-2738

Dear Mr. Holonich:

I am writing on behalf of Nye County in order to transmit four copies of our draft *Quality Assurance Manual* for you and your staff's review and informal comment.

As you know, the Nye County Nuclear Waste Repository Project Office (NWRPO) is undertaking an Independent Scientific Investigation Program which includes drilling and down-hole instrumentation of boreholes at Yucca Mountain. The purpose of this program is to collect verification data in order to assess the credibility of the datasets generated by the Department of Energy's Yucca Mountain Project (YMP). As part of this effort, we intend to develop an independent verification dataset related to Yucca Mountain pneumatic continuity.

The Nuclear Regulatory Commission (NRC) staff has previously committed to Nye County that it would be willing to review and informally comment on our Quality Assurance Program (QAP) in order that NWRPO can have reasonable assurance that data generated under its direction will have credibility with the NRC in future potential licensing proceedings.

NWRPO Quality Assurance Program Design

The design of Nye County's QAP reflects our position that, as a potential participant in the licensing proceedings, we will not be held to the same rigid standards as DOE has established for itself under *ANSI/ASME NQA-1*. For this reason, the NWRPO QA Manual is not organized according to the eighteen NQA-1 criteria, but instead seeks to implement the following logic:

- Work must be performed under management controlled and accountable conditions, by knowledgeable and trained personnel.
- The work must be planned, documents important to quality must be controlled, goods and services must be procured through formal procedures, and equipment must be appropriately calibrated.

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- Once underway, the work must be documented in sufficient detail that it could be replicated by another knowledgeable, but independent, party.
- For samples, chain-of-custody and effective protective storage must be demonstrable.
- Work should be technically reviewed, work-in-progress should be subject to surveillance, and quality assurance implementation should be formally audited.
- Records must be organized for ready retrieval and stored to protect against damage and destruction.

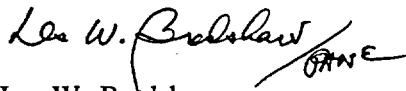
Timeliness of NRC's Review

Unfortunately, we must ask NRC staff for a more timely review than we had previously anticipated requesting. NWRPO's borehole and instrumentation effort has taken on an urgency because YMP has undertaken tunnel boring. We now believe it is essential to obtain pneumatic data that is not impacted by the tunnel boring machine progress and in order to take advantage of the changing barometric pressures that typically occur during the winter months. It is NWRPO's hope to begin drilling within the next four weeks. Any consideration that you can give to an informal review during this period would be greatly appreciated.

Please direct any questions you may have concerning the content of NWRPO's draft QA Manual to Phillip Niedzielski-Eichner at (703) 818-2434 or fax any comments to him at (703) 818-2437. Questions regarding the drilling and instrumentation program should be directed to me or Nick Stellavato, NWRPO's On-site Representative and the Principal Investigator for the drilling and instrumentation program.

Thank you for your consideration of our request to review and informally comment on NWRPO's draft Quality Assurance Plan.

Very truly yours,



Les W. Bradshaw
Project Manager

Enclosures (4)

cc (w/ copy): Daniel Dreyfus, OCRWM Director
William Bernard, NWTRB Executive Director
Carl Johnson, State of Nevada
William Offutt, County Manager
Stan Sims, Assistant Project Administrator
Nick Stellavato, On-site Representative
Phillip Niedzielski-Eichner, Governmental Dynamics, Inc.
Malachy Murphy, Lane Powell Spears Lubersky