UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 09, 1984

MEMORANDUM FOR: Robert E. Browning, Director
Division of Waste Management

FROM: F. Robert Cook, Senior Onsite Licensing Representative
Basalt Waste Isolation Project (BWIP)

SUBJECT: BWIP SITE REPORT FOR WEEK OF JANUARY 29, 1984

1. Reviews of systems to control RHO and subcontractor site characterization actions via procedures, instructions, etc. as specified in RHO BWIP Quality Assurance Plan, RHO-QA-PL-3 Rev 11 of March 23, 1983 were accomplished for barrier materials activities at RHO, PNL and HEDL (Westinghouse) on January 23 and 24, 1984. (The work at PNL and HEDL are under the technical cognizance of RHO personnel and are in support of BWIP waste package materials testing.) These reviews were based on questions concerning procedures included in attachment A. Since procedures for many critical activities do not exist, their review was not possible. This void indicates a deficiency in application of RHO QA requirements and instructions that are pertinent to the control of actions by procedure. RHO indicated that scheduling and budget documents served as test instruction for various testing at RHO.

Attachment B contains a list of further questions which are broader in their probing of the respective QA systems at RHO, PNL and HEDL. The questions are derived from the reviews noted above and reflect my judgement as to areas where the respective QA systems reviewed are not adequately implemented or are deficient in specifying desirable requirements. Qualitatively, PNL's QA system of requirements would probably not be found adequate for collection of information critical to safety. RHO's and HEDL's QA systems are better with the weakest area being in specifying QA instructions for actions pertinent to validating design bases and analytical models used in component design barrier performance assessment. Qualitatively, implementation of QA systems appears best at HEDL and least at RHO. (PNL implementation is reasonable, but their QA system requirements are minimal as noted above.)

2. Attachment B has been reviewed with DOE QA (Bracken). DOE plans to perform an audit of RHO in March and has indicated the questions will be used in planning the audit. RHO QA (Nicol) and RHO BWIP (Ash) are also familar with the questions.

3. This week I began review of the 2 volume BWIP accessions list recently put into DOE's document reading room adjacent to the Science Center. This should be reviewed by Staff and specific comments provided

WM Record File 101
WM Project 10
Docket No.
PDR ✓
LPDR ✓
Distribution:
(Return to WM, 623-SS) Rec'd GH REB 4/84

806

to DOE to improve the usefulness of the documents included on the list. Only about 20% of their project records are included. I will provide detailed comments in the future.

F. Robert Cook

F. Robert Cook
Senior On-Site Licensing Representative

attachments: as noted
cf:
HJMiller
JTGreeves
JOBunting
MRKnapp
RJWright
PSJustus
JJSurmeier
JMHoffman
FRCook
TRVerma
PTPrestholt

Attachment A

1. Are test plans available and, if so, do they define pertinent test parameters; analyses, etc. or refer to appropriate lower tier planning or procedural documents?

2. Are procedures for selecting sample material identified?

3. Are dates specific on documents, and is it possible to relate data collection sheets with data to specific versions of test procedure specifications, plans, etc., ie, with pertinent test documents which data taker needs to run test? Are pertinent documents available to data taker?

4. Are End Function Technical Plans available, and are Test Plans consistent with End Function Plans?

5. Are pertinent procedures concurred in by QA organization people?

6. Are procedures for instrument calibration available for instruments specified in test procedure specifications or other pertinent test documents?

7. When automatic data takers are used are procedures adequate to provide for such data taking, and do they require appropriate documentation of such data? Are automatic data tapes etc, consistent with test procedure data forms. Are provisions provided for QA personnel overchecks?

8. If procedures are violated, is there a procedure for handling data so collected?

9. Do procedures, plans, etc. provide for specific sign offs? Are documents available to people who prepare procedures to tell them pertinent QA requirements including those in NQA-1 and other ANSI documents.

Attachment B

QA PROCEDURES/QA PLANS AND IMPLEMENTATION

1. Are activities associated with experimental/testing work to obtain information directly from observations properly categorized in accordance with QA instructions in MA-4?

2. Are there appropriate support documents which justify categorization of activities per 1 above?

3. Of the information gathering activities critical to safety, are procedures available and consistent with test plans?

4. Is the application of QA overchecks to critical activities consistent with RHO/PNL or Westinghouse practice in the QA organization in other projects - - ie has the responsible organization applied their QA overchecking on a consistent basis? For example compare Westinghouse QA practice for overchecking fuel element characteristics with that of overchecking BWIP project critical-to-safety characteristics.

5. Are management chains of commands as specified on policy documents logically sound and do they clearly identify single responsible individuals for critical activities?

Does the QA activity have clear lines of communication with responsible managers who have authority to do work assigned? Does the QA manager have a direct line responsibility to higher management who has authority to resolve problems as identified on the management plan?

6. Are subvendors required to have QA systems that meet RHO/QA system requirements? Are they properly checked out before contract placement? Do statements of work (SOW) have adequate statements of QA requirements?

7. Has RHO performed subvendor audits in accordance with their QA requirements? What is the record?

8. Does RHO have any evidence that their QA plan meets applicable 10CFR50 Appendix B requirements, and is there any record of which requirements are not applicable and why not?

9. Are activities which are not considered critical activities all controlled by some lesser but identifiable QA system requirements? For example, when analyses are performed by RHO or by a subcontractor or consultant, what QA requirements are invoked and are they consistently implemented?

Attachment B

10. Are documents numbered and assigned code letter/serial numbers in accordance with Project Document Control Procedures? Are document control procedures comprehensive; are there documents which are records which are not covered by document control procedures?

11. Are records critical to safety under the control of the responsible management? For example, are calibration records under the control of the BWIP project manager?

12. Is there a document from the DOE activity having project responsibility as the applicant delegating QA activities to RHO?

13. For all documents where approvals are required, is it written down what the approval means? For example, R. D. Hammonds approval on RHO-QA-PL-3 REV 1L has what significance? Where is this written down and if it is written down does Hannomd in fact know what he should know about the plan?

14. For data collecting activities for data classified critical to safety, are there unambiguous, specific procedures for designating sample material for testing?

15. Have End Function Technical Plans required by policy been prepared? Are technical planning documents within the control of the management responsible to do the job? For example, if a chapter in the SCP is used for planning, does the chapter constitute and adequate control document with proper signatures and details for such a management control document?

16. Other specific questions regarding procedures formed the basis for discussions with RHO, PNL and Westinghouse during the week of January 29, 1984. These questions are attached and can further guide Staff reviews.