

JUN 24 1992

MEMORANDUM FOR: Joseph Holonich, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

FROM: Ken Hooks, Section Leader
Quality Assurance Section
Repository Licensing and Quality
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Division of High-Level Waste Management
Office of Nuclear Material Safety
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SUBJECT: IMPLEMENTATION OF CNWRA TOP-001-11 FOR DEVELOPMENT OF
COMPLIANCE DETERMINATION STRATEGIES (CDSs)/COMPLIANCE
DETERMINATION METHODS (CDMs)

On June 19, 1992, a concern was raised about the validity of developing CDSs to the Center for Nuclear Waste Regulatory Analyses (CNWRA) Technical Operating Procedure (TOP) TOP-001-11. After considerable discussion with the CNWRA quality assurance (QA) staff, it has been determined that TOP-001-11 is valid for developing CDSs even though several of the Regulatory Requirements (RRs) listed on page 26 of Attachment D are no longer valid.

Attachment D of TOP-001-11 is meant to be an example only as stated in Section 7, page 4 and again on page 20. The examples in TOP-001-11 are meant to provide general guidance. Minor changes to examples do not make the procedure invalid. Therefore, changes to the Type 3 REOP list on pages 26-29 do not mean the procedure must be revised prior to implementation.

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Ken Hooks, Section Leader
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