

KH/DRAFT POL & PRO LTR 1-22

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JUN 21 1990

MEMORANDUM FOR: Jesse L. Funches, Director
Program Management, Policy Development
and Analysis Staff, NMSS

FROM: Robert E. Browning, Director
Division of High-Level Waste Management, NMSS

SUBJECT: DRAFT NMSS POLICY AND PROCEDURES LETTER 1-22, REVISION 2
FOR QUALITY ASSURANCE (QA) PROGRAM

The draft Revision 2 of NMSS Policy and Procedures Letter 1-22, transmitted by your memorandum dated June 8, 1990, has been reviewed by the Division of High-Level Waste Management. We note that the changes from Revision 1 appear to add explicit requirements for program implementation, maintenance and periodic reviews of program implementation, but do not significantly change the requirements for control of technical work.

Our specific comments on Revision 2 are as follows:

1. The Purpose (Section A) should discuss the relationship between NMSS 1-22 and the Internal Control System mandated by R. Bernero's memorandum dated January 9, 1989.
2. Documentation of training on the QA procedures and instructions for the control of technical work (Section B) should be explicitly required.
3. Documentation of the technical training needed, and the accomplishment of this training (Section C.1) should be explicitly required.
4. "Significant changes" should be defined (Section C.2).
5. Documentation of re-review after significant changes (Section C.2) should be explicitly required.
6. Section C.2 should state that documentation of independent checking will be by concurrence on the document or transmitted letter, unless otherwise specified.

Although some of these comments require a level of detail which could be relegated to Division level implementing procedures, their inclusion in NMSS 1-22 will provide uniformity in practice throughout NMSS.

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As a final thought, you might consider whether PMDA should develop a single QA requirements manual for NMSS, which would transition between NMSS 1-22 and Division implementing procedures. This might be more efficient than having each Division develop its own manual.

Please contact Ken Hooks (X-20447) of my staff if you have any questions regarding this memorandum.

ORIGINAL SIGNED BY

Robert E. Browning, Director
Division of High-Level Waste Management, NMSS

cc: R. Bangart
R. Burnett
R. Cunningham

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