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October 26, 1984

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

FROM: Paul T. Prestholt, Sr. OR-NNWSI

PTP

Subject: NNWSI Site Report for Month of October, 1984

I. I took annual leave the first two weeks of the month.

II. The October NNWSI Project Manager-Technical Project Officer (PM-TPD) meeting was held on October 24, and 25. A number of topics discussed are of interest.

A. A meeting between the First Repository States and the DOE was recently held in Denver. One item of discussion was Nevada's wish to drill investigatory bore holes in the vicinity of Yucca Mountain, preferably on the NTS. Under consideration is permission to drill the holes and the funding for the drilling program. Nevada has asked for overall funding of 3.5 million dollars. This is apparently in excess of what the DOE expects to give in grants.

B. The following Schedules concerning the EA were released:

1. December 20, 1984; draft EA released to the public;
2. Two week briefing period following release. A briefing book will be issued;
3. 60 days for hearings;
4. Post hearing period, activities have not yet been determined;
5. June, 1985, release of final EA.

C. The Las Vegas, Nv. EA briefing will be held on

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January 2, 1985. The Las Vegas hearing will be held on February 19, 1985.

D. A probable QA problem arose during discussions of Sandia's "Tuff Data Base". The "Tuff Data Base" is a data control and storage system established 2 years ago at SNL by directive of Dr. Veith. The data base is located on SNL's CDC Cyber 170/855 computer and is managed with System 2000 software that was developed by and is maintained by Intel. Data from investigations by all NNWSI participants and under several dozen major technical headings are placed in the data base.

As I've described previously, the NNWSI has developed a 3 level QA system as follows:

1. Level 1; investigations directly related to licensing with all work accomplished under 10CFR50, App. B and NQA-1;

2. Level 2; investigations of high importance but not directly related to licensing. This work is done under NQA-1. There is a methodology in NVD-196-17 (Rev.2), the Nevada Nuclear Waste Storage Investigations Quality Assurance Plan, to upgrade Level 2 to Level 1;

3. Level 3; investigations that require only good technical practice. These data cannot be upgraded to either Level 1 or 2.

The problem is that the QA level, under which data were acquired, is not included in the data base. In fact, the QA levels are not included in published reports. It is conceivable that individuals working on Level 1 projects may use data obtained under Levels 2 or 3. This could jeopardize the QA standing of the Level 1 project.

In defense of the data base, the NNWSI is just beginning to assign QA levels to projects and data. Sandia intends to assign Level 3 to all data in the data base at present. Future input to the data base will have the QA level included. However, the problem of lower level data being improperly included in higher level work still exists. Unless all investigators exercise a great deal of self discipline in the use of data and proper controls are put in place and used, there is still the danger that otherwise well performed investigations could be contaminated with data collected at lower levels of QA.

III. At his request, I have sent a copy of NVD-196-17 (Rev.2) and the NNWSI Organization Chart to William M. Bland, QA contractor to the Division.

IV. The State of Nevada is holding its monthly "outreach" meeting in North Las Vegas on October 30, 1984. Bob Loux called and invited me to attend. I called Donna Mattson and Cathy Russell, WMPC, and Donna asked me to attend and pay attention to State concerns and problems. I will attend.

V. I received a copy of the package dated October 10, 1984, sent to Max Blanchard, DOE, requesting J-13 water samples and tuff samples for Oak Ridge National Laboratories. Dr. Veith, upon reviewing the package, found that it did not contain an NRC approved QA plan for ORNL as specified in the Site-Specific Procedural Agreement, Appendix 5, Paragraph 5. Dr. Veith told me that he hasn't yet decided whether or not he will honor this request without specific NRC approval of ORNL's QA plan.