

MBell

# COMMITTEE CORRESPONDENCE

committee: Subcommittee on Nuclear  
Waste Management

address writer  
care of

Battelle Project  
Management Division  
505 King Avenue  
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subject: State of Nevada Comments  
on NQA-3

date: March 17, 1988

copy to:

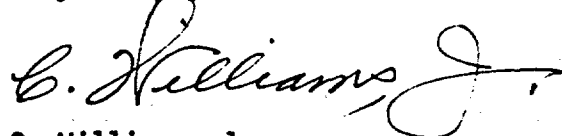
B Mazo  
J Perry  
S Weinman

SCNWM

The attached letter is forwarded for your information. I would appreciate any comments you may have on the letter.

Thanks.

Very truly yours,



C. Williams, Jr.  
Chairman  
Subcommittee on Nuclear  
Waste Management

CW:dsh

Q-88-025

Attachment



The American Society of  
Mechanical Engineers

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PDR WASTE  
102.3 DCD

Keep ASME Codes and Standards Department Informed

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March 10, 1988

Mr. Clarence Williams, Jr.  
Chairman, ASME Subcommittee on  
Nuclear Waste Management  
Battelle Project Management Division  
505 King Avenue  
Columbus, Ohio 43201

Dear Mr. Williams:

Regarding your letter of February 11, 1988, this Office has reviewed your letter with its attachments and our previous comments on NQA-3. The previous comments are still appropriate, and we can find no reason to change our prior comments at this time. Furthermore, we offer the following comments to your letter:

1. Regarding the attached endorsements for NQA-3, the U.S. Department of Energy is in no way and will never be required to abide by NQA-3 if it is ever issued, unless the NRC formally adopts the standard and revises 10 CFR 60, Subpart G to endorse this new standard.
2. There is no State involvement on the subcommittee formulating this standard. We, too, are "directly involved in, and fully aware of site characterization activities".
3. Many of the members of the subcommittee are contractors of DOE with a financial stake in the activities of site characterization. Consequently, their independence is questionable.
4. DOE has a member on the subcommittee and DOE is in charge of the whole site characterization program. Again, the independence of the subcommittee is questionable.
5. You state that the subcommittee members are "expected to obtain the review and comments of their scientific and

geotechnical organizations". Are these reviews and comments documented and available for State review? I hardly believe these organizations speak for the geotechnical community.

6. Did the NRC ever reply to Mr. Kraft's letter requesting a position statement endorsing NQA-3? If not, why not?
7. In no way does your letter of February 11, 1988 constitute resolution of the State's comments on NQA-3.

Again, we do not believe NQA-3 is warranted for site characterization. If later consensus is that NQA-3 is necessary, we believe that NQA-3 would only be effective as a stand-alone document, not as a supplement to NQA-1 and NQA-2. And, we still believe that sister geological societies should have a direct involvement in the formulation of this standard, if it is to be valid and effective. I am still willing to meet and discuss this subject at any time.

Sincerely,



Carl A. Johnson  
Administrator of  
Technical Services

CAJ/mm