

REECO QAPP

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MAY 05 1989

Mr. Ralph Stein, Associate Director
Office of Systems Integration and Regulations
Office of Civilian Radioactive Waste Management
U. S. Department of Energy, RW-24
Washington, D. C. 20545

Dear Mr. Stein:

SUBJECT: REVIEW OF REECO QAPP

The U. S. Department of Energy (DOE) forwarded the Reynolds Electric and Engineering Co., Inc. (REECO) Quality Assurance Program Plan (QAPP), 568-DOC-115, Revision 7 to the U. S. Nuclear Regulatory Commission (NRC) by G. J. Appel's letter to J. J. Linehan dated February 21, 1989. The QAPP is a description of the QA requirements and controls that are applicable to quality-affecting activities that are the responsibility of REECO on the Yucca Mountain Project (YMP).

The DOE transmittal letter states that QAPP 568-DOC-115, Revision 7 meets all the requirements in the Nevada Nuclear Waste Storage Investigations (NNWSI) Quality Assurance Plan 88-9, Revision 2 which are applicable to the responsibilities of REECO on the YMP. NNWSI 88-9, Revision 2 was accepted by the NRC staff in December 1988.

The staff has reviewed 568-DOC-115, Revision 7 to determine whether the QAPP contains adequate requirements and controls to address the applicable criteria of Appendix B to 10 CFR Part 50. The bases for our review were the criteria contained in the NRC "Review Plan for High-Level Waste Repository Quality Assurance Program Descriptions" Revision 2 dated March 1989 and NRC staff guidance documents and consensus standards referenced therein.

As a result of our review, the NRC staff has generated the 6 enclosed comments which were discussed with DOE, the State of Nevada, and NRC during a May 4, 1989 telephone conversation. These comments are not significant enough to delay the acceptance audit of REECO currently scheduled for June 1989. However, the comments should be satisfactorily resolved prior to commencing construction activities on the ESF.

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Should you have any questions on our review, please contact Brian Thomas of my staff on (301) 492-0435.

Sincerely,

ORIGINAL SIGNED BY

John J. Linehan, Director
Respository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management

Enclosure: NRC Comments

- cc.: R. Loux, State of Nevada
- C. Gertz, DOE/Nevada
- K. Turner, GAO
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
- S. Bradhurst, Nye County, NV

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COMMENTS ON REECO QAPP

NRC COMMENTS

1. Criterion 1.17 of the RP states, "Provisions are established for resolving allegations of inadequate quality. These allegations may originate within the responsible organization(s) or from outside the responsible organization(s)."

This criterion is not addressed in the QAPP.

2. Criterion 2.8 of the RP states, "A policy statement signed by a senior management official renders the implementation of the QA program mandatory."

This criterion is not addressed in the QAPP.

3. Criterion 5.4 of the RP states, "Provisions are described for controlling changes to field and laboratory procedures associated with exploratory investigations within the site characterization program to assure that such changes are subsequently documented and verified in a timely manner by authorized personnel."

This criterion is not addressed in the QAPP.

4. Criterion 14.5 of the RP states, in part, "Procedures are established and described to control altering the sequence of required tests, inspections, and other operations important to safety."

This criterion is not addressed in the QAPP.

5. Criterion 17.3 of the RP identifies data that should, where applicable, be contained in inspection and test records.

This criterion is not addressed in the QAPP.

6. Criterion 17.7 of the RP states, "Suitable facilities for the storage and securing of records are described and used to preclude deterioration, damage, loss and misuse of records."

Paragraph 10.2.1 of the QAPP, single facility, does not include the requirement for forced-air circulation and a filtration system as required by NNWSI 88-9, Revision 2.