



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 24 1988

Mr. Charles E. Kay, Acting Director
Office of Civilian Radioactive Waste Mgt.
U. S. Department of Energy RW-20
Washington, D. C. 20585

Dear Mr. Kay:

As you are aware, one of the key NRC concerns on DOE's Consultation Draft Site Characterization Plan reiterated a long standing DOE commitment that a qualified quality assurance program should be in place before beginning site characterization. Our staffs have been working to identify and agree upon actions required to resolve this NRC staff comment.

In a June 8, 1988 meeting (attachment 1), NRC staff identified steps considered necessary for NRC to independently confirm that DOE's program is qualified. These steps include:

1. NRC review and acceptance of approximately twelve quality assurance plans developed by DOE Headquarters, the DOE Nevada Project Office and DOE contractors. NRC's review would be after DOE Headquarter's own review of these plans to ensure they meet regulatory requirements and good quality assurance practices. NRC review of each plan was estimated to take one month, provided the plans were of high quality and submitted on a phased basis;
2. NRC's observation of audits conducted by DOE to ensure each organization plan is being implemented properly; and
3. iterations of the above two steps until DOE Headquarters considers each organization's plan is acceptable and is being implemented properly and NRC concurs.

An NRC developed schedule was used by NRC staff to help illustrate the planning factors for NRC involvement which DOE needs to consider in developing its own plan for reaching the goal of a qualified and NRC accepted quality assurance program. The plan indicated this could, under best case conditions, be accomplished by mid 1989. However, as noted in the enclosed meeting minutes, some key initial steps, such as the submittal of quality assurance plans have already slipped and I am concerned that our mutual goal of having a qualified quality assurance program in place is not consistent with DOE's current schedules for beginning site characterization. It is my understanding that DOE's own prioritized plan and schedule will be available at the July 7, 1988 meeting of our staffs for consideration and, if possible, endorsement by both NRC and DOE management as the baseline plan. We both need this baseline plan so we can monitor our staffs' progress in resolving the quality assurance program concern and ensure schedule pressure to begin site characterization does not compromise either your efforts to put a qualified program in place or our efforts to independently confirm that this has been done.

If there are any items which our staffs have been unable to resolve during the July 7, 1988 meeting, I suggest that you and I meet promptly to resolve them. In this regard I will be available July 8 or 9, 1988.

JUN 24 1988

Mr. Charles E. Kay

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Your April, 1988 reorganization of the Office of Civilian Radioactive Waste Management (OCRWM) established a new, separate Office of Quality Assurance reporting directly to the Director, OCRWM. This action satisfactorily resolves a key open NRC comment on DOE's quality assurance program. As noted in your letter of June 14, 1988, there is an urgent need to select a permanent director who can be personally involved in the establishment of your qualified quality assurance program. I agree and appreciate your offer to inform me when the permanent director is selected.

Sincerely,

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Hugh L. Thompson, Jr., Director
Office of Nuclear Material Safety
and Safeguards

Enclosures: As stated

cc: R. Loux, State of Nevada

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Central File	P. Prestholt	J. Linehan
PDR	R. E. Browning	R. Ballard
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CNWRA	NMSS R/F	J. Holonich
LSS	J. Kennedy	H. Thompson, Jr.
		Directors r/f

OFC :HLOB	:HLWM	:HLWM	:NMSS	:
NAME:JL	:Youngblood	:Browning	:HThompson	:
DATE:06/27/88	:06/24/88	:06/24/88	:06/24/88	:

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UNITED STATES
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JUN 14 1988

MEMORANDUM FOR: B. J. Youngblood, Chief
Operations Branch
Division of High-Level Waste Management

FROM: James E. Kennedy, Section Leader
Quality Assurance Section
Operations Branch
Division of High-Level Waste Management

SUBJECT: MINUTES OF MANAGEMENT MEETING WITH DEPARTMENT OF
ENERGY ON JUNE 8, 1988

NRC HLWM and DOE OCRWM staff met at 4:00 p.m. on June 8, 1988 in OWFN to discuss schedules and milestones for DOE to qualify the repository QA program and for the NRC to review DOE QA plans/procedures and audits associated with qualifying their program. A schedule for a meeting on QA open items was also discussed. The following persons attended the meeting:

<u>NRC</u>	<u>DOE</u>
R. Browning	R. Stein
B. J. Youngblood	B. Kehew
J. Kennedy	J. Blaylock (NNWSI)
J. Linehan	E. Regnier
K. Stablein	G. Appel
	G. Faust (Weston)

The NRC staff presented a strawman it independently prepared of the actions it needs to take in order to accept the DOE QA program and resolve the QA objection on the CDSCP. The chart depicting these actions and schedules is attached, along with a handout describing the general assumptions used in preparing the strawman.

The staff noted that two of the first milestones were missed by DOE, viz. submittal of the WMPO 88-9 QA plan, which was 6 weeks late, and the meeting to discuss open items, which is currently two months behind the original schedule. If DOE QA milestones continue to be slipped, any new site studies, as well as the shaft construction schedule may be impacted. The staff emphasized that its review actions need to be distributed over the next year and cannot be compressed into the last few months before DOE's start of new site programs.

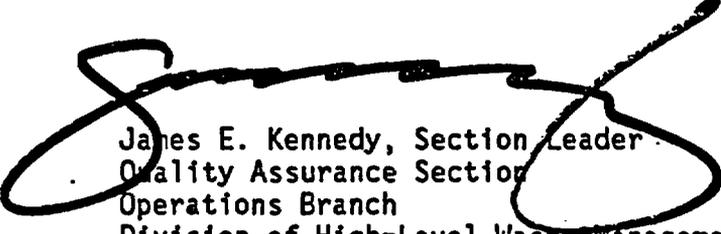
The staff also emphasized that it needs firm schedules from DOE on the actions it needs to take in the attached chart. Particularly important for the near term are the submittal of QA plans for DOE contractors.

DOE and NRC staff agreed to meet July 7, 1988 to discuss QA open items and DOE plans for qualifying its QA program. DOE is to furnish a list of open items for that meeting by June 17, 1988.

B. J. Youngblood, Chief

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DOE discussed the strategy it is developing for qualifying its program and NRC involvement in that process. The DOE strategy appeared generally compatible with the staff's process with the notable exception that DOE's schedule slippage may severely impact the timely completion of reviews and approvals. This strategy will be discussed in greater detail in the July 7, 1988 meeting.



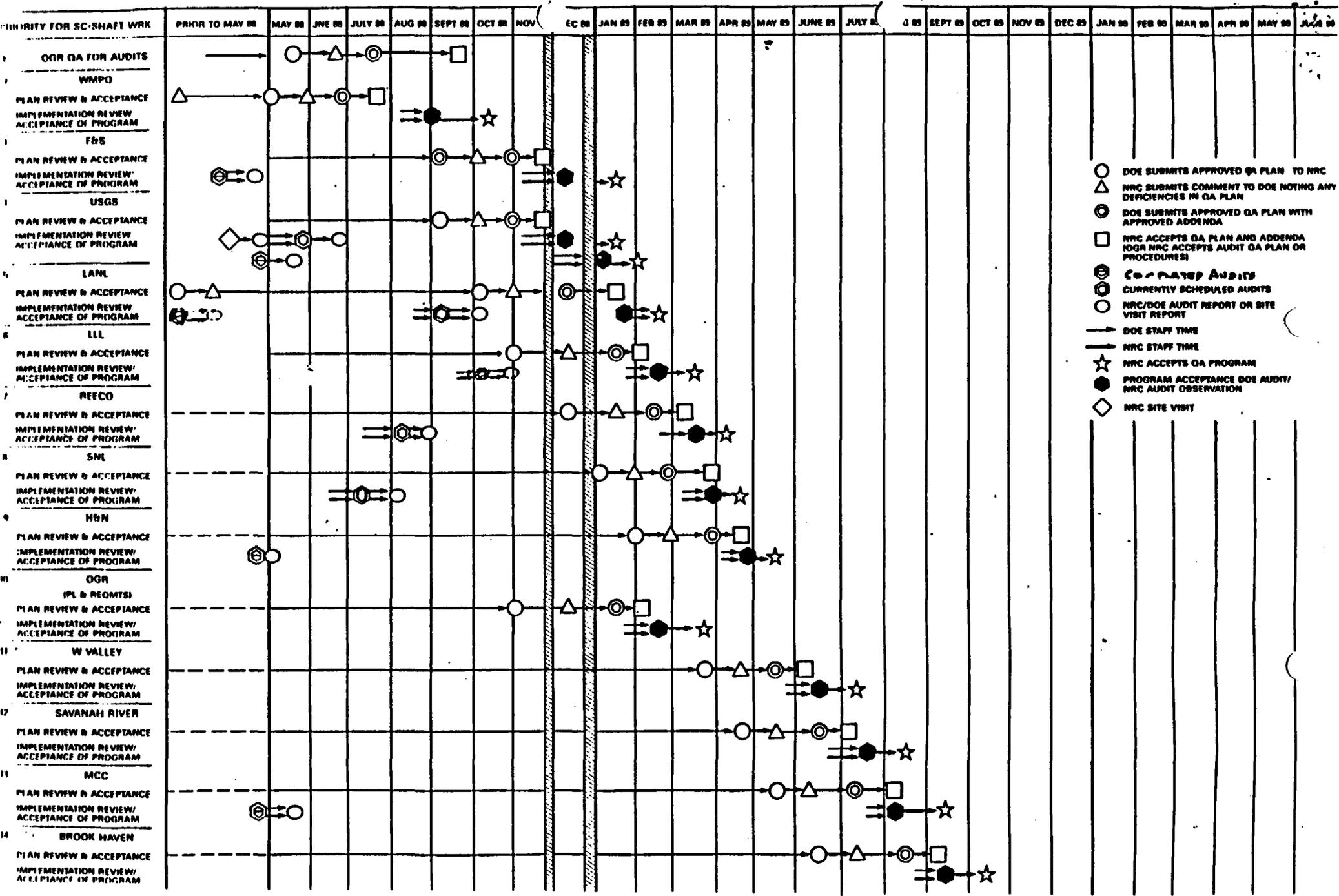
James E. Kennedy, Section Leader
Quality Assurance Section
Operations Branch
Division of High-Level Waste Management

Enclosures: As stated

BASIC ASSUMPTIONS IN STRATEGY

- o DOE HAS PRIMARY RESPONSIBILITY FOR ASSURING QA PROGRAM IS QUALIFIED
- o SHAFT AND SITE STUDIES ARE GIVEN HIGHEST PRIORITY
- o OBSERVATION AUDITS ARE PRIMARY MEANS OF ASSESSING PROGRAM IMPLEMENTATION
- o IN GENERAL, TWO OBSERVATION AUDITS NEEDED TO ACCEPT A PROGRAM, ASSUMING NO MAJOR PROBLEMS

SCHEDULE FOR NRC ACCEPTANCE OF QA PROGRAMS



- DOE SUBMITS APPROVED QA PLAN TO NRC
- △ NRC SUBMITS COMMENT TO DOE NOTING ANY DEFICIENCIES IN QA PLAN
- ⊙ DOE SUBMITS APPROVED QA PLAN WITH APPROVED ADDENDA
- NRC ACCEPTS QA PLAN AND ADDENDA (OGR NRC ACCEPTS AUDIT QA PLAN OR PROCEDURES)
- ◇ CURRENTLY SCHEDULED AUDITS
- CURRENTLY SCHEDULED AUDITS
- NRC/DOE AUDIT REPORT ON SITE VISIT REPORT
- DOE STAFF TIME
- NRC STAFF TIME
- ☆ NRC ACCEPTS QA PROGRAM
- PROGRAM ACCEPTANCE (DOE AUDIT/ NRC AUDIT OBSERVATION)
- ◇ NRC SITE VISIT