

memorandum

WM DOCKET CONTROL CENTER

DATE: APR 28 1986

REPLY TO
ATTN OF: RW-24

SUBJECT: Schedule for NRC Audits of Projects

TO: Jeff Neff, SRPO-CH
Don Vieth, WMPO-NV
Lee Olson, BWIP-RL

WM Record File

WM Project 10, 11, 16

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Docket No.

PDR

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Bilhorn *DEM*
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As you know, all of our first repository projects will have a fully qualified QA program in place prior to the initiation of formal site characterization activities, e.g., the excavation of the exploratory shafts. We have also committed to NRC that we will be ready for NRC to audit our projects (and their contractors/participating organizations) prior to the issuance of the Site Characterization Plan (SCP) for each project.

At the last Quality Assurance Coordinating Meeting, which was held January 28-30, 1986 in Denver, the QA managers from each project and from OGR identified the key activities that need to be completed, and a schedule for accomplishing them, in order for the NRC audits to take place as promised. Many of these activities are the responsibility of the projects. Subsequent deliberations and discussions with project representatives have resulted in the attached master action plan for QA activities from now until the SCP issuance date. The key project activities and the schedule for them are:

		BWIP	WMPO	SRPO
P.O.	QA Plans to OGR for Review	04-15-86	07-31-86	02-15-86
OGR	Comments to Projects Offices	04-29-86	08-14-86	04-22-86
P.O.	Issues Final QA Plans	06-02-86	09-12-86	06-20-86
P.O.	QA Procedures to OGR for Review	06-20-86	07-31-86	03-31-86
OGR	Comments to Project Offices	07-03-86	08-14-86	04-14-86
P.O.	Issues Final Procedures	08-01-86	09-12-86	06-20-86
OGR	Submits P.O. QA Plans/Procedures to NRC for Review	08-08-86	09-19-86	06-27-86
NRC	Comments Received	10-10-86	11-14-86	08-19-86
P.O.	QA Plans/Procedures Revised	11-14-86	12-19-86	09-24-86
OGR	Management Appraisal of Projects and Contractors	05-21-86	07-01-86	08-15-86
OGR	Follow-Up Audit of Projects	09-19-86	10-24-86	11-21-86
P.O.	Fully Implemented QA Programs	11-24-86	11-24-86	11-24-86
NRC	Audits of Projects/Contractors	12-31-86	12-31-86	12-31-86

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PDR WASTE
WM-10 PDR

BWIP 2209
NNWSI 1227
SALT 1496

As you can see from the schedule above, and in more detail in the attachment, the implementation of a fully qualified QA program at some projects will almost certainly be on the critical path for issuance of the SCP on schedule. For all projects there is substantial risk of QA ending up on the critical path because of the uncertainty in the time it will take to revise QA plans and procedures following their review by OGR and NRC, and the time it will take to complete the corrective action required to respond to the findings made during the OGR management appraisals and audits.

The schedule is also based on the assumption that NRC in their audits will find no major flaws in our program. Following the NRC audits and issuance of the NRC audit reports, we will have only a few months (until start of exploratory shaft construction in June '87) to complete all required corrective action and to have NRC, by a re-audit, confirm that all their findings have been adequately addressed.

Please review the milestones for your project in the schedule above and in the attachment and advise me of any problems you might have in meeting them and of your suggestions for resolving any such problems so that the SCP's can be issued as scheduled.

Please contact Carl Newton if any questions arise about the schedule we are proposing.


William J. Purcell
Associate Director for
Geologic Repositories
Office of Civilian Radioactive
Waste Management

Attachment:

DOE-HQ OGR Near-Term Quality Assurance Action Plan For 1986

1. ESTABLISH A QUALIFIED OGR QA PLAN

- a. HQ transmit draft revised QA Plan to Project Offices (PO) for comments 03/28/86
- b. PO comments received at QACG Mtg. 04/24/86
- c. PO comments dispositioned and revisions on QA Plan made 06/15/86
- d. Revised OGR QA Plan issued. 06/30/86
- e. QA Plan transmitted to NRC for comments 07/15/86
- f. NRC comments received 08/30/86
- g. Final issue of Revised OGR QA Plan. 10/15/86

2. ESTABLISH QUALIFIED OGR QUALITY IMPLEMENTING PROCEDURES (QIP's)

- a. Draft revisions to HQ reviewers 05/09/86
- b. HQ review comments received 06/23/86
- c. Revised QIP's incorporating comments issued 08/15/86
- d. Three additional QIP's* (drafts) to HQ reviewers. 05/22/86
- e. HQ review comments received on 3 QIP's. 07/07/86
- f. Revised 3 QIP's incorporating comments issues 08/15/86
- g. All QIP's transmitted to NRC for comments 08/29/86
- h. NRC comments received 10/24/86
- i. Final issuance of all OGR QIP's 11/21/86

*These QIP's are: 3.0 (Design Review), 3.2 (Technical Review) and 16.1 (Unusual Occurrence Reporting)

3. COMPLETE OGR QA INDOCTRINATION AND TRAINING

- a. Training materials prepared 04/17/86
- b. Training sessions completed 05/15/86
- c. Training report submitted 05/30/86

4. CONDUCT OGR INTERNAL QA AUDITS

- a. Internal audit plan issued by HQ. 04/14/86
- b. Send notification letter. 05/05/86
- c. Audit final checklists prepared 05/19/86
- d. Completion of audits. 06/06/86
- e. Audit report issued 07/21/86
- f. Corrective Action (CA) response received. 09/08/86
- g. CA completed and verified 12/15/86

HQ-OGR QA PROGRAM FULLY IMPLEMENTED. 12/15/86

5. RESPOND TO NRC QA AUDIT OF HQ-OGR

- a. Notify NRC about HQ readiness 12/31/86
- b. NRC audit of HQ completed 02/16/87
- c. NRC audit report issued 03/31/87
- d. OGR response on audit findings sent to NRC. 06/01/87
- e. OGR CA complete 07/31/87

6. ESTABLISH QUALIFIED PROJECT OFFICE (PO) QA PLANS

	BWIP	NNWSI	SRPO
a. PO revised QA Plans received at HQ.	04/15/86	07/31/86	02/15/86
b. HQ comments transmitted to PO	04/29/86	08/14/86	04/22/86
c. PO issues Revised Plan.	06/02/86	09/12/86	06/20/86
d. HQ submits QA Plan to NRC	06/16/86	09/19/86	06/27/86
e. NRC comments received	08/15/86	11/07/86	08/15/86
f. QA Plan revised	10/17/86	12/12/86	10/14/86

7. ESTABLISH QUALIFIED PO QA PROCEDURES

a. Draft PO Procedures received at HQ.	06/20/86	07/31/86	03/31/86
b. HQ comments transmitted to PO	07/03/86	08/14/86	04/14/86
c. PO issues Final QA Procedures	08/01/86	09/12/86	06/20/86
d. HQ submits PO QA Procedures to NRC.	08/08/86	09/19/86	06/27/86
e. NRC comments received	10/10/86	11/14/87	08/19/86
f. QA Procedures revised	11/14/86	12/19/87	09/24/86

8. HQ MANAGEMENT APPRAISALS OF PROJECTS/CONTRACTORS (TECHNICAL ASSESSMENTS)

a. Organize HQ assessment teams.	04/15/86	04/22/86	05/23/86
b. Send notification letter.	04/25/86	05/09/86	06/20/86
c. Develop and prepare checklists.	05/09/86	06/06/86	07/18/86
d. Complete field assessments of Projects and Contractors.	05/21/86	07/01/86	08/15/86
e. Assessment report issued.	06/27/86	08/07/86	09/12/86
f. Follow-up on corrective actions	09/05/86	09/19/86	10/03/86

9. HQ AUDITS OF PROJECTS

a. Send audit notification letter.	08/01/86	08/08/86	08/15/86
b. Prepare checklists.	08/22/86	08/29/86	09/19/86
c. Complete audits	09/05/86	09/19/86	10/03/86
d. Issue audit report.	10/03/86	10/10/86	10/24/86
e. Receive corrective Action (CA) response.	10/24/86	10/31/87	11/07/86
f. CA completed.	11/24/86	11/24/86	11/24/86

PROJECT QA PROGRAMS FULLY IMPLEMENTED 11/24/86 11/24/86 11/24/86

10. NRC AUDITS OF PROJECTS AND CONTRACTORS

a. Confirm Project/Contractor readiness to NRC.	11/26/86	11/26/86	11/26/86
b. NRC Audit completed	12/31/86	12/31/86	12/31/86
c. NRC Audit Reports transmitted to Projects	02/13/87	02/13/87	02/13/87
d. Corrective action (CA) response issued.	03/13/87	03/13/87	03/13/87
e. Evaluation of CA complete	04/17/87	04/17/87	04/17/88
f. CA complete	05/01/87	05/01/87	05/01/87
g. Verification audit of projects.	05/29/87	05/29/87	05/29/87
h. NRC approval of program	07/24/87	07/24/87	07/24/87

11. PARTICIPATE IN PROJECT OFFICE AUDITS

(See attached schedule in Attachment A prepared and revised as of 2/86)

SCP SUBMITTAL TO NRC		12/31/86	12/31/86	12/31/86
12. CONDUCT QACG MEETINGS	<u>April'86</u>	<u>July'86</u>	<u>Oct.'86</u>	<u>Jan.'87</u>
a. Issue meeting agenda	04/09/86	07/09/86	10/08/86	01/07/87
b. Meeting completed	04/23/86	07/23/86	10/22/86	01/21/87
c. Distribute meeting minutes	05/16/86	08/15/86	11/14/86	02/13/87

SCHEDULE OF OGR PARTICIPATION IN PROJECT AUDITS 4/86

OGR REPRESENTATIVE	ESTIMATED DATE	PROJECT OFFICE	CONTRACTOR
Richard J. August	5/19-23/86 8/18-22/86	SRPO SRPO	Brookhaven Nat. Lab. ONWI
Charles E. Brooks	4/22-27/86 7/14-18/86	SRPO CRPO	Parsons Brinckerhoff USGS
David J. Brown	4/14-18/86 5/27-30/86 6/23-27/86 7/14-18/86 8/18-22/86	BWIP BWIP SRPO WMPO WMPO	Raymond Kaiser Eng./PB Westinghouse Hanford Lab. Lawrence Berkeley Lab. Los Alamos Nat. Lab. Holmes & Narver
Renee M. Coleman	4/7-10/86 9/15-19/86	BWIP WMPO	BWIP (Document Control) Sandia Nat. Lab.
Carol L. Hanlon	7/28-31/86 9/1-5/86 9/22-26/86	BWIP SRPO SRPO	BWIP (Corrective Action) Lawrence Livermore Nat. Lab. Pacific Northwest Lab.
Librado D. Ibe	6/16-20/86 9/9-11/86	WMEQ SRPO	Fennix & Scission Parsons - Redpath
Hugh W. Joy	7/7-14/86 8/4-8/86	BWIP SRPO	Rockwell (Drilling) Flour
Carl D. Newton	3/10-14/86 3/25-28/86 5/26-30/86 8/4-8/86	WMPO BWIP WMPO WMPO	USGS Denver Rockwell (Audits) SAIC/T&MSS Internal
Jay Rhoderick	6/16-20/86 7/14-18/86	SRPO SRPO	Texas B.E.G. USGS
Edward W. Sulek	1/14-17/86 4/14-18/86 6/23-27/86	SRPO WMPO CRPO	ONWI Reynolds Electric Co. Battelle
Daniel Youngberg	5/5-8/86 8/5-11/86	BWIP BWIP	Rockwell (Rock Mechanics) Rockwell (Geomorph., Tect.)

FOR OCRWM DISTRIBUTION

SUBJECT: Schedule for NRC Audits of Projects

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OGR Reading File
L&R Div. Chron
L&R Div. File # 12.11

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PC Code: CN.NRC
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