

MAR 03 1989

Mr. Robert Loux, Director  
 Agency for Nuclear Projects  
 Nuclear Waste Project Office  
 State of Nevada  
 Carson City, NV 89710

Dear Mr. Loux:

Enclosed is a copy of the minutes from the February 22, 1989 meeting among the staff of the U. S. Nuclear Regulatory Commission (NRC), and representatives from the State of Nevada and its contractor, Sargent and Lundy. The minutes were prepared by the staff and Ms. Susan Zimmerman of the Nuclear Waste Project Office (NWPO). As is discussed in the minutes, resolution has been reached on 30 of the 32 staff comments on the NWPO quality assurance manual. Resolution of the remaining two issues is dependent upon actions by the staff for one, and the State of Nevada for another. The details of the disposition of the staff's comments are given in the enclosure.

If you require any additional assistance, please feel free to contact the NRC project manager for quality assurance, Mr. Joe Holonich. Mr. Holonich can be reached at (301) 492-3403.

Sincerely

**ORIGINAL SIGNED BY**

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

Enclosure: As stated

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| NAME:JHolonich | :JKennedy | :JLinehan | : | : | : | : |
| DATE:02/11/89  | :02/21/89 | :02/21/89 | : | : | : | : |

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ENCLOSURE

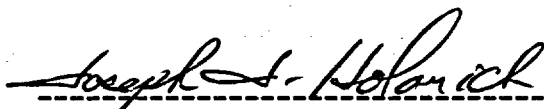
On February 22, 1989, members of the U. S. Nuclear Regulatory Commission (NRC) staff, representatives from the Nuclear Waste Project Office (NWPO) of the State of Nevada, and Sargent and Lundy, the State of Nevada's contractor met to discuss the State's responses to the staff's comments on the NWPO Quality Assurance Manual, Volume 1. A list of attendees is given in Attachment 1.

Out of the 32 staff comments, two remain as action items: one for the staff and one for the State. Revised language for the NWPO QA Manual will be drafted and discussed with the staff prior to the formal revision of the NWPO QA Manual. The remaining comments were resolved and closed, pending the drafting of acceptable revised wording for the NWPO QA Manual. The action item for the staff regards Comment 6 that deals with the legal aspects of the NWPO QA program, and the action item for the State of Nevada pertains to Comment 25 that discusses nonconformances and the disposition, "use-as-is." A disposition of all of the comments is given in Attachment 2.

There was a discussion about the contents of the letter that NRC will send to the State of Nevada after completion of the staff's review of the revised QA plan. The staff informed the State of Nevada that it would determine if the NWPO QA plan generally met the requirements of the Code of Federal Regulations, Title 10, Part 50, Appendix B (10 CFR). However, the staff would be unable to evaluate the implementation of the State of Nevada's program because the staff would not be conducting any audits of the State of Nevada.

There was also a discussion about applying a 10 CFR Part 50, Appendix B QA program to earth-science work that the State is conducting. The State of Nevada stated that there were really no fundamental problems in adapting 10 CFR Part 50, Appendix B to a geotechnical program. The State of Nevada indicated that 10 CFR Part 50, Appendix B has general requirements, and the staff has been reasonable in interpreting them for earth-science work. The State also indicated that their two main concerns in applying QA to earth-science work were that it is not possible to predict in advance all of the steps in a procedure for a scientific investigation and that changes to the procedure need to be made by the investigators. They stated that the staff had permitted the State of Nevada to build into their program the flexibility needed to address these concerns.

Overall, the meeting was productive and the interaction between the State of Nevada and the staff was beneficial.



Joseph J. Holonich  
Senior Project Manager  
Manager  
U.S. Nuclear Regulatory Comm.



Susan Zimmerman, Quality  
Assurance

Nuclear Waste Project Office  
State of Nevada

Attachment 1  
List-of-Attendees

NRC

J. Holonich  
J. Kennedy  
R. Virgilio  
W. Belke

State-of-Nevada

C. Johnson  
S. Zimmerman

Sargent-and-Lundy

A. Dolgoff  
S. Taylor

Attachment 2  
Disposition-of-Staff-Comments

| <u>Comment<br/>Number</u> | <u>Disposition</u>  |
|---------------------------|---|
| 1                         | This response is acceptable to the staff  |
| 2                         | The State of Nevada will say that it will comply with applicable requirements and evaluate this on a case-by-case basis.  |
| 3                         | This response is acceptable to the staff.   |
| 4                         | The State of Nevada will reference its procedure QAP-2.3 in this section. This is acceptable to the staff.  |
| 5                         | This response is acceptable to the staff.   |
| 6                         | The staff needs to get future guidance on this issue from the NRC Office of General Counsel.  |
| 7                         | This response is acceptable to the staff.   |
| 8                         | This response depends upon the response to Comment 31.  |
| 9                         | This response is acceptable to the staff.   |
| 10                        | This response is acceptable to the staff but the State of Nevada will provide a list of procedures.   |
| 11                        | This response is acceptable to the staff.   |
| 12                        | This response is acceptable to the staff, but the State of Nevada will consider provisions for using bound books. The staff will provide the State of Nevada with a procedure to use as an example. |
| 13                        | This response is acceptable to the staff.   |
| 14                        | This response is acceptable to the staff.   |
| 15                        | This response is acceptable to the staff.   |
| 16                        | The State of Nevada needs to better explain its discussion of special processes.  |

- 17 This response is acceptable to the staff.
- 18 This response is acceptable to the staff.
- 19 This response is acceptable to the staff.
- 20 This response is acceptable to the staff.
- 21 This response is acceptable to the staff.  
However, the staff is concerned that the  
Quality Assurance manager for the State  
of Nevada has too broad a job to be able  
to perform her necessary duties effectively.
- 22 This response is acceptable to the staff.
- 23 This response is acceptable to the staff.
- 24 This response is acceptable to the staff.
- 25 This response is an open item for the State  
of Nevada. The State needs to evaluate this  
and provided further discussions.
- 26 This response is acceptable to the staff.
- 27 The staff will further evaluate this response.
- 28 This response is acceptable to the staff.
- 29 This response is acceptable to the staff.
- 30 This response is acceptable to the staff.
- 31 The State of Nevada will revise this answer  
to discuss the need for supplemental audits.  
In addition, the State will review  
Regulatory Guides 1.28 to assist it in  
revising this response.
- 32 The State of Nevada will clarify this response.