



UNITED STATES
NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D.C. 20555-0001

May 24, 1995

Mr. Ronald A. Milner, Director
 Office of Program Management and Integration
 Office of Civilian Radioactive Waste Management
 U. S. Department of Energy
 1000 Independence Avenue, SW
 Washington, DC 20585

Dear Mr. Milner:

SUBJECT: OPEN ITEM REGARDING ELECTRONIC SCIENTIFIC NOTEBOOKS

The NRC staff has reviewed your letter dated May 2, 1995, and its enclosure on the subject above. The enclosure, a letter dated March 8, 1995, to the US Department of Energy from Lawrence Livermore National Laboratory (LLNL) addressed the subject, "Audit Observer Inquiry 0003 from Audit YMP-94-10." The enclosure included a copy of its controlling procedure (TIP-YM-12, "Electronic Record Keeping") which had been revised as a result of the subject open item. The LLNL letter described on-going activities that should reduce its reliance on procedural controls, and yet better control electronic scientific notebooks. We believe these activities should be carried to completion. In the interim, the staff has concluded that the information provided in your letter dated May 2, 1995, is acceptable to permit the closure of the open item. The item from the NRC's Open Item Tracking System is enclosed, showing that the item is no longer considered open.

A written response to this letter or the enclosed report is not required. If you have any questions, please call Jack Spraul of my staff on (301) 415-6715.

Sincerely,

John O. Howe for

Joseph J. Holonich, Chief
 High-Level Waste & Uranium Recovery
 Projects Branch
 Division of Waste Management
 Office of Nuclear Material Safety
 and Safeguards

Enclosure: As stated

cc: (next page)

9505310128 950524
 PDR WASTE
 WM-11 PDR

102.7
 WM-11
 NHC

Ronald A. Milner

- 2 -

CC List for letter dated May 24, 1995

- cc: R. Loux, State of Nevada
- J. Meder, Nevada Legislative Counsel Bureau
- W. Barnes, YMPO
- C. Einberg, DOE/Wash, DC
- M. Murphy, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
- D. Weigel, GAO
- P. Niedzielski-Eichner, Nye County, NV
- B. Mettam, Inyo County, CA
- V. Poe, Mineral County, NV
- W. Cameron, White Pine County, NV
- R. Williams, Lander County, NV
- L. Fiorenzi, Eureka County, NV
- J. Hoffman, Esmeralda County, NV
- C. Schank, Churchill County, NV
- L. Bradshaw, Nye County, NV
- W. Barnard, NWTRB
- R. Holden, NCAI
- A. Melendez, NIEC
- S. Brocoum, YMPO
- R. Arnold, Pahrump, NV
- R. Milner, DOE Wash., DC

DISTRIBUTION:	Central File	PUBLIC	ACNW	LSS
CNWRA	DWM r/f	HLUR r/f	JJSurmeier	JHAustin
MJBell	PPBrooks	JTBuckley	MSDeiligatti	On-Site Reps
BEMabrito	PALaPlante			

S:\DWM\HLUR\JGS\OpenItem.06

OFFICIAL RECORD COPY

* See previous concurrence

In small box on "OFC" line enter: C = Cover only, E = Cover & enclosure, N = No copy
 In small box on "DATE" line enter: M = E-mail distribution, H = Hard copy

OFC	HLUR*	E	HLUR*	HLUR*				
	JGSpraul:dh		JOThoma	JJHolonich				
DATE	05/23/95	H	05/24/95	05/24/95				

Delete file after distribution: Yes No

Ronald A. Milner

- 2 -

- cc: R. Loux, State of Nevada
- J. Meder, Nevada Legislative Counsel Bureau
- W. Barnes, YMPO
- C. Einberg, DOE/Washington, DC
- M. Murphy, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
- D. Weigel, GAO
- P. Niedzielski-Eichner, Nye County, NV
- B. Mettam, Inyo County, CA
- V. Poe, Mineral County, NV
- W. Cameron, White Pine County, NV
- R. Williams, Lander County, NV
- L. Fiorenzi, Eureka County, NV
- J. Hoffman, Esmeralda County, NV
- C. Schank, Churchill County, NV
- L. Bradshaw, Nye County, NV
- W. Barnard, NWRB
- R. Holden, NCAI
- A. Menendez, NIEC
- S. Brocum, YMPO
- R. Arnold, Pahrump, NV
- M. Stellavato, Nye County, NV

DISTRIBUTION: Central File PUBLIC ACNW LSS
 CNWRA DWM r/f HLUR r/f JJSurmeier JHAustin
 MJBell PPBrooks JTBuckley MSDeIligatti On-Site Reps
 BEMabrito PALaPlante

S:\DWM\HLUR\JGS\OpenItem.06

OFFICIAL RECORD COPY

In small box on "OFC" line enter: C = Cover only, E = Cover & enclosure, N = No copy
 In small box on "DATE" line enter: M = E-mail distribution, H = Hard copy

OFC	HLUR	E	HLUR	E	HLUR	E				
	JGSpraul:dh		JOThoma		JJHolonich					
DATE	05/23/95	H	05/24/95		05/24/95					

Delete file after distribution: Yes No

ENCLOSURE

OPEN ITEM STANDARD REPORT

OITSID: TBD

LAST UPDATE: TBD

STATUS: Closed

DATE RESOLVED: 24 May 1995

TOPIC OF THE OPEN ITEM/UNCERTAINTY: Controls specified for keeping scientific notebook type information on electronic media

RESPONSIBLE BRANCH/SECTION: HLUR/HLW & Quality Assurance Section

ACTION AGENCY: DOE

IDENTIFICATION DATE: 23 Sep 1994

SOURCE TYPE: Observation Audit Report

SOURCE DOCUMENT: NRC letter to DOE (Holonich to Milner) dated January 27, 1995, "OBSERVATION AUDIT OF LAWRENCE LIVERMORE NATIONAL LABORATORY"

DOE ACTIVITY CODE/WBS NUMBER: 1.2.11

UNCERTAINTY TYPE: Technical

SPECIFIC TECHNICAL TYPE: Concerns with DOE QA Program - Comment

TEXT: LLNL procedure TIP-YM-12, "Electronic Record Keeping," indicates that electronic records can be used instead of hard copy records generated in scientific notebooks. An "Audit Observer Inquiry" generated by the NRC questioned whether the controls in the procedure were specific enough and whether activities in accordance with the procedure could be audited. After some discussion, there was a commitment by LLNL management to respond, through the DOE, with an expanded response to the inquiry. The staff will carry this Audit Observer Inquiry as an Open Item until a satisfactory response is received through the DOE.

RATIONALE/BASIS: The thrust of the inquiry was to ascertain whether controls were in place to prevent changes of the text in electronic record keeping media just before the hard copy is printed and made a QA record for submittal to the local records center.

RECOMMENDATIONS: DOE should follow-up to ensure that LLNL adequately addresses the inquiry.

RATIONALE FOR UNCERTAINTY RESOLUTION METHOD SELECTION:

HISTORY:

September 23, 1994 - Item discussed with DOE/LLNL at exit meeting of NRC Observation Audit 94-12 (DOE Audit YMP-94-10)

January 27, 1995 - NRC letter to DOE (Holonich to Milner) "OBSERVATION AUDIT OF THE LAWRENCE LIVERMORE NATIONAL LABORATORY"

March 10, 1995 - A response to this open item was proposed by LLNL during NRC Observation Audit 95-05 (DOE Audit YM-ARC-95-05). The item remains open pending formal response from DOE.

May 2, 1995 - Letter from DOE to NRC (Milner to Holonich) includes information from LLNL to close this open item.

May 24, 1995 - Letter from NRC to DOE indicating acceptability of the information in DOE letter of May 2, 1995 and closure of this item.

CROSS REFERENCE

CITATION: §60.150, §60.151, and §60.152 (Subpart G. Quality Assurance)

LARP (REVIEW PLAN) NUMBER: 10

REFERENCES: None