

memorandum

HQO.871027.0085

DATE:

OCT 26 1987

REPLY TO RW-24
ATTN OF:

SUBJECT: HQ/OGR QA Review of ANSI/ASME NQA-3, Draft 3

TO: M.E. Langston, RW-40

HQ/OGR QA have completed the review of ANSI/ASME NQA-3 (Draft 3, dated August 1987). Comments are provided on Attachment "A".

This review was performed to assess whether this Standard provides for the supplementary QA requirements associated with the collection of information for site characterization, as required by various program requirements documents, that are not provided for in NQA-1. We conclude that these requirements are covered, however, we offer the attached comments for your consideration.



Karl G. Sommer
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Siting, Licensing & QA Division

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Comments on ANSI/ASME
NQA-3, Draft 3, August 1987

1. Reference page 4, Section 2. We suggest limiting the applicability of this document to activities which could affect the quality of scientific and technical information required to support licensing.
2. The term "Readiness Review" is referenced in the Introduction Section and the Quality Assurance Program Section, however, the term is not defined in this Standard's Supplement-SW-1, glossary. We suggest the following definition; "a systematic, documented review of the readiness for startup and/or continued extended use of a facility, process or activity. Readiness reviews are typically conducted before proceeding beyond project milestones and prior to initiation of major work activities or events." This is the definition contained in the draft QAMPR (DOE/RW-0032) that is currently under revision.
3. Reference page 7, Section (b)(1). We suggest that the first sentence in this section be revised as follows: "Quality affecting site characterization activities...", since there are numerous other activities referenced in NQA-1 Supplement 2S-4 (which is applicable) that are also associated with licensing, such as; erecting, installing, maintaining, etc. This standard is limited to Site Characterization. Also, if this list is not all-inclusive, we suggest a revision to state this.
4. Reference page 18. We suggest that a definition be provided for the term "archival sample."
5. Reference page 18, Section (a)(1), Sample Identification. The NRC Review Plan, June 1984 criterion 8.2 allows that sample identification may be maintained on records traceable to the sample if not on the sample or sample container. We suggest that this provision be included in this section to avoid a conflict between requirements documents.
6. Reference page 23, "Handling, Storage, Transport, and Shipping of Samples." It is understood that these additions and amplifications to NQA-1 Requirement 13 are to provide for sample handling, storage, etc. However, we suggest deleting "OF SAMPLES" from the title of this section, it is too restrictive. Since it is referenced that the provisions of NQA-1 Requirement 13 shall apply; the shipping etc., of items and components associated with site characterization activities apply as well as these added provisions for samples.
7. Reference page 27, Section (c). We believe that for recurring quality problems where corrective actions have apparently not been effective that management has the responsibility to consider stopping work associated with the applicable activity. We suggest adding this provision.

8. Reference page 28, Section (c)(1). The DOE HQ-OGR is currently re-evaluating the necessity for the category of "Post-Closure Records" being defined at this time, i.e., site characterization of the three candidate sites. We recommend that until site selection, QA records classification be limited to lifetime and nonpermanent.
9. Reference page 28, Section (c)(2). Since there may be numerous applications for license amendments filed throughout the course of this program, we suggest that this section be revised to clarify that the "amendment of the repository license" as referenced here, is the license amendment for permanent closure.
10. Reference page 34, Section (9). The first and last sentence of this section appear to be conflicting. The first indicates that the section deals with the qualification of data which were not collected under a quality assurance program. However, the last sentence indicates that an acceptable qualification method of this data is the demonstration that the data were collected under a quality assurance program. We suggest revising the last sentence of this section to read "..., and demonstration that the data were collected under circumstances equivalent to the requirements of a quality assurance program as described in this standard."
11. Reference page 42, Section (a). See comment #9.

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