

QAPP-01 REVISION 5

- 1 -

JUN 20 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:

On April 14, 1989, the U. S. Department of Energy (DOE) forwarded the U. S. Geological Survey (USGS) Quality Assurance Program Plan (QAPP) -01, Revision 5 for U. S. Nuclear Regulatory Commission (NRC) review and acceptance. The QAPP is a description of the quality assurance (QA) requirements and controls that are applicable to quality-affecting activities that are the responsibility of USGS for site hydrology and geological characterization of the Yucca Mountain Project (YMP).

NNWSI 88-9, Revision 2 "Quality Assurance Plan" which establishes the QA requirements for the YMP was accepted by the NRC staff in December 1988. QAPP-01, Revision 5 is intended to meet the requirements of the 88-9 QA Plan, Revision 2 which are applicable to the responsibilities of USGS on the YMP.

The staff has reviewed the document to determine whether the QAPP contains adequate requirements and controls to address the applicable criteria of Appendix B to 10 CFR Part 50 which apply to USGS for the DOE YMP. The basis 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 staff guidance documents and consensus standards referenced therein. Selected procedures prepared by USGS to implement the QAPP will also be reviewed by the NRC staff as a part of its evaluation of the future DOE audit of USGS.

As a result of our review, the staff has generated the five enclosed comments which were discussed with DOE and the State of Nevada during a June 7, 1989 telephone conversation. Upon receipt of an acceptable resolution of the five comments, the NRC staff will find that the USGS QAPP-01, Revision 5 meets the applicable criteria of Appendix B to 10 CFR Part 50 and is acceptable.

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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  
Repository Licensing and Quality  
Assurance Project Directorate  
Division of High-Level Waste Management

Enclosure: NRC Comments

cc: R. Loux, State of Nevada  
M. Baughman, Lincoln County, NV  
S. Bradhurst, Nye County, NV  
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ENCLOSURE

NRC COMMENTS

1. Criterion 1.11 of the Review Plan (RP) states, in part, "...The extent of QA controls is determined by the QA staff in combination with the line staff and is dependent upon the specific activity, its complexity, and its importance to safety or waste isolation as defined in 10 CFR Part 60.2."

This criterion is not addressed in the USGS QAPP.

2. Criterion 1.18 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 USGS QAPP.

3. Criterion 5.4 of the RP states, in part, "Provisions are described for controlling changes to field and laboratory procedures associated with exploratory investigation within the site characterization program..."

This criterion is not addressed in the USGS QAPP.

4. Criterion 6.2 of the RP states in part "...procedures assure that the technical ... requirements are correctly included...through reviews by qualified authorized personnel who did not provide input to the document.

In the USGS QAPP, there is no provision for a technical review of documents by qualified authorized personnel who did not provide input to the document.

5. Criterion 12.2 of the RP states, "QA and other organization's responsibilities are described for establishing, implementing, and assuring effectiveness of the calibration program."

This criterion is not addressed in the USGS QAPP.