

405/JK/87/01/13

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MEMORANDUM FOR: John J. Linehan, Acting Chief  
Repository Projects Branch, DWM

FROM: James E. Kennedy, Section Leader  
Repository Projects Branch, DWM

SUBJECT: SUMMARY OF MEETING WITH EEI TASK GROUP ON HLW REPOSITORY

The purpose of this memorandum is to document the results of a meeting with the EEI task group on the high-level waste repository program December 17, 1986 from 4:00 - 6:00 p.m. The purpose of the meeting, requested by EEI, was for the NRC staff to present its views on the status of the DOE QA program for the high-level waste repository. The following points, all of which had previously been brought to DOE's attention, were made:

1. DOE progress in reaching the objective of having a fully qualified QA program in place by site characterization is slow. Most issues identified by the NRC staff over the last two years continue to remain unresolved.
2. The size and qualifications of the DOE QA staff remain a concern. There has been little progress in improving this situation since it was first identified by NRC two years ago. Project offices are making greater use of contractors as extensions of staff, however, and this may be a workable approach. DOE HQ also utilizes contractors but to a much smaller degree.
3. Independence of the QA function in DOE HQ is still a concern and a licensing issue which needs to be resolved soon. This was first identified two years ago as an issue but is still unresolved. The QA manager is relegated to lowest management level of HQ organization.
4. DOE audits have generally not focused sufficiently on effectiveness of QA programs as measured by the quality of the technical work produced. Staff is generally concerned about the lack of mechanisms for DOE oversight of the technical work being performed by contractors.
5. The staff has identified as another concern the interface between OCRWM and the field offices/project offices. The lack of direct control which can be exercised by OCRWM over the repository project offices could make achievement of program quality assurance and technical goals more difficult. NRC staff briefed the DOE HQ staff on this concern in a management meeting on June 5, 1986 and specifics are documented in the minutes for that meeting. It was noted by the staff that this issue is not embodied in the regulations and that the staff could not make a finding that an internal reorganization is necessary. Nevertheless, based on lessons learned from the reactor

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program for consideration and appropriate action the staff has brought it to DOE's attention.

The EEI task group agreed with the points raised by staff. Most had been independently raised by them already. Members of the task group, however, felt that the QA organization in the project offices should not report to the project manager based on their experience with nuclear power plants. The staff indicated that the existing organizational independence in the project offices for the QA function would probably meet the QA requirements.

*Original Signed By.*

James E. Kennedy, Section Leader  
Repository Projects Branch, DWM

OFFICIAL CONCURRENCE AND DISTRIBUTION RECORD

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CONCURRENCES

ORGANIZATION/CONCUREE	INITIALS	DATE CONCURRED
WM/RP JKennedy		87131 6

*Rec'd & marked  
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