FEB 07 1989

MEMORANDUM FOR: Robert E. Browning, Director
Division of High-Level Waste Management

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

SUBJECT: JANUARY 12-13, 1989 VISIT TO ON-SITE REPRESENTATIVES (OR'S)

On January 12-13, 1989 I visited with the OR's for the following reasons:

1. To review and discuss status of OR activities and interactions with both DOE and DOE contractors and NRC staff.

2. To review with the ORs monthly reports issued over the past 6 months.

3. To discuss areas of focus for the ORs over the next several months.

4. To discuss any significant concerns or issues the ORs have with DOE or NRC activities.

5. To observe and participate in OR interactions with DOE staff and management and DOE contractors.

Monthly Reports

- In accordance with the split of responsibility for different technical areas of the program, the ORs will each submit their own monthly report, due by the 15th of the next month.

- While the overall quality and usefulness of reports issued in the past 6 months was very high, I discussed areas for expansion and improvement, including:

  - more focus on evaluation of program activities

  - followup on resolution of audit findings and other open items;

  - determination of whether DOE understands the intent of our letters, comments, and guidance documents and whether they are considering them; and

  - identification of issues.

  Upon initial identification of any significant issues the ORs will bring them to the attention of the PM's or myself to make sure they fully understand NRC activities related to the issue and try to reach agreement on appropriate followup. The technical aspects of issues may also need to be coordinated with the appropriate SL. If the ORs cannot reach agreement with the PMs

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they will raise the issue to me. The issues and recommended follow-up will then be documented in the monthly reports. If they have no issues they will indicate "There are no new issues requiring management attention." I also reviewed with Prestholt and Gilray previously issued guidance on the OR role and identification of issues and reviewed the major issues Prestholt had identified in the past. He still has a major concern with the lack of focused NRC/DOE interactions as discussed later in this memorandum. I will review the status of any outstanding issues with the ORs during their trips to HQ and my visits to Las Vegas both of which will be scheduled more frequently.

Focus of near-term OR activities

In addition to items addressed in discussions on the monthly reports I requested the following:

- identification of topics for on-site reviews, to be coordinated with PMs and as needed with SLs on technical aspects, prior to submittal;

- need to adjust respective schedules for ORs and secretary to provide coverage of office to the extent possible without interfering with interactions with DOE, DOE contractors and State of Nevada and county representatives;

- increased coverage of waste package and surface facility areas by Gilray in addition to his focusing on QA and the design acceptability of the ESF;

- review of internal NRC drafts of TPs and rulemakings as well as interacting with DOE and DOE contractors to understand their technical concerns with draft TPs and rules; and

- need to understand DOE and DOE contractor's planning and scheduling activities, including visits to contractors as needed.

Interactions with DOE and contractors

During my visit I talked briefly with E. Wilmot and other DOE staff and contractors, attended a discussion of the status of pre ESF construction activities and the management control program covering these activities, and observed the QA surveillance team's closeout with DOE on their surveillance of DOE's Design Acceptability Analysis activities.

My discussions with Wilmot focused on the OR interactions and the need for more timely and less formal NRC/DOE staff interactions on technical issues. Both Prestholt and Wilmot indicated the working relationship was good. I indicated I would be asking the ORs to focus more on understanding DOE technical concerns with our letters, comments, and guidance documents so that we could consider these concerns in our ongoing work. At a management level, both Prestholt and Wilmot agreed to consider a weekly meeting that would be in addition to the weekly meeting the ORs have with Gertz.

I also attended a presentation to the ORs on the DOE project's management control program for start of ESF construction. DOE staff explained the matrix organization they use to control this activity as well as a Level "0" Network,

a more detailed prerequisite schedule for start of the ESF, and the various prerequisite activities they have identified prior to start of ESF Title II activities. While my exposure to this program was at an overview level, it appeared to be a well thought out management control program. While the program does require Level I QA and includes readiness reviews and QA surveillances, Gilray identified a potential problem regarding lack of involvement by QA which he will follow up on. We also requested an opportunity for NRC involvement in the readiness reviews. Wilmot and I agreed that the ORs would meet with DOE on the status of the program weekly. This should allow us to be better able to factor DOE's activities into our planning and provide DOE with any areas of NRC concern, particularly as they develop prerequisite activities for start of the ESF construction. Any new concerns identified by the ORs, not already officially raised by NRC, would be formerly transmitted to DOE by HLPD.

I attended the surveillance close out meeting between the DOE project staff and the DOE/HQ team conducting a surveillance of the Design Acceptability Analysis activities. This meeting was also attended by a representative of the State of Nevada. The team identified SDRs that will need to be resolved by DOE prior to submittal of the DAA to NRC. The most significant items to me appeared to be concerns with adherence to 88-9, the NNWSI QA plan, and the conclusion by the team that DOE's determination of the reasonableness of data, used in the ESF analysis, by comparing it to data in the EA and SCP, was not adequate.

In the course of our discussions DOE indicated they would anticipate our receiving the ESF related study plans within a month. We also discussed the possibility of meetings on these for purposes of clarification once NRC staff completed its initial review.

OR Concerns

The two main concerns raised by Prestholt were the lack of focused technical interactions between NRC and DOE and the lack of utilization of and communication with the ORs by the technical staff. Regarding interactions with DOE I explained the actions we have taken, including elevating the issue with Rousso. On communications and interactions with technical staff Prestholt indicated he has been essentially never contacted by a number of technical SL's and staff and is particularly concerned that he rarely gets followup calls to information he puts in his monthly reports. I plan to bring this up for discussion at next week's branch chief meeting.

Gilray's only major concern was the prolonged time it takes us to issue a QA observation audit report. HLPD has been working on resolving this problem.

ORIGINAL SIGNED BY

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

Enclosure: As stated

cc: B. J. Youngblood

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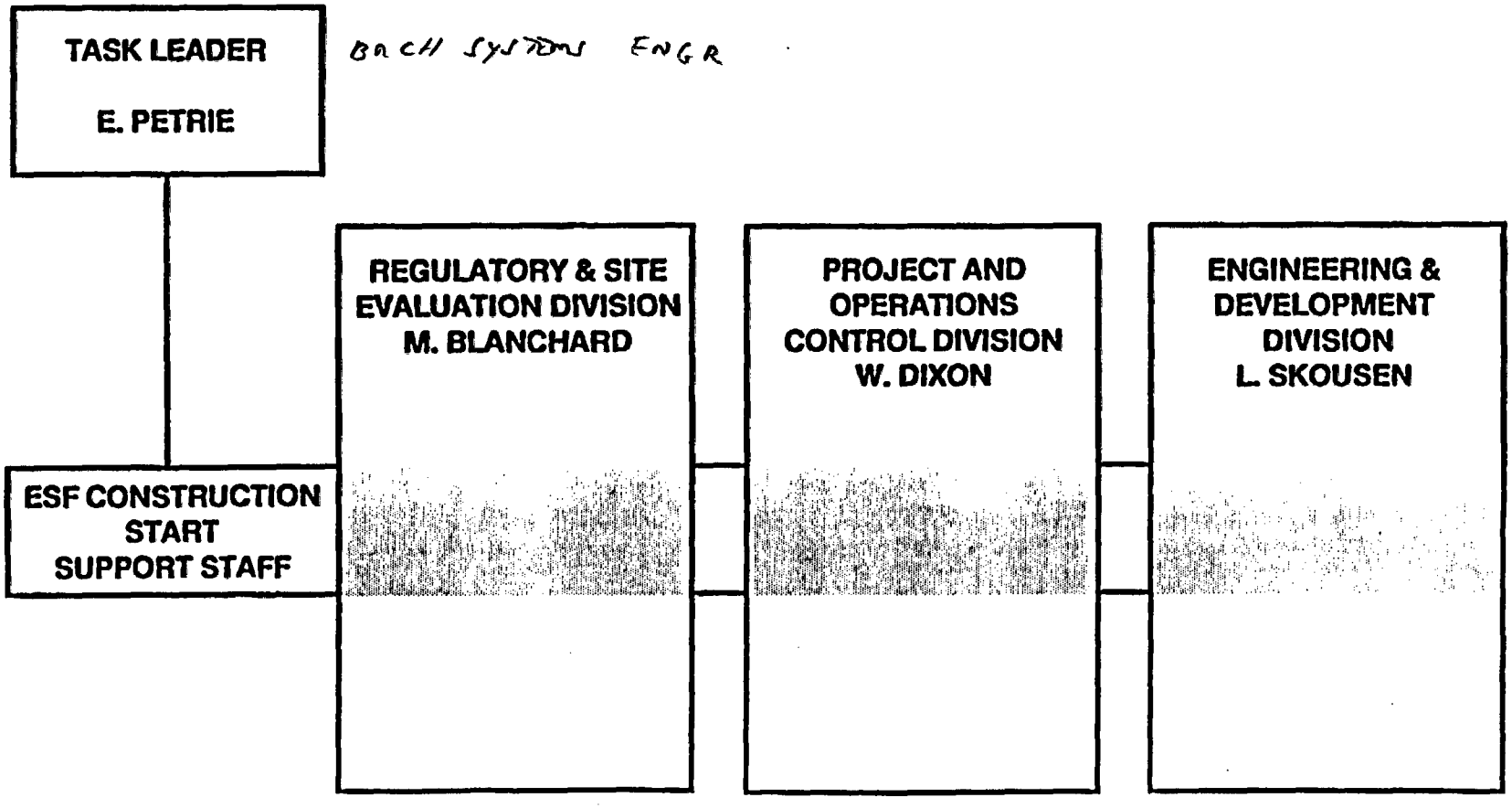
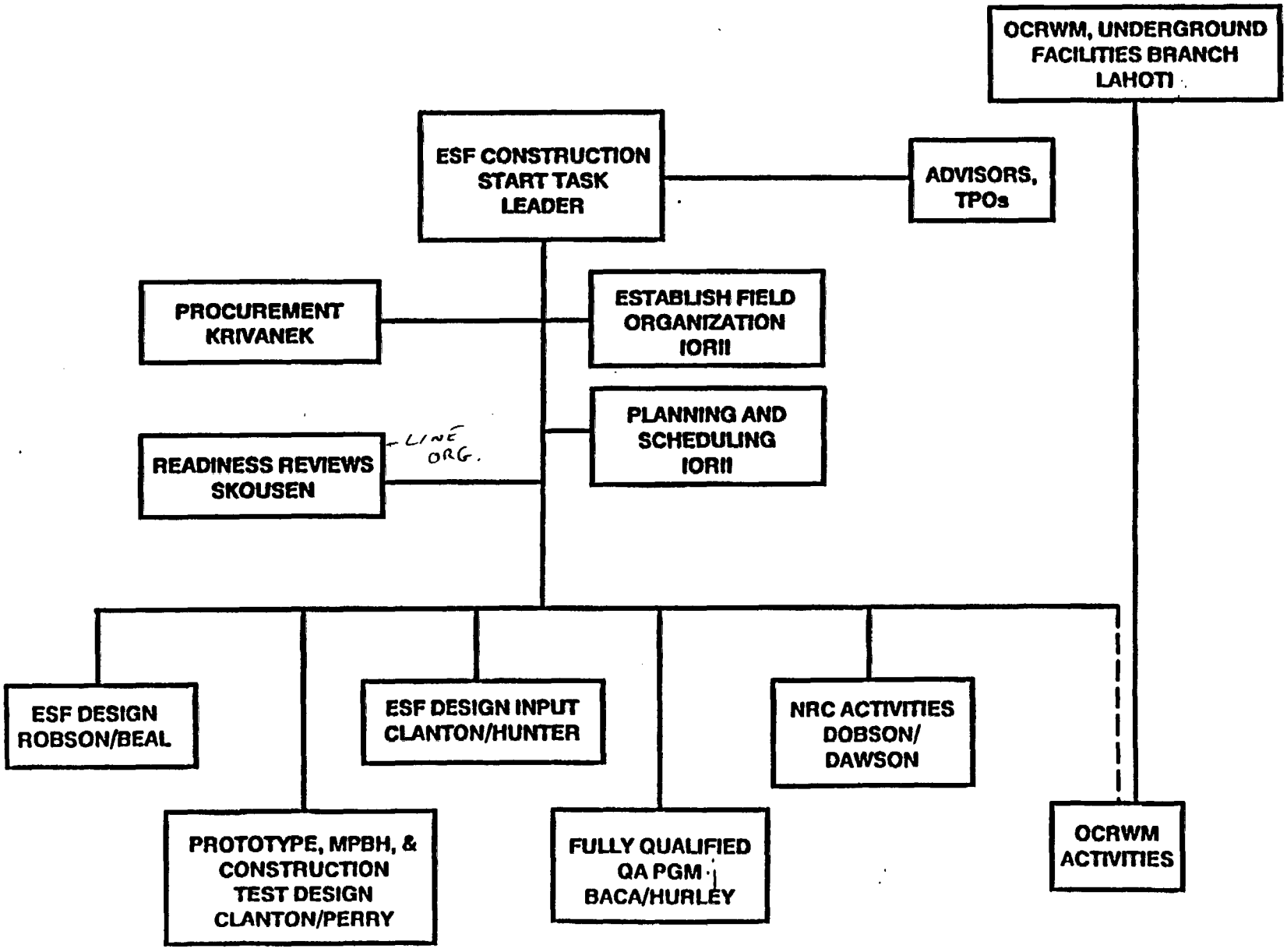
MATRIX ORGANIZATION WITHIN PROJECT OFFICE



ENCLOSURE

MANAGEMENT CENTERS



MANAGEMENT CENTER RESPONSIBILITY

- MANAGE CENTER'S WORK
- MAINTAIN KNOWLEDGE OF WORK
- PROVIDE STATUS
- RECOGNIZE AND REPORT PROBLEM AREAS
- KEEP PROJECT LOGIC NETWORK UP-TO-DATE

REPORTING

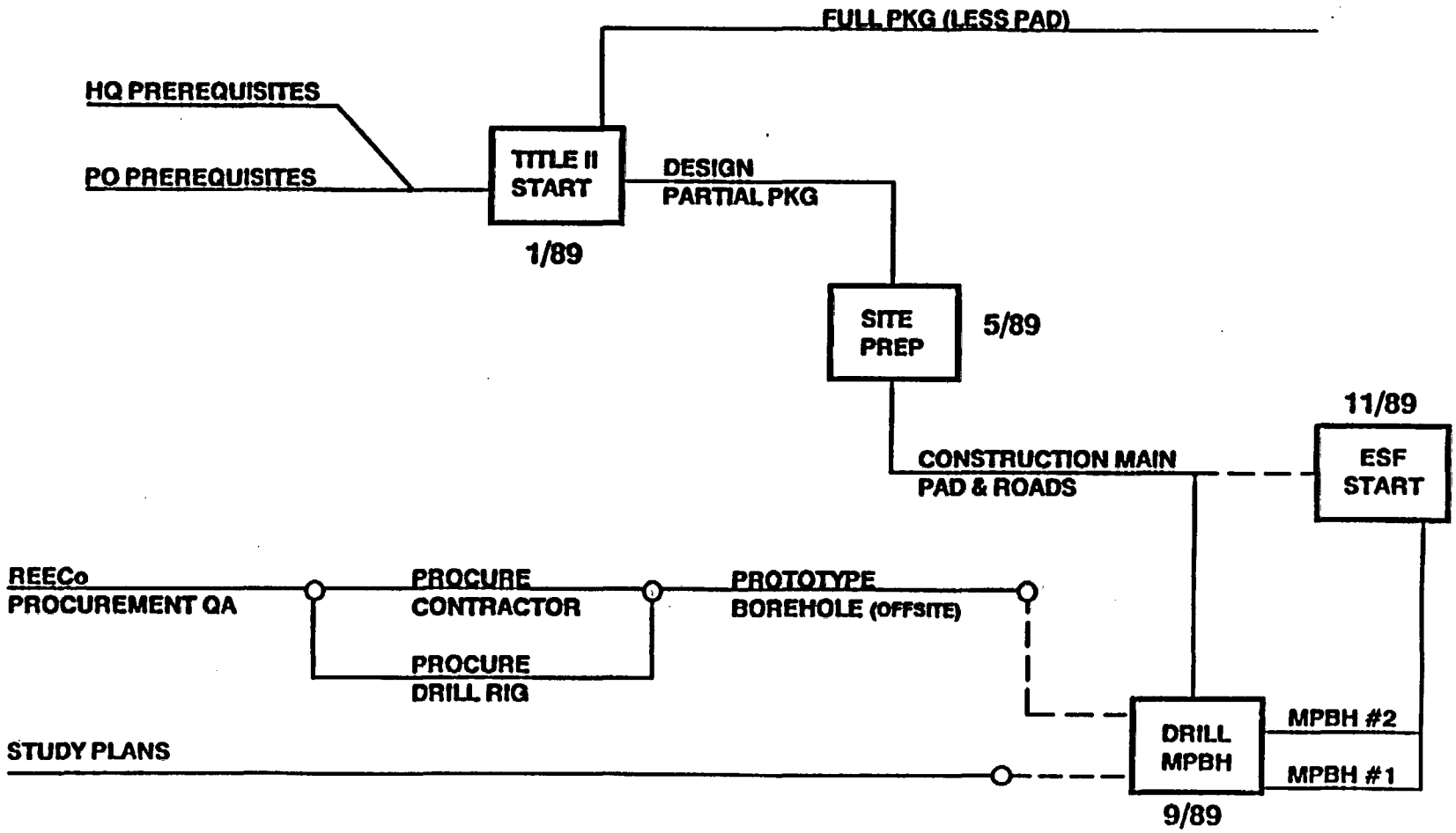
WITHIN PROJECT OFFICE

- VERBAL/STATUS REPORTS AT LEAST WEEKLY WITH TASK LEADER
- WRITTEN REPORTS TO TASK LEADER-WEEKLY
- STATUS OF LOGIC-WEEKLY
- UPDATE MANAGER'S NOTEBOOK-WEEKLY

WITH OCRWM

- UPDATE SUMMARY, MANAGER'S NOTEBOOK-WEEKLY
- VERBAL REPORTS AT LEAST WEEKLY (AS REQUESTED) AS PER ORGANIZATION CHART EARLIER

LEVEL O NETWORK
ESF CONSTRUCTION START



JUST TO START TITLE II

January 13, 1989

ESF CONSTRUCTION START RESPONSIBILITIES/PROJECT ORGANIZATION REV 3

Manager Wilmot
1988
Task Leader Petrie, Deputy (Bahorick)
Special Assignments (Waddell)

1. ESF DESIGN - Robson, (Beall)
1.1 Title I Design Report, Draft, 6A40 - Beall
- Review and Approve Title I Report, T192
1.4 IDS Technical Assessment, 6C20 - Cottle
- Prepare for Comment Resolution, 6C50 - Cottle
- Resolve Comments, 6C60 - Cottle
*1.5 Title II Hoist Rehab Design, 6C05 - Beall
*1.6 Title II IDS Design Phase I, 6X05 - Waters, Kalia

2. PROTOTYPE, MPBH AND CONSTRUCTION TEST DESIGN - Clanton (Perry)
2.1 USGS Prepare Prototype Letter, 3N18 - Perry
2.2 YMP Review Criteria Letter, 3M54 - Perry
2.3 Develop Drilling Plan (Prototype) F&S, 3M56 - Garms
2.4 Review and Approval of Drilling Plan by YMP, 3M58 - Perry
2.5 DRI Archaeological and EG&G Biological Surveys, T073 - Ralphs
2.6 Site Preparation T073 - Perry
2.7 Prepare MPBH Study Plan, 3M76 - Perry
2.8 Prepare Test and Evaluation Plan, 3N42 - Perry
2.9 DOE Field Coordination Approval, 3M60 - Iorii
2.10 Review and Issuance of REECo Work Order, 3M60 - Iorii
2.11 Training (Prototype), T073 -
2.12 Drill Prototype, T073 -
2.13 DOE Field Coordination/Approval, MPBH, 3N44 -
2.14 USGS Prepare MPBH Letter, 3M86 -
2.15 PO Review MPBH Criteria Letter, 3N20 -

3. ESF DESIGN INPUTS, Clanton, Hunter, (Beall), Thies
3.1 PO Develop Methodology for Q-List and Activity List (NUREG-1318), 6A50
3.2 PO Develop Q-List and Activity List Procedure, 6A55
3.3 Responsible Participants Perform Analysis, 3R62 - Hunter, Merzer, Ward
(Perform Safety Basis Analysis, 3R62)
3.4 Start Q-List and Activity List, 3R63, Hunter, Merzer, Ward
- Complete Q-List and Activity List, 3R64
- Preparation of QALAs, 3R65
(Prepare Q-List and Activity List, 3R64)
3.5 Initial Review of Design Input, 6A83 - Hunter
3.6 Develop and Document Input Qualification Process, 6A83 - Hunter
3.7 ESF Test Requirements
3.8 SDRD, - Smith, Brooks
- Initial Revision to SDRD & QMP 06-03 Review, 6A58
- Finalize Performance Criteria for SDRD, 6A59
- Program & HQ Review, 6A60
- Complete QMP 02-08 Review, 6A61
- Incorporate Review Comments, 6A62
- PO SDRD Approval, 6A6

4.0 PROCUREMENT - Krivanek, (Devlin)
4.2 Provision of second Dual-Wall Rig, 3M72 - Fox
(Procurement of second Dual-Wall Rig, 3M72)
4.3 Lease Dirt and Moving Equipment, 6R10 - Fox
4.4 Prep. Procurement for REECo, 3M96 - Fox
4.5 REECo Procurement of Subcontractor, 3M60 - Fox
(REECo Procurement Process, 3M60)
4.7 Subcontractor Provide Rig #1, T073 - Fox
(Subcontractor Procurement, T073)

5. FIELD ORGANIZATION - Iorii, (Mudra)
5.X PO Develop Management Plans & Procedures for ESF Field Activities, 6A95 - Dixon
5.1 Develop FOC Concept Paper, 3R30
5.2 Develop Detail FOC Organization Chart, 3R33
5.3 Develop/Approve FOC Position Descriptions, 3R33 - Iorii
5.4 Staff FOC Positions, 3R34 - Dixon
5.5 Develop FOC Facility Requirements Document, 3R04 - Iorii
5.6 Locate FOC Facility, 3R06 - Iorii
5.7 Acquire FOC Facility, 3R08
5.8 Develop FOC Equipment Requirements Document, 3R12 - Iorii
5.9 Procure FOC Equipment, 3R16
5.10 Install FOC Equipment, 3R18
5.11 Test, Acceptance of FOC Equipment, 3R22
5.12 Prepare Plans for FOC, 3R42 - Iorii
5.13 Review & Approve FOC Plans, 3R44 - Iorii
5.14 Identify FOC Implementation Procedures, 3R46 - Iorii
5.15 Prepare FOC Procedures, 3R50 - Krivanek
5.16 Review & Approve FOC Procedures, 3R54 - Krivanek
5.17 Train Personnel on Procedures and Equipment, 3R36
5.18 FOC Personnel Certification, 3R38

6. FULLY QUALIFIED QA PROGRAM - Baca, (Hurley)
6.1 A/E Develop Revs to Design Control Procedures, 6A05 - Braun
6.2 Update PO Design Review Procedures, 6A07 - Standish
(PO Design Review Procedure, 6A07)
6.3 A/E Implement Revised Design Control Procedures, 6A07 - Braun
(A/E Implement Design Control Procedures, 6A07)
6.4 PO Develop Design Input Procedure, 6A15 - Hunter
6.5 Train Personnel (NUREG-1318), 3R60 - Hunter, Merzer, Ward
(PP's Train Personnel, 3R60)
6.6 Establish Records Management Process, 6A90 - Hatch
(Establish Records Management Plan, 6A90)
6.7 PO Issues Approved QAP 88-9, Rev 1, GA97 - Blaylock
6.7a Review 88-9 for Consistency, 6A64 -
(Review Participants QAPP's for Consistency with 88-9, Rev 2, 6A64)
6.8 Review & Revise Interface Control Procedures, 6A98 - Brake
6.9 Establish Configuration Control Process, 6A99 - Merkley
6.10 REECo Procurement Control & Personnel Qualifications, 6A80 - Fox
6.11a LANL Review EG&G Design Process, 6C25 - Kalia
6.11b Develop QAPPs (for EG&G - IDS Design), 6C55 - Kalia
6.12 REECo QA Training & Certification, 3N06 - Fox
6.13 Ongoing Development of REECo QA APs, 3N10 - Fox.

SERIES OF QA SURVEILLANCES FEB-JUNE

6.16 Closeout Title II. Readiness Assessment Review Activities, 6A91 - Braun.
- Closeout Remaining Readiness Assessment Activities, 6C15

6.17 Participants QA Program Required for the Title II Start, 6A67 - Baca
(Participants QA Program Required for the Title II Start, 6A97)

6.17a Develop Fully Qualified QA Program, 6C15 - Baca

6.18 Title I Design Control Process Report, 6A76

7. READINESS REVIEWS - Skousen/Morley, (Watson)

7.1 Management Review, (Project Status Review & Start Title II Design), T192.

7.2 Readiness Review for Site Preparation, M645

7.3 MPBH Readiness Review, 3M78

7.4 Readiness Review for Collar, M652

8. OCRWM ACTIVITIES, LaHoti, Petrie

8.1 HQ Revise Appendix E for 10 CRF 60 Flow Down, 6A20

8.2 HQ Approve Methodology for Q-List and Activities List, 6A50

8.3 HQ Reviews Study Plans
- HQ Reviews Study Plan (MPBH), 3N14
- NRC Review of Study Plan Tracer Tests of Infiltration, 9096
- Concurrent HQ/PO Review of Study Plan Structural Features, 9580
- Concurrent HQ/PO Review of Study Plan Excavations Investigations, 6B10.

(HQ Reviews MPBH Study Plan, 3N14)

8.4 NRC Study Plan Review Process, 3M78

8.5 HQ/PO Review & Approve Test & Evaluation Plan, 3N40

9. NRC ACTIVITIES - Dobson (Dawson), OCRWM

9.1 Prepare Agenda NRC Title I, 6A70 - Dawson
(Prepare Agenda NRC Title I Concerns, 6A70)

9.2 Prepare Materials NRC Title I, 6A72 - Dawson
(Prepare Materials NRC Title I Concerns, 6A72)

9.3 Final Prep. NRC Meeting, 6A74 - Dawson

9.4 Tech Assess DAA (Design Acceptability Analysis) 6A76 - Dawson
(Closure of Title I NRC Concerns, 6A76)

9.5 Prepare & Submit Study Plans to HQ