



Curatorial Science Consultants

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November 12, 1998

William Belke
United States Nuclear Regulatory Commission
On-Site Representative
1551 Hillshire Drive
Las Vegas, Nevada 89134

Dear Bill,

Enclosed is a revised version of the NWRPO Quality Assurance Program Plan that has been modified based upon our discussion last week.

The changes were in relation to the four additional questions from the NRC resulting from our initial response to your review. I have also included a specific point-by-point response to the questions for your assistance in locating the modifications in the QAPP.

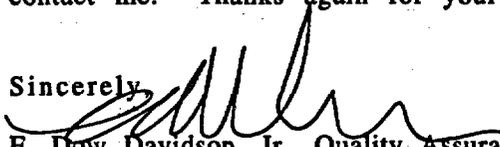
Also I want to take the opportunity to document the fact that NWRPO has addressed the observations and findings by Latif Hamdan in his "Technical Note Concerning Nye County's Borehole Data Acquisition and Management Program... September, 30 to October, 1, 1998."

In observation 2-a Hamdan asks that we include a provision to verify the performance of the borehole packers. We have included such a provision in the "Borehole Testing Work Plan for EWDP" which has just been issued as a controlled document.

Secondly in 2-b he states that we need to require any of our vendor laboratories that are to conduct analyses of gas and water be certified (e.g., by US EPA) and that the labs have their own QA programs. Although this is the system dictated by our current quality procedures we have also reiterated the requirement in our new EWDP "Sample Management" also a controlled QA document.

If I can answer any questions concerning these document please do not hesitate to contact me. Thanks again for your excellent help.

Sincerely,


E. Dow Davidson, Jr., Quality Assurance Officer

Attachments as noted

150003

cc: QARC-
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L. Bradshaw, Nye County
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NWRPO RESPONSES
TO
QUESTIONS FROM THE NRC RESULTING FROM DRAFT RESPONSES TO
FIRST SET OF NRC QUESTIONS

1. The Policy Statement and the remainder of the QAPP have been revised and now indicate the Program has been designed to meet the Basic Requirements of NQA-1-1986. NQA-1 is divided into sections namely, Basic Requirements, Supplementary Requirements, and Nonmandatory Appendices. Is it the intent to just meet the Basic Requirements (which essentially match App. B to 10 CFR 50) or the remainder of the NQA-1 Standard? This appears to be misleading.

Answer 1: We have made a clarification to the Policy Statement – it now states that our conformance to the NQA-1 standard includes:

" Basic Requirements, Supplementary Requirements, and Nonmandatory Requirements as applicable and as incorporated in NWRPO implementing procedures."

2. Question 2 was dropped from consideration by mutual agreement. The offending paragraph was joined to the previous one to ensure clear context (Pg. 13)
3. a Q#4 - NUREG-4640 Not mentioned. Why?
3. b Pg. 13 - NUREG-0856 - "Limited Basis." As in #1 above, need to clarify what is or is not applicable.
- 3.c Q#10 requests certified and controlled. Response on pg. 13 "appropriately used, documented and controlled." How does this meet the intent of the request?

Answers: 3.a. A simple oversight on the authors part- this has been rectified on pg. 12.

3.b Section has been modified as follows: (please see the footnote also)

" Software Quality Assurance (SQA) is applied as part of the Quality Assurance Program and is applicable exclusively to software¹ that generates quality affecting data, e.g., those with potential importance in Yucca Mountain-related suitability and licensing proceedings. Quality affecting software shall be

¹ This is exclusively Modeling software - computer codes that simulate environmental processes.

developed, controlled, and used in accordance with the SQA implementation procedures

SQA implementation procedures conform to the guidance of NUREG-0856, "Final Technical Position on Documentation of Computer Codes for High-Level Waste Isolation". NUREG/CR - 4640, Handbook of Software Quality Assurance Techniques Applicable to the Nuclear Industry may be consulted for guidance as appropriate".

3.c Section was modified - see Answer 3.b above.

4. Q#11 - NUREG-1298 - "Limited basis." Same rationale for #2 above.

Answer 4: We have modified the statement on page 13 as follows:

"NWRPO considers the controls of NUREG-1298, "Generic Technical Position of Qualification of Existing Data for High-Level Nuclear Waste Repositories" as not applicable. All data directly collected by NWRPO is gathered under our QA Program (NWRPO's) and is considered qualified. NWRPO does not intend to qualify data obtained from outside the controls of the NWRPO QA Program -however these "outside" data will be identified as not qualified under the NWRPO QA Program."

5. Q#13 - Response appears only to address "acceptance and rejection criteria." Does not appear to address or clarify remainder of question.

Answer 5: We have modified the statement on page 18 as follows:

"This section describes how applicable design bases, regulatory requirements, or other requirements necessary to assure adequate quality are suitable included or referenced in procurement documents. This section is designed to incorporate and conform to applicable portions of ANSI/ASME NQA-1, as well as criterion IV of 10CFR50, Appendix B.