



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

November 28, 1983

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

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

SUBJECT: BWIP SITE REPORT FOR WEEK OF NOVEMBER 21, 1983

1. DOE, (Waste Management Headquarters, Cooley) is preparing to submit to the Staff an outline for Site Characterization Plans (SCP's) requesting Staff comments. Many aspects of the plans for each of the sites being considered by DOE can be considered as generic plans, however, most technical planning will be site specific and related to the respective system conceptual designs. Current planning for issuance of the BWIP SCP is January 1985. I consider that a workshop with the BWIP covering SCP content should be scheduled as soon as possible to assure appropriate information is included. I would consider such workshops are warranted for each site.

I am concerned that DOE headquarters activities as well as the BWIP activities, are not currently consistent with the planning considered necessary by the Staff, particularly in light of the apparant generic planning approach being pursued.

2. A review of RHO practices in writing data reports and preparing test procedures indicates deficiencies which may cause data being collected to be unacceptable at licensing. My review covered engineered barriers testing under M. Smith and rock mechanics testing under D. Turner. The following items are examples of problem areas:

a. Final data reports do not consistently identify source material documents such as laboratory note books, actual analyses, test procedures and their revisions, pertinent computer programs and their revisions, data tapes, material procurement specifications, etc, associated with the testing.

b. Test procedures used by the test technician have been draft procedures, ie, they have not received their final reviews by management. This practice seemed to suggest that word changes may be made to test procedures after the testing was completed.

c. Draft procedures used by the test technicians are not readily available, particularly those tests accomplished by RHO subcontractors. To assure records are retained for the extended period associated with the project it would appear necessary that the project maintain a single permanent library for all records.

WM Record File 101
WM Project 10
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These observations indicate need for a QA work shop dealing with record keeping, procedures control etc, compatible with licensing requirements.

F. Robert Cook

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Sr. On-Site Licensing Rep., BWIP

cf: HJMiller
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