

**Summary Highlights  
of  
NRC/DOE Management/Quality Assurance Meeting  
NRC T2B3, Rockville MD  
Hillshire Blue Room, Las Vegas NV  
DOE Headquarters, Room 7F091  
CNWRA, San Antonio TX  
August 11, 1999, 1:00 p.m. to 4:30 p.m. EDT**

The Management/Quality Assurance (QA) Meeting between the U.S. Department of Energy (DOE) and the U.S. Nuclear Regulatory Commission (NRC) included a brief discussion of the status of various programmatic issues, but was focussed primarily on the status of, and progress made in addressing concerns regarding implementation of DOE's QA program since the Management Meeting on April 22, 1999. This meeting summary includes a brief description of the presentations, the meeting agenda (attachment 1), the attendance list (attachment 2), and a copy of slides used at the meeting (attachment 3). The meeting was noticed on July 30, 1999.

**Management Issues Overview:** The NRC's Yucca Mountain Review Plan will describe how NRC will review a potential License Application (LA) against the requirements of 10 CFR Part 63. NRC stated that the plan will eventually contain suggested outlines for the postclosure and preclosure sections of the LA and that this guidance should eventually help facilitate and simplify the staff's review if DOE follows form and content of the review plan. NRC indicated that it is currently reviewing more than 1,000 comments on the proposed 10 CFR Part 63 submitted in writing and in public meetings. NRC discussed the Environmental Impact Statement (EIS) Review Plan, a draft of which is being used to guide both a completeness review and an evaluative review of DOE's Draft EIS. Finally, NRC stated its belief that, while DOE is moving in the right direction on QA, much work remains and DOE should tighten up its schedules for resolving QA issues.

DOE recognized the challenge that lies ahead on QA issues. DOE indicated that, at the Commissioners' request, a briefing on the recently distributed Draft EIS would take place on September 21, 1999. DOE also discussed the evolution of its Viability Assessment design towards an enhanced repository design. DOE indicated that the program baselines would soon be changed to reflect the new design. DOE provided its assessment of the impacts that potential budget cuts could have on the repository program including significant staff reductions and the slippage of key program milestones. Finally, DOE indicated its involvement, along with other Federal agencies, in the interagency review of the proposed EPA standards for Yucca Mountain and briefly summarized recent legislative activities that could affect the high-level waste program.

The State of Nevada and the local counties had no opening remarks.

**Quality Assurance Issues Overview:** The meeting focused on management and corrective actions taken by DOE to resolve NRC's concerns with the implementation of DOE's QA program. DOE updated NRC on the status of its FY 1999 priority activities and discussed its commitment to quality. DOE has shifted the program's culture to that of a nuclear environment and DOE described its Nuclear Culture Initiative Action Plan. DOE also discussed the general role of the Yucca Mountain Project Operations Review Board (PORB) and its affect on quality. DOE announced that the manager of its employee concerns program now reports directly to the Yucca Mountain Project Manager.

In order to provide an overall framework for its QA presentations, DOE outlined its multi-year planning for the preparation and issuance of the Final EIS, preparation of the documentary basis for Site Recommendation (SR) and preparation and submittal of the LA. Using the VA as a model, DOE will provide a letter to NRC listing the forthcoming documents that will form the technical basis for the SR. DOE will conduct continuous audits on the work feeding the Process Model Reports (PMR) that form a significant part of the technical basis for SR. While DOE intends to send its proposed siting guidelines at 10 CFR Part 963 to interagency review in the coming weeks, it has contingency plans to use the existing guidelines at 10 CFR Part 960 should the rulemaking not move forward. NRC encouraged DOE to continue its efforts to assure that data required to be qualified at the time of SR was available to NRC in time for its preparation of statutorily mandated SR sufficiency comments. NRC and DOE agreed that it is important for all parties to understand exactly what work will not be qualified in time for the SR. DOE stated that every effort would be made to qualify that subset of overall data that would be considered vital to conclusions related to the safety argument (consistent with the DOE Repository Safety Strategy, Rev. 3).

The State of Nevada representative stated that it would be unacceptable to ask the State to review an SR consideration report based on Revision 0 of the PMRs.

DOE presented a detailed review of major quality-related initiatives, including the implementation of process validation and re-engineering, and the status of corrective actions, the reviews of scientific notebooks, and data, model, and code qualification/validation. Thus far, no fieldwork has to be redone as a result of the review of scientific notebooks. DOE also discussed the challenges related to the measurement of results and effectiveness of quality-related initiatives and corrective actions. NRC acknowledged that improvements in self-reporting can often make a program that is improving appear worse and that demonstrating lessons learned can be more important than raw data.

Consistent with its "on-demand" approach to qualifying work, DOE will prioritize its QA efforts based upon Revision 3 of the Repository Safety Strategy. While NRC would like to see all work qualified in time for SR, DOE indicated that this approach will achieve qualification of the work most significant to performance. With respect to DOE's verification of M&O corrective actions, DOE reported that the M&O adequately incorporated previous Office of Quality Assurance recommendations into the Corrective Action Plan and that actions appear to be on schedule.

In closing remarks, NRC and DOE acknowledged the importance of adhering to the quarterly schedule for these meetings and agreed to schedule the next Management/QA Meeting in November. The Clark County, NV representative expressed concern about reviewing a draft rather than a final SR. The State of Nevada and Nye County, NV representatives had no closing remarks.

No regulatory decisions were requested or made during the meeting.

Miscellaneous Action Items

DOE's response to the Nuclear Waste Technical Review Board's recent letter to DOE regarding repository design selection will be provided to NRC.

In response to an NRC request, DOE agreed to allow the on-site representatives to attend PORB meetings, as appropriate.

DOE will provide the planning documents for SR and Site Suitability as soon as they are available.

DOE agreed to add important QA milestones to its SR and PMR schedule charts.

DOE will check to make sure that the M&O General Manager's letter re-affirming the M&O commitment to quality was sent to all employees.

DOE will check whether any work has to be redone as a result of the review of scientific notebooks.

DOE agreed to provide the OCRWM PMR audit schedule to NRC when available.

DOE will provide the QAMA report to NRC as soon as it becomes available.



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