

memorandum

PDR - 1
LPDR
WM-10 (2)
WM-11 (2)
WM-16 (2)

DATE: OCT 7 1986

REPLY TO: RW-24
ATTN OF:

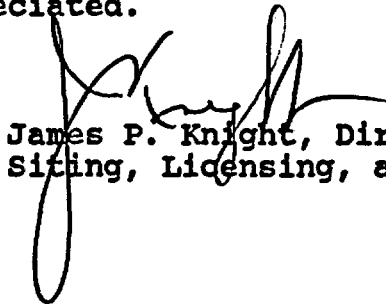
SUBJECT: HQ/OGR Disposition to Project Office Comments on NRC Review Plan

TO: D. Vieth, WMPO
J. Neff,
S. Mann,
L. Olson,

HQ-OGR has reviewed and consolidated the project office comments, along with HQ comments, and has forwarded them to the NRC.

Attached is a comment/resolution matrix delineating the HQ-OGR disposition to each of the project office comments. In general, those comments which only served to clarify how the project would comply with the requirements, and did not modify or clarify the requirements, were not included in the HQ-OGR comments forwarded to the NRC.

The project comments will help improve the NRC review plan; your timely input was appreciated.



James P. Knight, Director
Siting, Licensing, and QA Division

Attachment:

WM DOCKET CONTROL CENTER

86 OCT -8 AM 11:00

WM Record File

101.7
102.7
106.4

WM Project: 10, 11, 16

Docket No. _____

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HQ-OGR DISPOSITION TO BWIP
PROJECT COMMENTS TO NRC REVIEW PLAN

NRC Review
Plan Section

HQ-OGR Disposition

7.5

Comment #1

Incorporated in HQ-OGR comment #6.

3.8

Comment #2

Proposed Rewording does not appear to add any changes or clarification which would affect DOE's implementation or compliance with the intent of this requirement.

5.1

Comment #3

Incorporated as HQ-OGR comment #5.

-

Comment #4

Since surveillance is a DOE program requirement, not an NRC regulatory requirement, SRP evaluation criteria is not required.

Appendix A: Exceptions and Clarifications

1.1

A.1

Reference HQ-OGR comment #2 to NRC.

A.2

Project clarification only, no change to SRP required.

1.10

A.3

Reference HQ-OGR comment #2 to NRC.

1.11

A.4

Reference HQ-OGR comment #2 to NRC.

1.15

A.5

Reference HQ-OGR comment #2 to NRC.

HQ-OGR DISPOSITION TO BWIP
PROJECT COMMENTS TO NRC REVIEW PLAN
(continued)

NRC Review Plan Section	HQ-OGR Disposition
3.6	<u>A.6</u> Project clarification only, no change to SRP required.
9.1	<u>A.7</u> Project clarification only, no change to SRP required.
11.3	<u>A.8</u> Project clarification only, no change to SRP required.
13.1	<u>A.9</u> Project clarification only, no change to SRP required.
14.1	<u>A.10</u> Incorporated in HQ-OGR comment #8 to NRC
16.2	<u>A.11</u> It is HQ-OGR's position that corrective action is taken to preclude all nonconformances.
16.4	<u>A.12</u> Project clarification only, no change to SRP required.
17.1	<u>A.13</u> It is HQ-OGR's position that geotechnical samples be considered as technical records as specified in the NRC Review Plan.

HQ-OGR DISPOSITION TO SRPO
PROJECT COMMENTS TO NRC REVIEW PLAN

NRC Review
Plan Section

HQ-OGR Disposition

- 1.1 While it is DOE's policy that verification of proper performance and conformance of work is a line management function, the QA function of independent assessment of the adequacy and effectiveness of the QA program satisfies this requirement. (Ref. HQ-OGR comment #2 to NRC on Review Plan clarification of line management vs. QA function quality responsibilities.)
- 1.10 Incorporated in HQ-OGR comment #2a to NRC.
- 1.11 Incorporated in HQ-OGR comment #2b to NRC.
- 1.15 Incorporated in HQ-OGR comment #2c to NRC.

2.1 Comment #1

Numerical performance objectives and standards are defined in documents such as 10 CFR 60, OGR General Requirements Document and other OGR technical baseline documents, which satisfy this requirement. The issue of their applicability to conceptual design does not preclude the necessity to establish these performance objectives and standards.

Comment #2

While it is agreed a consistent methodology and rationale for ranking and how this ranking relates to an acceptable QA program design is required within DOE, a revision to the Review Plan is not required to accomplish this.

- 2.2 Incorporated in HQ-OGR comment #3 to NRC.

2.4

- 2.7 The applicability of this requirement to individual items or services will be addressed through DOE's graded approach to Quality Assurance.

3.1 Comment #1

Reference HQ-OGR Comment #2b to NRC

HQ-OGR DISPOSITION TO SRPO
PROJECT COMMENTS TO NRC REVIEW PLAN
(continued)

NRC Review
Plan Section

HQ-OGR Disposition

- 3.1 (cont.) Comment #2
- The SRP terminology is consistent with 10 CFR 60. The cited difference in terminology has no significant impact on DOE's implementation or compliance.
- 3.6 Comment #1 & #2
- The intent of this requirement is to assure QA review of the design drawings, specifications, criteria, etc., not the specific procedures themselves. (Reference section 2.4 of SRP for procedure review requirements.)
- 3.10 Incorporated in HQ-OGR comment #4 to NRC.
- 7.5 Comment #1 & #2
- Incorporated in HQ-OGR comment #6 to NRC
- 9.3 QA involvement in the qualification of special process operations is required, to the extent necessary, to assure the adequacy and effectiveness of the qualification programs. This involvement is typically through surveillance and audit activities, which satisfies this requirement.
- 10.2 Incorporated in HQ-OGR comment #7 to NRC.
- 11.1 While redundant, this requirement has no impact on DOE's implementation or compliance.
- 16.2 Comment #1 & #2
- It is HQ-OGR's position that corrective action is taken to preclude all nonconformances.
- 17.2 The applicable DOE QA program(s) will define specific responsibilities for QA records to preclude any misunderstanding.
- 18.7 Incorporated in HQ-OGR comment #9 to NRC

HQ-OGR DISPOSITION TO NNWSI
PROJECT COMMENTS TO NRC REVIEW PLAN

NRC Review
Plan Section

HQ-OGR Disposition

General

NNWSI comments, including the proposed strawman outline for the SRP, have been included in HQ-OGR comment #1 to NRC.

FOR OCRWM DISTRIBUTION

SUBJECT: HQ/OGR Disposition to Project Office Comments on NRC Review Plan

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