

memorandum

HQO.880210.0011

DATE: FEB 08 1988
REPLY TO RW-24
ATTN OF:

SUBJECT: HQ/OGR QA Review of the BNL PRAM QA Plan

to: Don Alexander, RW-232

The HQ/OGR staff has reviewed the documents identified in Attachment 1 which constitute the QA Plan for the Brookhaven National Laboratory's (BNL) Preclosure Risk Assessment Methodology Program (PRAM).

The BNL PRAM Staff should be commended for their cooperation and their efforts in complying with the HQ/OGR QA requirements.

The HQ/OGR QA staff recommends that the PRAM QA Plan be "approved with comments". The attached comments (Attachment 2) are required to be addressed in order to comply with QA requirements or for clarification. BNL should be requested to incorporate these comments and to submit the revised QA Plan for HQ/OGR approval. Any questions concerning this review should be referred to Karl Sommer of my staff.

Ralph Stein
Ralph Stein, Acting Director
Siting, Licensing & Quality
Assurance Division
Office of Civilian Radioactive
Waste Management

Attachment

88116909
WM Project: WM-1
PDR w/encl
(Return to WM, 623-55)

WM Record File: 405
LPDR w/encl

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Attachment 1Brookhaven National LaboratoryPreclosure Risk Assessment MethodologyQuality Assurance Plan

Quality Assurance Program, Revision 1, dated 12/23/87

Quality Assurance Procedures.

<u>Number</u>	<u>Title</u>	<u>Revision</u>	<u>Date</u>
PRAM-100	Procurement of Seller Services	1	1/31/88
PRAM-101	Personnel Qualification & Training	1	1/31/88
PRAM-102	Treatment of Data	1	1/31/88
PRAM-103	Quality Assurance Records Control	1	1/31/88
PRAM-104	Quality Assurance Audits	1	1/31/88
PRAM-105	Technical Reviews	1	1/31/88
PRAM-106	Peer Reviews	1	1/31/88
PRAM-107	Auditor Training and Qualification	1	1/31/88
PRAM-108	Quality Assurance Program Assessment	1	1/31/88
PRAM-109	Assignment of Quality Assurance Levels	1	1/31/88

COMMENTS ON THE BROOKHAVEN NATIONAL LABORATORY

PRECLOSURE RICK ASSESSMENT METHODOLOGY

QUALITY ASSURANCE PLAN

1. Requirement

The NRC Review Plan, Section 1.12.d, requires that persons performing QA functions have direct access to management levels which will assure the ability to stop unsatisfactory work.

Comment

There should be provisions for the PRAM Designated QA Representative (DQAR) to have direct access to PRAM management to assure the ability to stop, or cause to be stopped, unsatisfactory work.

2. Requirement

The NRC Review Plan, Section 1.13, requires that provisions be established for the resolution of disputes involving quality.

Comment

There is no provision for the resolution of disputes involving quality arising from a difference of opinion between QA personnel and other department personnel.

3. Requirement

The NRC Review Plan, Section 5.1, requires that organizational responsibilities be described for assuring that quality-related activities are specified in instructions and procedures.

Comment

Section 3.3, QA Procedures, should be in more detail to identify the procedures that are developed. In addition, Forms 4.4a, 5 and 5a should be incorporated into a PRAM QA Procedure.

4. Requirement

The NRC Review Plan, Section 6.4, requires that procedures be established to assure that obsolete documents are removed and replaced by applicable revision.

It is suggested that a method for acknowledging receipt of controlled documents be included in a Document Control QA Procedure.

5. Requirement

The NRC Review Plan, Section 17.2, requires that the QA and other organizations be identified and their responsibilities described.

Comment

Neither the QA Plan nor the PRAM QA Procedure 103, QA Records Control, identify the method to (1) govern access to and control of the QA record files; (2) maintain control of and accountability for records removed from the records facility; and (3) provide for filing supplemental information.

6. Requirement

The NRC Review Plan, Section 17.4, requires that suitable facilities for the storage of QA records be described.

Comment

It is not indicated that the dual record facilities are sufficiently remote from each other to eliminate the chance of exposure to a simultaneous hazard.

7. Editorial Comment

Some of the text in the first sentence of Section 7.1 has been omitted.

8. Requirement

The NRC Review Plan, Section 2.8, requires that a indoctrination program be established.

Comment

PRAM QA Procedure 101, Personnel Qualification and Training, should address the methods and responsibilities for providing indoctrination concerning the requirements of quality assurance.

9. Requirement

PRAM QA Plan, Section 6.0 Corrective Actions, indicates that the PRAM Principal Investigator is responsible for implementing corrective actions.

Comment

Paragraph 3.6 of PRAM QA Procedure 104, QA Audits, should include the PFI's responsibility for implementation of the Corrective Action in addition to determination of the cause of the nonconformance.

10. Requirement

PRAM QA Plan, Section 4.0, Document Control, Paragraph 4.2, requires that quality related documents be reviewed and approved by PRAM management.

Comment

There is a sign-off block on each PRAM QA Procedure for "Approved by". PRAM management should indicate approval of the procedures by signing these blocks.

WM Record File

405

WM Project 1

Docket No. _____

PDR

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(Return to W.M., 623-SS)

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