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MAR 04 1986

MEMORANDUM FOR: James Kennedy, Section Leader  
 Repository Projects Branch, DWM

FROM: Susan Bilhorn  
 Repository Projects Branch, DWM

SUBJECT: SRPO/NRC WASTE PACKAGE METTING, JANUARY 22-24, 1986

This note represents a brief summary of the subject meeting with regard to Quality Assurance issues. I attended the meeting from January 22 through January 23 and participated in the NRC close-out briefings on both these dates. Comments related to QA included in the meeting minutes addressed the peer review process and information developed under PNL's former QA program (see NRC Comments 7 and 11, Enclosure 1). Included as an open item was a request from NRC for information regarding limitations in the PNL data resulting from deficiencies in the QA program (see Open Item 1).

I have summarized my observations below. Number 1 is directed to SRPO and not the waste package program specifically and was therefore inappropriate in the context of this meeting. Number 2-4 are generic to all projects. Number 3 and 4 represent elaborations of NRC Comments 11 and 7 respectively in the meeting minutes.

1. Audit Reporting -

Prior to my attending this meeting, Dale expressed to me his concern regarding the ability of SRPO audits to report problems and identify resolutions. The message from SRPO to PNL in the September 1985 report was that all had been resolved since the 1984 stop work order and that PNL's QA program is adequate. This was in fact stated during the QA presentation in the following words: "audit showed successful implementation of QA program (Sept. 1985)." It seems premature to reach such a conclusion at this stage in implementation of PNL's new QA program and the SRP may be cultivating a false sense of security. While I raised this concern briefly during the WP meeting, it was clearly the wrong forum for indepth discussion.

2. Need for DWM Decision on Applicability of NQA-1 -

The QA presentations during the WP meeting clearly referenced NQA-1 as the requirements with which PNL's current QA program complies. The NRC QA review plan and 10 CFR 50, Appendix B were also mentioned by PNL during the discussions. I felt, however, that it was necessary to mention that

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the QA program requirements for licensing are addressed in 10 CFR 60 Subpart G and that NQA-1 has not to date been endorsed by the NRC for application to the repository program. Since the DOE QA programs are being developed around NQA-1, I think it is necessary for us to determine what the NRC's position is on endorsing those requirements. Until we can inform DOE of our decision, we need to emphasize that NQA-1 should not be used in isolation of 10 CFR 50 Appendix B and the NRC QA Review Plan, and should alert the DOE to the reasons why we have not yet endorsed NQA-1 for the repository program.

3. Qualification of Existing Data (Non-NQA-1) -

It is unclear how information (including data and analyses) that was collected/performed in the waste package program prior to implementation of an "adequate" QA program will be used. And if used to support licensing, how that information will be qualified. While qualification of existing information is a complex issue with which we are currently struggling to provide generic guidance, I think the most pressing concern is that DOE does not appear to understand the QA deficiencies related to the existing information and has not considered and/or addressed these deficiencies in the current plans for WP program.

4. Role of Peer/Technical Reviews in QA Program -

The technical/peer review process discussed during the QA presentation were unclear. Four review processes were addressed: technical procedure process, peer review, technical review, and design review. It is uncertain how these (especially peer and technical reviews) differ and fit together in the overall QA program. As presented, technical procedure process incorporates "internal project" and "external project" review. These both appear to represent reviews within PNL and SRPO. Both peer and technical reviews apparently involve internal and contractual reviews. Technical reviews were not, however, addressed in any detail.

The establishment of external review groups (composed of numerous "experts" knowledgeable of the program and program requirements but independent from the work reviewed) for the purpose of consistency, continuity and availability seem to be favorable. However there is staff concern with selection of the "experts," to avoid bias and assure technical adequacy, with the contractual agreements used, do they actually provide the necessary cost independence, and with the control SRP/DOE has on final release of peer review information to the public. An example of an independent peer review currently in question is the Ad Hoc

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Corrosion Panel set up by DOE headquarters. SRPO is trying to control the impact of this peer review document by rebutting the technical content.

A related concern - during several presentations, peer review was referenced as a method to reach conclusions on subjects where facts are limited. Though judgement calls will be needed at the current stage and due to the complexity of this program, using the approach SRP/ONWI suggests may not provide information adequate to support a license. Comment 7 of the meeting minutes addresses this concern.

In conclusion, little discussion was provided on the QA programs in the SRPO waste package program. This was due in part to the limited involvement of NRC staff versed in QA during preparation of this meeting. Since much concern was expressed by the technical staff on QA related issues, the need for QA staff attention and future discussion with SRPO is apparent. I think most of the issues raised are generic in nature and should be handled by the QA section. In addition, numbers 3 and 4 above should be discussed in the draft GTP's currently being developed.

*Original Signed Jy.*

Susan G. Bilhorn  
Repository Projects Branch  
Division of Waste Management

Enclosure:  
Summary of SRP/NRC Waste Package Meeting

- cc: R. Johnson
- J. Voglewede
- J. Linehan
- T. Verma
- P. Prestholt
- B. Cook
- D. Hedges

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