

QAPP-002

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MAR 22 1989

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

Dear Mr. Stein:

On February 21, 1989, the U. S. Department of Energy (DOE) forwarded the Fenix and Scisson (F&S) Quality Assurance Program Plan (QAPP), QAPP-002, Revision 6 for U. S. Nuclear Regulatory Commission (NRC) review and acceptance. The QAPP is a description of the QA requirements and controls that are applicable to quality-affecting activities that are the responsibility of F&S as the Architect-Engineer for the Exploratory Shaft Facility (ESF) sub-surface facilities and also as providing drilling support for the Yucca Mountain Project (YMP).

NNWSI 88-9, Revision 2 "Quality Assurance Plan" which establishes the quality assurance (QA) requirements for the YMP was accepted by the NRC staff in December 1988. QAPP-002, Revision 6 meets all the requirements in the 88-9 QA Plan, Revision 2 which are applicable to the responsibilities of F&S 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 F&S 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" dated March 1989 and staff guidance documents and consensus standards referenced therein. Selected procedures prepared by F&S to implement the QAPP were also reviewed by the staff as a part of its evaluation of the upcoming DOE audit of F&S.

As a result of our review, the staff has generated the two enclosed comments which were discussed with DOE during a March 2, 1989 telephone conversation. Comment No. 1 addresses the "extent of QA controls" determined by the QA and the line organizations, and "resolution of allegations" is addressed in Comment No. 2. Neither of these comments is significant enough to delay the acceptance audit of F&S currently scheduled for April. However, both comments should be satisfactorily resolved as soon as possible prior to commencing construction activities on the ESF.

Upon receipt of an acceptable resolution of the two comments, the staff will find that the F&S QAPP-002, Revision 6 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 Jim Conway of my staff on (301) 492-0453.

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
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ENCLOSURE

NRC COMMENTS

1. Criterion 1.11 of the 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 requirement is not addressed in the 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 QAPP.