

United States Government

Department of Energy

memorandum

HQO.870928.0055

DATE: SEP 23 1987
REPLY TO
ATTN OF: RW-24
SUBJECT: DOE QA Program Status

TO: Jeff Neff, SRPO-CHO
Carl Gertz, WMPO-NV
John Anttonen, AMC-RLO
Sally Mann, RTTD-CHO

The attached DOE letter to the NRC identifies the status of DOE's response to several recent NRC letters, which provided comments and requests for additional information on Headquarters and Project Office QA Program Documents. The scheduled dates of the identified DOE actions in the attached letter were coordinated with the respective Project Office QA groups. In order to meet the scheduled dates for DOE submittals to the NRC, it is essential that the Project Office(s) submit the proposed NRC comment dispositions and additional information to Headquarters on the schedule identified in Attachment 1.

The attached letter also clarified a previous DOE commitment to the NRC to have a fully qualified QA Program in-place prior to submittal of the SCPs. In order to meet the associated DOE commitment in the attached letter to identify and schedule the QA Program development and verification activities, it is requested that a plan and schedule be submitted to Headquarters by November 30, 1987, which identifies the following:

- 1) The identification of, and schedule for, on-going and near-term (thru 12/31/88) site characterization and related activities which require the development and implementation of a QA Program.
- 2) The applicable contractors (if known) and the required QA Program submittal dates to DOE for approval, required to support the activities identified in 1) above.
- 3) The scheduled dates for DOE Project Office approval of the contractor QA Program(s) required to support the activities identified in 1) above.
- 4) The scheduled date for DOE Project Office submittal to DOE-OGR for transmittal to the NRC of the QA Programs identified in 2) above, for NRC review.

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- 5) The schedule for DOE audits of the QA Program(s) identified in 2) above, to verify QA Program implementation.
- 6) The schedule for DOE notification to the NRC of the readiness of the QA Programs identified in 2) above, for NRC mini-audit.



for James P. Knight, Director
Siting, Licensing and
Quality Assurance Division



Department of Energy
Washington, DC 20585

SEP 18 1987

Mr. B. J. Youngblood, Chief
Operation Branch
Division of High-Level Waste Management
Office of Nuclear Material Safety and
Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

This letter is in response to your letter dated 7/10/87, which requested the status of several recent NRC letters to DOE providing comments and requests for additional information (RAI) on DOE Headquarters and Project Office QA Plans for high-level radioactive waste repositories. Your letter also recommended that meetings be scheduled between DOE Headquarters, the DOE Project Office(s), DOE contractors and NRC staff to develop an understanding of the NRC comments and RAIs and thereby expedite the means for the comment resolution process for the QA Plan issues.

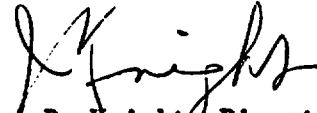
The status of DOE's response(s) to the NRC comments and requests for additional information (RAI) referenced in your letter is shown in Attachment #1. DOE concurs that the recommended NRC/DOE meeting(s) would be beneficial in developing a mutual understanding, which would serve to expedite the comment resolution process. The schedule for the NRC/DOE comment resolution meetings will be determined on a case by case basis.

In a letter from W. Purcell (DOE) to R. Browning (NRC) dated September 3, 1985 DOE stated its intention to have a fully qualified QA program in place prior to submittal of the Site Characterization Plans. It was understood by the DOE and NRC Staffs at the time that fully qualified pertained to those activities that would result in collection of data and/or designs (hardware) that make up the licensing record. This understanding was based on the evolving nature of the repository program. Specifically, as the repository program evolves it becomes evident that there are many aspects of an overall QA program that are neither necessary nor prudent to develop fully until the time of application is closer at hand. Factors such as the extended time period over which site characterization will be performed, the sequential nature of many site characterization activities, and the evaluation of the NRC/DOE interface, e.g., recent NRC notice of its intention to review and audit DOE prime contractor QA programs, make it clear that the DOE QA program will continue to develop over the next several years.

In order to assure that adequate QA provisions are in place for all site characterization activities, DOE will identify (1) those portions of the QA Program required to support near-term site characterization activities, (2) the activities required to establish and qualify those portions of the QA Program, and (3) the schedule for completion of those activities, commensurate with the schedule for site characterization activities. The initial plan and schedule will address near-term Program activities and will be updated, periodically, to address subsequent Program activities.

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This planned and scheduled approach to satisfying the commitment will allow both DOE and NRC to (1) monitor the progress of QA Program development and implementation, (2) assure that QA Program development and qualification activities are scheduled and completed consistent with their need, and (3) schedule/allocate the necessary resources to complete the required activities.



James P. Knight, Director
Siting, Licensing & QA Division
Office of Geologic Repositories
Office of Civilian Radioactive
Waste Management

Attachment #1

Status of DOE Response to NRC Comments and Requests
for Additional Information on Headquarter's
and Project Office QA Programs

<u>QA Plan</u>	<u>Title</u>	<u>Scheduled Date of DOE Comment Disposition Submittal to the NRC</u>	<u>Scheduled Date of DOE/NRC Comment Resolution Meeting</u>	<u>Scheduled Date of DOE Submittal of Revised QA Document(s) to the NRC</u>
OGR/B-3 (8/86)	Quality Assurance Plan for High-Level Radio- active Waste Repositories	Complete	Complete	1/31/88
BQARD (Rev. 0 1/86)	Basalt Quality Assurance Requirements Document	Complete	Complete	Complete
BWIP/QAP (Rev. 1, 4/15/86)	Basalt Waste Isolation Project-Quality Assurance Plan	Complete	Complete	Complete
NVO-196-17 (1/14/86)	Nevada Nuclear Waste Storage Investigations-QA Plan	11/30/87	TBD	1/22/88
NNWSI-SOP- 02-01 (1/31/86)	Nevada Nuclear Waste Storage Investigations Project Quality Assurance Program Plan Requirements for Participating Organi- zations and NTS Support Contractors	11/30/87	TBD	1/22/88
SRPO QA Rev. 0 (12/4/85)	Quality Assurance Plan- Salt Repository Project Office	10/30/87	TBD	12/31/87

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