



*Attachment B*  
UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

September 06, 1984

TO: T. B. Hindman  
J. D. White  
FROM: F. R. Cook

Attached are my August 10, 1984 observations concerning PNL MCC-D2 test records. Thanks for your cooperation.

*151*  
F. R. Cook

attachment: PNL MCC-D2 Test Review  
attachment to:  
cc: HJBell  
MJStendler  
GJBracken  
JMecca  
EABracken  
JEMendel

B508140217 B41003  
PDR WASTE PDR  
WM-10

ATTACHMENT: PNL-MCC D2 data Test Review accomplished by F. R. Cook (NRC BWIP Site Licensing Representative) on August 10, 1984

1. The MCC-D2 notebook does not provide information in way of confirming that day-to-day activities were appropriate. PNL stated there were no such records. The notebook consists primarily of data sheets. It was signed and dated August 9, 1984.
2. There was no record of overchecking of key data and operations.
3. Required qualifications for personnel involved in testing are not identified nor were records of qualifications of test personnel or other participating personnel available for ready review.
4. A records index identifying all pertinent records and their location was not available.
5. Records pertinent to the subject test are dispersed and may not be adequately controlled. A central "original" records management system was discussed.
6. A detailed day-to-day work plan (procedure) implementing the MCC-1P procedure was not prepared. PNL said they are working on such procedures.
7. There is no record of instruments used. MCC-D2 test furnace calibration was not documented. Specifically, instruments used to measure leach specimens were not recorded.
8. Timing between key events, for example, the completion of leaching and chemical analysis of leachates, is uncontrolled. It ranged from 1 day to about 3 weeks in the few samples of data I reviewed.
9. Some data pages from the chemical analyses were not labeled and these data pages were not referenced in the notebook. I did not see any signatures on the chemical analyses data sheets.
10. A determination as to whether the data is important to waste isolation or important to safety was not made. Hence the level of QA to have been applied is unclear. The intent for use of the MCC-1P (D2) data is not clearly stated in any of the records that I reviewed.
11. I was not permitted to review the MCC-D1 data package on PNL 766B glass leaching for comparison purposes. PNL indicated this was not permitted by DOE.

The observations noted above and the comments concerning the lack of various records are based on discussions with Mendel, Lokken, Turcotte, Daniel and other PNL personnel with whom I conferred during the review.

ITEMS FOR LAWRENCE VISIT - 8/31/84

1. General QA awareness. Geologic technical area
2. Issue of design control
3. Water resource uses and natural resource evaluations.
4. Vendors/DOE Part 21 applicable.
5. MCC/MRB defense vs commercial interface in R&D and waste package design.
6. Access to people and records.
7. Qualifications of people/vendors.
8. Specification of Responsibility/authority per QA requirements
9. Control of large # of subcontractors for QA.
10. Geotechnical planning in a controlled manner related to assessments.