

NOTE TO: M. Delligatti

APR 18 1988

FROM: N. Voltura

SUBJECT: QA SECTION REVIEW COMMENTS OF THE FOLLOWING DOCUMENTS:

- A) DRAFT INTERIM REPORT ON DEVELOPMENT OF THE HIGH-LEVEL NUCLEAR WASTE LICENSING SYSTEM PROGRAM ARCHITECTURE BY THE CNWRA, DATED 3/21/88
- B) CNWRA "MEETING NOTES" FROM 4/15/88 BETWEEN J. BUNTING AND CNWRA STAFF

Based on a cursory review of the subject documents, which were received by DHLWM-HLOB QA Section on April 15, 1988, the following comments are submitted:

Reference A:

- 1) The QA Section staff's review of the draft CNWRA CQAM resulted in identifying major areas in the Program that had to be upgraded to meet 10 CFR 50, Appendix B. The staff's comments also reflect areas in the SWRI Nuclear QA Program Manual which require clarification. These comments were discussed with Center QA management on March 10, 1988.

In that both of these documents are now being invoked in the implementation of the subject "interim plan" without having addressed staff comments of 3/10/88, the concern is that implementation of the "interim plan" may reflect those weak areas where the staff has requested that additional information be addressed. Should these weak areas be implemented in the design of the "Program Architecture", potential problems will be inherent in the system.

- 2) A brief review of the subject Interim Plan - Section 6 "Quality Assurance" has resulted in the following:
 - a) Define and describe the "essential features" of the draft CQAM that are incorporated in the plan.
 - b) Define "good engineering" practices.
 - c) Describe the qualifications required of the individuals performing the PARC reviews.
 - d) Clarify how these reviews are presently being conducted (i.e., App. 2), when Section 6 states: "...Criteria are currently being developed to ensure that these reviews are conducted in a uniform manner, that results are repeatable, and that the basis for decision-making is clearly documented." In addition, "Table 5, Seven-Stage QC and QA Process for the PA Relational Database" states that review criteria is "to be determined" (TBD).


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Reference B

- 1) There is a statement which reads: "...Your proposed "get-well" QA plan (the use of a Program Architecture Review Committee - PARC) appears to have the essential conceptual elements to be successful." However, as this plan invokes the CQAM and the SWRI NQAM which need to be modified, this statement would appear to endorse a weakened approach.

Please advise if we can provide additional input in the future.

 4/18/88
N. Voltura

cc: J. Bunting
J. Kennedy
B. J. Youngblood
M. Bell
R. Browning

DELLIGATTI MEMO

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