



Department of Energy
Washington, DC 20585

HQO.871118.0035

NOV 18 1987


B. J. Youngblood
Division of High Level Waste Management
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

Enclosed for your review are the responses to the NRC's "Request for Additional Information" on the SRPO QA Plan, Revision 0 (reference letter Linehan to Knight, dated March 9, 1987). Please note that all references to sections of the SRPO QA Plan are to revision 1 of this Plan.

Should you have any questions, please contact Karl Sommer at (202) 586-1639.

Sincerely,


James P. Knight, Director
Siting, Licensing and Quality
Assurance Division
Office of Civilian Radioactive
Waste Management

Enclosure

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PDR WASTE
WM-16 PDR

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WM Project: WM-16
PDR w/encl
(Return to WM, 623-SS)

WM Record File: 106.4
LPDR w/encl



SRPO Response to the NRC's "Request for Additional Information" on SRPO Quality Assurance Plan, Revision 0, dated 12/4/85. All references are to revision 1.

NRC COMMENT WHERE RESOLUTION CAN BE FOUND AND EXPLANATION AS APPLICABLE.

1. Subject of comment is not currently addressed in OGR/B-3 document. SRPO will address when addressed by OGR/B-3.
2. Delegated authority is noted in Attachment B (section 1) and further explanation of "who" is found in Chapter 8.6 of the SCP.
3. Attachment C (section 1) shows the SRP interfaces, reflecting SRPO direction to contractors. Although SRPO delegates certain tasks/requirements to contractors, SRPO retains responsibility (section 1.4.2.3 and attachment B).
4. Section 1.3.1 has been reworded to reflect execution of the Project Managers QA responsibilities beyond approval of the QA Plan and QA Administrative Procedures.
5. Section 1.3.5.1 (d) reads: "Performance of.... effectiveness. The minimum frequency of these audits are annual per each contractor.
6. See Attachment A of section 1. This reflects all organizational elements that are working under the SRPO QA Plan and QA Administrative Procedures. Contractors work to their SRPO approved QA Plan and procedures, as required by their SRPO approved/issued QA specification.
7. Sections 2.3.3 (Graded Quality Assurance), section 2.3.4 (Quality Classifications) and QA Administrative Procedure 2.5, rev. 0, describes the determination of SRPO QA controls.
8. Section 15.3.2.1 (d) , section 16.3.2.1 (c) and QA Administrative Procedure 15.2, rev. 0. The QA Administrative Procedure 15.2 describes the initiation, completion and retention of Stop Work requests.
9. Section 2.2 clarifies this and also references OGR direction regarding Q-list (important to safety and waste isolation) items.
10. Section 2.4.1 commits to NUREG-0856 for guidance.

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11. Section 1.3.5.1 (g) states: "Review and concurrence of the SRPO QA Plan and the QAAP's".
12. This level of detail is not in the QA Plan, however QAAP 5.1 is being revised to include existing and proposed QAAP's and development responsibilities.
13. See section 3.3.2, 3.3.2.1, 3.3.2.2, 3.3.2.3 and 3.4 (The RD is baselined).
14. Sections 3.3.1, 3.3.2, 3.3.3 and 3.3.4 describe responsibilities for preparing, reviewing, approving, verifying and validating design and design information documents.
15. Section 3.3.3.1 describes QA involvement/responsibilities regarding design documents. The NRC comment concerning section 3.3.2.4 (a) is no longer applicable due to deletion.
16. No change required - As used here, design verification includes design checking. 10 CFR 50 Appendix B, Criterion III requires that design verification "or" checking (synonymous) be performed. This verification/checking is performed by means of design reviews, use of alternate calculations, performance of qualification tests, and peer reviews; as described in the Plan and implementing QAAP's, as applicable. The independence of the verifier is covered in section 3.4.5.3.
17. See sections 3.4.9, 3.4.9.1, 3.4.9.2, 3.4.10, 3.4.10.1 and 3.4.10.2.
18. Section 4.3.2 and 4.3.2.1 clarifies this comment. Section 7.3.2 and 7.3.2.1 clarifies the latter portion of this comment. New SRPO organization gave all procurement responsibilities to the Director, Project Management Division.
19. Sections 5.3.1, 5.3.1.1 and 5.3.2.1 describe SRPO responsibility and how it is met.
20. Sections 3.3.3.1, 6.3.2.3 and 7.3.3.1 (c) clarifies that QA reviews/concurs as related to quality aspects.
21. Section 7.3.1.1 (e) clarifies delivered item (s) and subsequent responsibilities. Section 7.3.3 explains QA Manager.

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22. Sections 7.4.4, 7.4.5 and 7.4.6 clarifies this comment.
23. Sections 9.2, 9.4 and 9.4.2 clarifies this comment.
24. Sections 8.2, 9.2 and 10.2 state that the requirement of these sections has been delegated to Prime Contractors for performance; and sections 8.3.2.1, 9.3.2.1 and 10.3.2.1, respectively, state that the QA Manager is responsible for the performance of audits/surveillances to verify proper implementation of these sections.
25. SRPO only performs inspection activities as an overview (audit/surveillance) function and not for acceptance (section 10.3). Section 10.3.2.1 describes QA's involvement.
26. See comment for #25 (above) plus section 10.4.5 (c) clarifies as "Contractor QA organization".
27. Section 10.3.2.1 shows QA involvement. Section 10.4 requires procedures, controlling inspections to be performed. These procedures are reviewed/approved by SRPO prior to implementation. Compliance to these procedures is then audited/surveilled by SRPO QA. "Expertise" is determined by delegated contractor and approved by SRPO.
28. See section 11 in its entirety, this activity is delegated to Prime Contractors for performance.
29. Section 15.1 includes technical requirements, also see 15.3.2.1 (a), 1st. bullet and 15.3.2.1 (c).
30. Sections 16.4.1.2 and 16.4.1.5 clarifies this comment.
31. Sections 16.4.2, 16.4.3 and 16.3.4 clarifies this comment.
32. Section 16.1 elaborates, by example, on the term "conditions adverse to quality". Significant conditions adverse to quality is defined in the glossary and also in section 16.4.6. The term "significant quality problem", as used here is synonymous with "significant condition adverse to quality". "Trends adverse to quality" and "significant adverse trend" is to be clarified in the QAAP on Trending (still in the formative draft stage).

Section 16.3.2 and 16.3.3 identifies the responsible position titles.

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| 33. | Sections 17.1, 17.2, 17.3.1 and 17.4.2 identifies records to be maintained in the records management system. |
| 34. | Responsibilities are identified in sections 17.3.2.1, 17.3.3.1 and 17.3.5. |
| 35. | Post closure is beyond the scope of SCP activities. |
| 36. | See section 18.4.1 (d). |
| 37. | See sections 18.4.7, 18.3.3.1 (d) and 18.4.1 (c). It should be noted that the "issued" Standard Review Plan that SRPO works to does not contain 18.9. |
| 38. | See section 18.4.9 (wording change). The NRC viewed this as a requirement and it was not intended as such. |

WM DOCKET CONTROL
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WM Record File
106.4

WM Project 16
Docket No. _____

PDR ☒
LDR ☒ (S)

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