

NQA-3

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FEB 13 1989

NOTE TO: FILE

FROM: J. Kennedy

SUBJECT: ATTACHED LETTER FROM ANSI/ASME SUBCOMMITTEE ON NUCLEAR WASTE MANAGEMENT REGARDING NNWSI 88-9 QA PLAN

The attached letters address areas where the NRC accepted QA Plan for the Yucca Mountain Project differ from the draft standard NQA-3 for QA for the high-level waste repository program. We were aware of these deviations at the time of the acceptance of the plan and continue to find the 88-9 QA Plan acceptable for the following reasons:

1. NQA-3 is a draft standard. It has not yet been approved by all of the organizations in the ASME and has yet to be issued for public comment and resolution of public comments by the ASME. After that it will need to be endorsed by the NRC in a Regulatory Guide, a lengthy process that will involve extensive internal and external reviews. The positions in it are therefore not sufficiently mature for the staff to impose them on the DOE.
2. Two positions in NQA-3 are identified as not being addressed in the 88-9 QA Plan. The first concerns retaining of certain samples. There are no regulatory requirements that require samples to be retained, as we explained in our Safety Evaluation of the 88-9 QA Plan dated October 14, 1988. We are concerned, however, about how DOE is controlling samples and are carrying as one of our ten open items the control of samples in their new Sample Management Facility (see minutes for July 7, 1988 meeting with DOE). DOE responded to this open item on January 23, 1989 and the staff is reviewing that response and will be requesting procedures from DOE for review.
3. The second position not addressed concerns requirements for post-closure records. This also is addressed in our Safety Evaluation (see above) which states that the site characterization records which need to be retained post-closure will be decided at a later date (at or near the time of post-closure).

In summary, there is no new information in the letters and our acceptance of the 88-9 QA Plan is not affected.

Distribution and Concurrence see next page

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# COMMITTEE CORRESPONDENCE

committee: Subcommittee on Nuclear  
Waste Management

address writer Battelle Project  
care of: Management Division  
505 King Avenue  
Columbus, Ohio 43201

subject: ANSI/ASME NQA-3

date: January 16, 1989

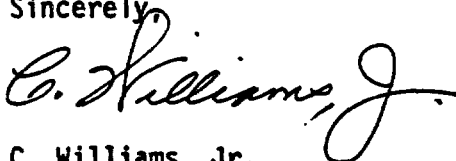
copy to: J Kennedy  
B Mazo  
J Perry  
K Sommers  
D Troxell  
S Weinman

to: SCNWM Members

Attached for your information is a copy of Stan Klein's comparative review made of the requirements of NQA-3 and Yucca Mountain Project QA Plan (NNWSI/88-9, Rev 2.) The results of Stan's review will be considered for incorporation into the next revision of NQA-3.

NQA-3 Draft 4, Rev 0 will be balloted by the BNCS within the next two months. The result of the balloting will be available for appropriate action by the SCNWM during the April meeting.

Sincerely,



C. Williams, Jr.  
Chairman  
Subcommittee on Nuclear  
Waste Management

CW:dsh

Q-89-005

Attachment

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## ENCLOSURE 1

### NQA-3 Comparative Review vs. NNWSI/88-9, Rev. 2

With the exception of the areas discussed below, NNWSI/88-9, Rev. 2 complies with the intent of ANSI/ASME NQA-3 (Draft):

#### Item 1

NQA-3, Draft 3, Rev. 2, Section 8.1 (d) specifies that there shall be representative archival samples maintained from difficult to repeat sample collection activities such as principal bore holes. This requirement should be deleted. It may be difficult to maintain representative archival samples of all samples that are collected. In addition, the benefit of maintaining these archival samples for some undefined period of time is uncertain. Controls presently in place at the Sample Management Facility for the Yucca Mountain Project will effectively insure that all samples will be properly allocated to support all site characterization activities.

#### Item 2

NQA-3, Draft 3, Rev. 2, Section 17.3 establishes requirements for Post-Closure Quality Assurance Records. These requirements should be deleted. The purpose of this proposed standard is to set forth the quality assurance program requirements for the collection of scientific and technical information for site characterization of high-level nuclear waste repositories. Accordingly, establishing requirements for Post-Closure QA records is premature and should not be part of this document.

BDA 840113 0003

RECEIVED

# COMMITTEE CORRESPONDENCE JAN 16 1989

C. WILLIAMS JR.

committee: Subcommittee on Nuclear Waste Management

address writer care of:

Science Applications Int'l Corp.  
101 Convention Center Drive  
Suite 407  
Las Vegas, NV 89109

subject: ANSI/ASME NQA-3

date: January 10, 1989

copy to: J. Estella

to: Clarence Williams

As you know, the NRC requested that a comparative review be made of the requirements of ANSI/ASME NQA-3 against the requirements contained in the Yucca Mountain Project QA Plan (NWSI/88-9), Revision 2. As a result of that review, there were two areas where the documents are not consistent. These inconsistencies are explained in detail in the enclosure to this letter. These areas will require further consideration by both DOE and the NRC, particularly since the NRC accepted Revision 2 of NWSI/88-9 on October 14, 1988.

You are already aware of other areas where a liberal interpretation of NQA-3 requirements is necessary in order to state that the documents are consistent (my previous comments on NQA-3).

If you have any questions or require further information, please advise.

Sincerely,

SCIENCE APPLICATIONS  
INTERNATIONAL CORPORATION

  
Stanley H. Klein, Manager  
Quality Assurance

SHK:JWE:dm

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