

JUN 09 1992

Mr. John P. Roberts, Acting Associate Director
for Systems and Compliance
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Roberts:

SUBJECT: INQUIRY ON CORRECTED INFORMATION IN QUALITY ASSURANCE RECORDS

The purpose of this letter is to provide clarification from the Nuclear Regulatory Commission staff on a recent quality assurance (QA) interpretation made by the American Society of Mechanical Engineers (ASME) Committee on Nuclear Quality Assurance (NQA). The NRC staff clarification originates from the recently published Inquiry on page 97 of the January 1992, Mechanical Engineering (enclosed) pertaining to ASME NQA-1-1989, "Quality Assurance Program Requirements for Nuclear Facilities" (NQA-1), Supplement 17S-1, Paragraph 2.9; Corrected Information in Records.

The NRC staff believes that the above ASME interpretation may be misleading or possibly misused with respect to establishing and implementing the intent of the Title 10 Code of Federal Regulations Part 60, Subpart G QA program requirements for the high-level nuclear waste repository. NQA-1, Supplement 17S-1, Paragraph 2.9 (which the U.S. Department of Energy, Office of Civilian Radioactive Waste Management, QA Requirements Document commits to comply with), contains provisions to allow information to be corrected in QA records. However, Paragraph 2.9 of Supplement 17S-1 requires corrections to QA records to include the date and identification (i.e., initials) of the individual authorized to issue such a correction.

The January 1992, ASME published reply to the inquiry on NQA-1, Supplement 17S-1, Paragraph 2.9 does not require corrections to QA documents to be made until the document becomes a QA record, or until it is "authenticated." In the scientific development area of the high-level nuclear waste repository, QA documentation may take many forms, such as laboratory notebooks. Experiments associated with the documentation contained in scientific notebooks may sometimes continue over an extended time period of several years. During this extended time period, personnel may change job functions and no longer be associated with the particular project, or, be unavailable should questions arise on the accuracy of questionable crossed out data. The NRC recognizes that there may be isolated instances where crossed out entries may not be initialed and dated at the time of documenting the data. Such instances should be documented and corrected at the earliest time possible. However, it is the NRC staff position that all corrected information on QA document entries be accomplished as early as possible and not at the time of record authentication. The corrections should include the date and identification of the person authorized to issue such correction as required by NQA-1-1989, Supplement 17S-1, Paragraph 2.9.

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In addition to this letter, a letter will be sent by the NRC staff to the ASME NQA Committee Chairman requesting reconsideration of this interpretation.

Should you have any questions on this matter, please contact William Belke of my staff on (301) 504-2445.

Sincerely,

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Joseph J. Holonich, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure: As stated

- cc: R. Loux, State of Nevada
- C. Gertz, DOE/NV
- S. Bradhurst, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
- D. Weigel, GAO
- P. Niedzielski-Eichner, Nye County, NV
- C. Thistlethwaite, Inyo County, CA
- V. Poe, Mineral County, NV
- F. Sperry, White Pine County, NV
- R. Williams, Lander County, NV
- P. Goicoechea, Eureka County, NV
- L. Vaughan II, Esmeralda County, NV
- C. Shank, Churchill County, NV
- T. J. Hickey, Nevada Legislative Committee

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[Handwritten initials]

May 6-8, Nashville, Tenn.; Sept. 5-16, Dallas, Tex.
ASME staff contact: Calvin Gomez (212) 605-4788

Inquiries

ASME procedures provide for reconsideration of this interpretation when or if additional information is available, which the inquirer believes might affect the interpretation. Further, persons aggrieved by this interpretation may appeal to the cognizant ASME committee or subcommittee. As stated in the foreword of the code documents, ASME does not "approve," "certify," "rate," or "endorse" any item, construction, proprietary device, or activity.

Interpretations of the ASME Committee on Nuclear Quality Assurance:

ASME NQA-1-1989, Supplement 18S-1; Records, Audit Checklists

Inquiry: Does NQA-1 require that the completed checklists for an audit be retained as quality assurance records?

Reply: No. However, it should be noted that the records required for an audit are identified in Supplement 18S-1, Paragraph 8, and these records must meet the requirements of Supplement 17S-1, Paragraphs 2.7.1 or 2.7.2.

ASME NQA-1-1989, Supplement 6S-1, Paragraph 3; Document Changes

Inquiry: Do NQA-1-1989, Supplement 6S-1, Paragraphs 3.1 and 3.2 permit the omission of an organization's review and approval of a revision to a document originally reviewed and approved by that organization?

Reply: Yes, provided the conditions for such omission are clearly delineated in accordance with Supplement 6S-1, Paragraph 2(b).

ASME NQA-1-1989, Supplement 11S-2, Paragraph 2.2; In-Use Tests

Inquiry: ASME NQA-1-1989, Supplement 11S-2, Paragraph 2.2, requires test problems to permit confirmation of acceptable performance of the computer program in the operating system. Is it the intent of this paragraph that the term "operating system" include both the operating system software and hardware?

Reply: Yes.

Inquiry: ASME NQA-1-1989, Supplement 11S-2, Paragraph 2.2 requires that test problems be run whenever the computer program is installed on a different computer or where significant hardware or operating system configuration changes are made. Is it the intent of the last sentence in this paragraph to additionally require periodic testing of computer programs within the operating system?

Reply: Yes, for those applications where computer failure or drift can affect required performance. The term "drift" is intended to mean the accumulated effects of degradation of the computer system. "Computer failures" is intended to mean unidentified computer component

failures.

ASME NQA-1-1989, Supplement 17S-1, Paragraph 4.4.2; Quality Assurance Records, Fire Protection

Inquiry: Does NQA-1-1989, Supplement 17S-1, Paragraph 4.4.2 permit a 1-hr, fire-rated container to be used in a single-story trailer as an acceptable Alternate Single-Storage Facility, provided that a person who is competent in the technical field of fire protection and fire extinguishing has certified that the single-story trailer has less than 25 lb per sq ft of combustible material and will burn out completely in less than 1 hr when left unattended?

Reply: No. Paragraph 4.4.2 of Supplement 17S-1 requires 2-hr fire protection regardless of the weight per square foot of combustible material or time period of burnout.

ASME NQA-1-1989, Supplement 17S-1, Paragraph 2.9; Corrected Information in Records

Inquiry: Prior to authentication of a document as a QA record in accordance with NQA-1-1989, Supplement 17S-1, Paragraph 2.3, "Record Validation," is it required that corrections to the document be individually dated and the person making the correction be identified?

Reply: No. However, once the document becomes a record, the requirements of Supplement 17S-1, Paragraph 2.9 apply.

PTC 6.1-1984, Interim Test Code for an Alternative Procedure for Testing Steam Turbines

Inquiry: Paragraph 4.35 of PTC 6.1 recommends that the inspection hole should have an inside diameter of at least 4 in., and that this may preclude its use in pipes smaller than 8 in. in diameter. What is recommended for inspection ports on flow sections 6 in. and smaller to still meet the accuracy requirement of 0.25 percent? Can a small inspection port be used?

Reply: If the flow measuring piping is smaller than 8 in., the Code-recommended measurement of condensate flow may be used to determine final feedwater flow. The metering section and primary element, installed in this low-pressure location, could be flanged to ease inspection before and after a test.

An inspection port is recommended for use on a primary-flow measurement device that is welded in the feedwater line to facilitate an inspection of the device before and after a test. Measurement uncertainties of uninspected flow devices are too high for a Code test.

The minimum 4-in. diameter of the inspection port allows adequate access for the inspection device and will usually permit the verification of port and pressure tap-edge integrity by feel.

The port may also be used for cleaning devices or for repair of damage to the nozzle or to its throat taps. A smaller port makes inspection more difficult and increases the risk of damage during access.

Boiler and Pressure Vessel Code Cases

The Boiler and Pressure Vessel Committee meets regularly to consider proposed Code Cases to provide, when the need is urgent, rules for materials or construction not covered by existing Code rules. Those cases that have been adopted appear in one of the following Code Cases books: (1) *Boilers and Pressure Vessels* or (2) *Nuclear Components*. Revisions and additions to these cases appear in Supplements, which are issued as a result of action taken by the Boiler and Pressure Vessel Committee.

Proposed Revisions and Addenda to the Boiler and Pressure Vessel Code

As the need arises, the Boiler and Pressure Vessel Committee considers proposals to revise the Code. Those revisions that are approved by ASME are published in annual Addenda to the Code.

The Code Cases and Code revisions shown in this issue of *Mechanical Engineering* were considered at the Boiler and Pressure Vessel Committee meeting of Sept. 13, 1991. Comments addressing specific items, which are received by ASME on or before Feb. 25, 1992, will be referred to the appropriate committee for consideration.

SECTION I, POWER BOILERS

91-248—BC90-611, Case 2116, *Sole Use of Metric Units for Pressure Relief Device Nameplates; Sections I, IV, VIII Divisions 1 and 2 and Section X*
Adopt Case 2116*(1).

91-250—BC89-426, Table PG-23.1, *Applicability of Notes 12, 14, 17, and 18*
Revise the subject Table*(9).

91-251—BC90-617, A-361 *Review of ASTM Standard Test Methods*
Revise the subject Appendix*(1).

91-252—Cases 2033-1 *21Cr-11Ni-N Alloy*, and 2056 SA-333, *Gr. 6 Smls and Welded Steel Pipe*
Reaffirm the subject Cases*(2).

91-253—BC90-818 Table PG-23.1, *Stresses for Austenitic Castings*
Revise Table PG-23.1*(2).

*Copies of these Code Cases and/or revisions can be obtained from Silvana Rodriguez, Mgr. Administration, C.A.S. ASME Codes and Standards, M/S 39G, 345 E. 47th St., New York, NY 10017. Comments should be sent to M.A. Weinstein, Assistant Secretary-Boiler and Pressure Vessel Committee, M/S 8E, at the same address. Please reference the date of issue of *Mechanical Engineering*, item number (91-), and number of pages required (shown as a number in parentheses following the item). A remittance is required to cover handling and mailing costs as follows: 1-10 pp. \$5; 11-30 pp. \$9; 31-60 pp. \$20; 61-90 pp. \$30. Over 90 pp., take the amount from each appropriate category. Requests must be submitted in writing with the proper remittance. All orders must be prepaid.

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