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MEMORANDUM FOR: File

FROM: *RC* F. Robert Cook, Senior On-Site Licensing Representative, Basalt Waste Isolation Project (BWIP)

SUBJECT: COMMENTS ON THE WASTE MANAGEMENT MEETING 85

The agenda for this Waste Management 85 Conference noticeably lacks presentations dealing with quality assurance issues, plans, procedures and accomplishments. This omission, if reflecting participant activities and interests of managers and leaders in this technical arena, portends a fatal prognosis for the current generation of waste management activities.

This conclusion reflects my understanding of the rigors of NRC's licensing review and hearing process, as well as, the public's ever increasing demands for impeccable quality in decision making, in the analyses supporting those decisions, and in the raw data supporting the analyses.

The application of quality assurances are necessary for ALL aspects and phases of the waste management program--NOT JUST NUCLEAR SAFETY-RELATED ITEMS AFTER AN ARBITRARY POINT IN TIME. Environmental decision making and related analyses and data are equally dependent upon rigorous quality assurance to survive the gauntlet of licensing and public scrutiny.

Those waste management participants and managers excusing themselves and their groups from necessary quality assurance rigors because of impacts on schedules and costs are seeding the waste management cancer. In fact it is my conviction that the only chance of achieving the desired schedule for the repository program and avoiding wasted effort and costs is through management and individual participant commitment to quality assurance actions, recorded and made accessible on a current time frame for public scrutiny.

One unique and necessary feature of waste management quality assurance, not required in many other technical arenas, including the commercial nuclear power arena, is the inclusion of policies and procedures which the public understands and accepts as foolproof. Given this axiom, specific public awareness of and participation in formulation of policies, as a minimum, and NRC, EPA, DOT, State and affected Indian tribe early approval of quality assurance policies and procedures is warranted.

Such a radical departure from the current modus operandi should be pursued to obtain public acceptance and participating

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organization concurrence, to flush the recalcitrant actors from their current roles and to rapidly establish a new modus vivendi.

cf:
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