

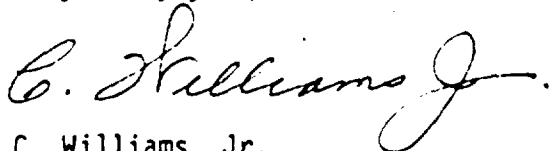
COMMITTEE CORRESPONDENCE

committee	Subcommittee on Nuclear Waste Management	address writer care of	Battelle Project Management Division 505 King Avenue Columbus, Ohio 43201
subject	R.F. Reedy's Comments on Proposed NQA-3 Draft 3, Rev 0		
date	December 17, 1987	copy to	S Ailes R Dann G Fones F Hood R Schrotke
to:	SCNWM Members		

Attached for your information and appropriate action are R. F. Reedy's comments on NQA-3 Draft 3, Rev 0.

Please review these comments and, where appropriate, incorporate them into NQA-3 Draft 3, Rev 1. Maintain documentation of your disposition.

Very truly yours,



C. Williams, Jr.
Chairman

CW:dsh
Q-87-106
Attachment

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PDR [REDACTED] PDR
407.19



The American Society of
Mechanical Engineers

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CLARENCE WILLIAMS, JR.
BATTELLE PROJECT MANAGEMENT
DIVISION
505 KING AVE
COLUMBUS OH 43201

R.F. REEDY'S COMMENTS ON DRAFT NQA-3

I am opposed to the continuance of any effort to write a separate NQA-3 document for Nuclear Waste Repositories. I have discussed this subject with Mr. James P. Knight of the DOE who is responsible for quality assurance at Waste Repositories and he is also against the publication of NQA-3. He feels that the provisions of NQA-1 are ample to take care of any QA needs with regard to Nuclear Waste Repositories. Jim does admit that there are some people in DOE who would like to have this document, but feels that they are wrong.

I have also had a discussion regarding this issue with Mr. Raymond D. Watts, who is Deputy Assistant Director for Research at the United States Geological Survey. He is adamantly opposed to the issuance of NQA-3. He has read the document, felt that it would be impossible to work with and not based on the way people are currently doing business. He feels that the imposition of a document would impose severe hardships on the USGS with regard to both cost and schedule.

Some of my specific comments are:

This draft on NQA-3 is written as though it is an invoking document. Neither NQA-1 nor NQA-2 are written in this manner and they depend on other Codes and Standards invoking their use. Any other NQA document should be written in the same way.

There is nothing written in this draft of NQA-3 that is not currently allowed in NQA-1. It does give more detail on some things such as laboratory work, control of samples, peer review and graded QA. However, all of these issues can be handled in NQA-1 if it is necessary.

There has been no demonstration to show that this document is actually required. No one has shown that NQA-1 is not sufficient. NQA-3 is not based on actual work practices, but rather, it is based on how some individuals believe work should be done.

The NQA-1 Committee is currently developing guidance for QA regarding computer software. NQA-3 should not preclude that effort.

- o The section on Design Control is written in such a way that Edward Teller would be required to review and agree with work performed by Albert Einstein. On page 13 of the document, under design control, there are paragraphs regarding management assessments and communications. Neither of these have anything to do with design control. They address the overall QA program. This illustrates why all QA should stay under NQA-1.
- o Under Correction Action (should be corrective action) there is a write-up on trend analysis. However, the write-up fails to mention root cause determination which is required in order to have an effective evaluation. As it stands, the trend analysis will give some results which would not be consistent with facts.
- o With regard to Quality Assurance Records, it is interesting to note that on page 28, that all documents referenced by final reports must be retrievable from the QA records system. This requirement would greatly and unnecessarily expand the record retention requirements. The NRC has always recognized that results documents can be summarized and consolidated. The requirements here would be the opposite of that. In addition, there is an industry effort (NCIG) going on which is designed to reduce the number of records. NQA-3 requires record retention up to 1,000 years. Could this be a serious requirement?
- o On page 29, it is required that auditors have the appropriate technical expertise or experience in the work being audited. This may mean that we will need some very senior research Ph.D.s to do the routine auditing of Waste Repositories. This is absolutely ridiculous.
- o On page 30 there is a some of the terms and definitions which contain phrases that themselves are subject to wide interpretation. These are: "impact on the validity," "cause undo risk," "adversely impact" and other similar phrases which cause many discrepant interpretations, increase cost and delays in activities.
- o The requirements for supplementary design control requires that any time a checker finds work to be incorrect or incorrectly transcribed, the incorrect work must be controlled by procedures. This means that a design calculation with a simple addition or subtraction error in it will have to be dispositioned under these conditions. The costs associated with this will be outrageous.

- o The non-mandatory guidance for grading has very poor examples. Grading is often carried out at some plants and has been very profitable. However, the system set-up in NQA-3 is cumbersome, unproven and has not been shown to be warranted. If we can use grading under NQA-1 and have it accepted by the NRC, why do we need the cumbersome process being proposed in NQA-3?

In summary, I find absolutely no redeeming merit in any of the wording in the draft NQA-3. The project should be abandoned immediately. The fact that high officials in DOE and USGS do not want the document should cause grave concern about this issue. In addition, if further details are needed with regard to QA programs for Waste Repositories, they should come from the expertise developed over the past years within the NQA-1 Committee.

COMMITTEE CORRESPONDENCE

committee. Subcommittee on Nuclear Waste Management
address/writer care of Battelle Project Management Division
505 King Avenue
Columbus, Ohio 43201

subject: SCNWM Meeting

date: December 16, 1987
copy to R Dann
G Fones
F Hood
R Schrotke
S Weinman

to: SCNWM Members

The Subcommittee on Nuclear Waste Management will meet in Las Vegas, Nevada, on January 18 and 19, 1988, at the SAIC office. It is highly desirable that all SCNWM members attend this meeting. The primary objectives of the meeting will be to:

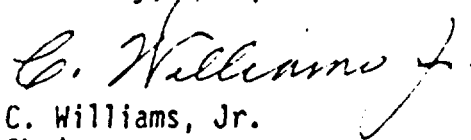
- Disposition/resolve all comments received in response to Main Committee Ballot No. 148
- Revise those portions of NQA-3 Draft 3, Rev 0 affected by the comments
- Ballot (within the subcommittee) all revised portions of NQA-3
- To finalize NQA-3 for forwarding to the Main Committee for rebalancing either as another "first consideration" of a new draft or as a "second consideration" of the previous draft.

During my review of the Main Committee comments I have observed several incorrect page references and several instances where the comments are difficult, if not impossible, to interpret. If you encounter these conditions please contact the reviewer ASAP for clarification.

Attached you will find a listing of ballot assignments for NQA-3, Draft 3 Rev 1. Please use these numbers when you complete your assigned sections and forward them to the SCNWM members for balloting.

Please advise me if you are not going to be able to attend the meeting. Best wishes for a Merry Christmas and a productive New Year.

Sincerely,


C. Williams, Jr.
Chairman

CW:dsh
Q-87-103
Attachments



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CLARENCE WILLIAMS, JR.
BATTELLE PROJECT MANAGEMENT
DIVISION
505 KING AVE
COLUMBUS OH 43201

memorandum

HQO.871027.0085

DATE: OCT 26 1987
REPLY TO: RW-24
ATTN OF:
SUBJECT: HQ/OGR QA Review of ANSI/ASME NQA-3, Draft 3
TO: M.E. Langston, RW-40

NOTE:
ADDITIONAL
COMMENTS
ON NQA-3
Draft 3, Re

HQ/OGR QA have completed the review of ANSI/ASME NQA-3 (Draft 3, dated August 1987). Comments are provided on Attachment "A".

This review was performed to assess whether this Standard provides for the supplementary QA requirements associated with the collection of information for site characterization, as required by various program requirements documents, that are not provided for in NQA-1. We conclude that these requirements are covered, however, we offer the attached comments for your consideration.



Karl G. Sommer
General Engineer
Siting, Licensing & QA Division

Comments on ANSI/ASME
NQA-3, Draft 3, August 1987

1. Reference page 4, Section 2. We suggest limiting the applicability of this document to activities which could affect the quality of scientific and technical information required to support licensing.
2. The term "Readiness Review" is referenced in the Introduction Section and the Quality Assurance Program Section, however, the term is not defined in this Standard's Supplement-SW-1, glossary. We suggest the following definition; "a systematic, documented review of the readiness for startup and/or continued extended use of a facility, process or activity. Readiness reviews are typically conducted before proceeding beyond project milestones and prior to initiation of major work activities or events." This is the definition contained in the draft QAMPR (DOE/RW-0032) that is currently under revision.
3. Reference page 7, Section (b)(1). We suggest that the first sentence in this section be revised as follows: "Quality affecting site characterization activities...", since there are numerous other activities referenced in NQA-1 Supplement 2S-4 (which is applicable) that are also associated with licensing, such as; erecting, installing, maintaining, etc. This standard is limited to Site Characterization. Also, if this list is not all-inclusive, we suggest a revision to state this.
4. Reference page 18. We suggest that a definition be provided for the term "archival sample."
5. Reference page 18, Section (a)(1), Sample Identification. The NRC Review Plan, June 1984 criterion 8.2 allows that sample identification may be maintained on records traceable to the sample if not on the sample or sample container. We suggest that this provision be included in this section to avoid a conflict between requirements documents.
6. Reference page 23, "Handling, Storage, Transport, and Shipping of Samples." It is understood that these additions and amplifications to NQA-1 Requirement 13 are to provide for sample handling, storage, etc. However, we suggest deleting "OF SAMPLES" from the title of this section, it is too restrictive. Since it is referenced that the provisions of NQA-1 Requirement 13 shall apply; the shipping etc., of items and components associated with site characterization activities apply as well as these added provisions for samples.
7. Reference page 27, Section (c). We believe that for recurring quality problems where corrective actions have apparently not been effective that management has the responsibility to consider stopping work associated with the applicable activity. We suggest adding this provision.

8. Reference page 28, Section (c)(1). The DOE HQ-OGR is currently re-evaluating the necessity for the category of "Post-Closure Records" being defined at this time, i.e., site characterization of the three candidate sites. We recommend that until site selection, QA records classification be limited to lifetime and nonpermanent.
9. Reference page 28, Section (c)(2). Since there may be numerous applications for license amendments filed throughout the course of this program, we suggest that this section be revised to clarify that the "amendment of the repository license" as referenced here, is the license amendment for permanent closure.
10. Reference page 34, Section (9). The first and last sentence of this section appear to be conflicting. The first indicates that the section deals with the qualification of data which were not collected under a quality assurance program. However, the last sentence indicates that an acceptable qualification method of this data is the demonstration that the data were collected under a quality assurance program. We suggest revising the last sentence of this section to read "..., and demonstration that the data were collected under circumstances equivalent to the requirements of a quality assurance program as described in this standard."
11. Reference page 42, Section (a). See comment #9.

8. Reference page 28, Section (c)(1). The DOE HQ-OGR is currently re-evaluating the necessity for the category of "Post-Closure Records" being defined at this time, i.e., site characterization of the three candidate sites. We recommend that until site selection, QA records classification be limited to lifetime and nonpermanent.
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11. Reference page 42, Section (a). See comment #9.

ATTACHMENT B

<u>BALLOT NO.</u>	<u>SECTION</u>	<u>LEAD RESPONSIBILITY</u>
1	● Introduction	C. Williams
	<u>BR-2</u>	
2	● Planning	C. Williams
3	● Personnel, Selection, Indoctrination Training and Qualification	G. Fones/C. Williams
4	● Surveillance	R. Dann/C. Williams
5	● Management Assessment	R. Lowder
	● Communications	R. Lowder
	<u>BR-3</u>	
6	● Control of Scientific Investigations	M. Bell
	● Peer Review	M. Bell
7	● Design Data Processing Control	M. Nicol
8	● Computer Software Control	R. Schrotke/S. Aile
	<u>BR-8</u>	
9	● Sample Management	S. Klein
	<u>BR-11</u>	
10	● Test Control	M. Nicol
	<u>BR-13</u>	
11	● Handling, Storage, Transport and Shipping of Samples	S. Klein
	<u>BR-16</u>	
12	● Trend Analysis	H. Kirschenmann
	● Reporting and Resolution of Quality Problems	H. Kirschenmann
	● Recurring Quality Problems	H. Kirschenmann
	<u>BR-17</u>	
13	● Quality Assurance Records	G. Fones/C. Williams
	<u>BR-18</u>	
14	● Audits	M. Bell

<u>BALLOT NO.</u>	<u>SECTION</u>	<u>LEAD RESPONSIBILITY</u>
	<u>Supplement SW-1</u>	
15	● Terms & Definitions	P. Bussolini
	<u>Supplement 3SW-1</u>	
16	● Supplementary Requirements for Design Data Requiring Control	M. Nicol
	<u>Supplement 11SW-1</u>	
17	● Supplemental Requirements for Collection of Test Data	M. Nicol
	<u>Appendix 2AW-1</u>	
18	● Nonmandatory Guidance for the Determination and Use of QA Program Grading Factors	F. Hood/C. Williams
	<u>Appendix 17AW-1</u>	
19	● Nonmandatory Guidance on Quality Assurance Records	G. Fones/C. Williams

COMMITTEE CORRESPONDENCE

committee: Subcommittee on Nuclear Waste Management
address writer care of Battelle Project Management Division
505 King Avenue
Columbus, Ohio 43201

subject EEI/UNWMO Endorsement of Proposed NQA-3

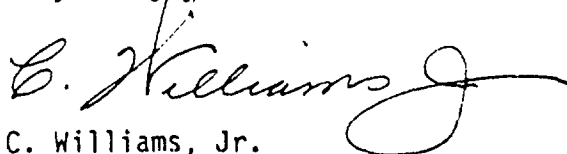
date: December 17, 1987
copy to S Ailes
R Dann
G Fones
F Hood
R Schrotke

to: SCNWM Members

The attached letters are forwarded for your information and encouragement.
Keep up the good work.

Responsible Authors - Please make a New Year's resolution to get your revised NQA-3 sections out for subcommittee balloting prior to January 8, 1988. This will permit subcommittee members to review and comment on the new sections prior to our January 18 and 19 meeting in Las Vegas.

Very truly yours,



C. Williams, Jr.
Chairman
Subcommittee on Nuclear
Waste Management

CW:dsh
Q-87-0105
Attachments



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COMMITTEE CORRESPONDENCE

—Keep ASME Codes and Standards Department Informed—

COMMITTEE: Board on Nuclear Codes and Standards ADDRESS WRITER CARE OF:

SUBJECT: Proposed ANSI/ASME NQA-3

J.A. Perry, Vice President
Quality Assurance Department
Niagara Mohawk Power Corp.
300 Erie Boulevard West, F-2
Syracuse, NY 13202

DATE: November 23, 1987

COPY TO: NQA Executive Committee
L.J. Chockie
M.E. Langston
J. Ling

TO: Mr. Clarence Williams, Jr.
Battelle Project Management Division
QA Manager
505 King Avenue
Columbus, OH 43201

Dear Clarence:

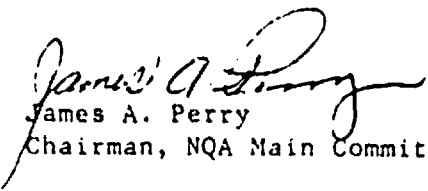
I am pleased to forward to you a copy of correspondence I just received from the Edison Electric Institute, Utility Nuclear Waste Management Group siting very strong endorsement of proposed NQA-3 Standard for QA Program Requirements for Collection of Scientific and Technical Information for Site Characterization of High Level Nuclear Waste Repositories. The letters are signed by the Director, S.P. Kraft. One letter is addressed to me as Chairman of the NQA Main Committee, the other two attached letters are addressed to Mr. Browning of the NRC, and to Mr. Kale of the U.S. Department of Energy.

It is apparent from the content of these letters that the Utility Nuclear Waste Management Group is enthusiastically in support of the effort of your Subcommittee and is anxious to see this document issued in the very near future.

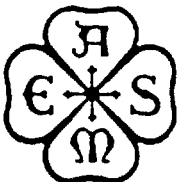
Congratulations on an outstanding effort to date and I look forward to proper resolution of comments and issuance of this important QA Standard.

If I can be of any further assistance in this regard, please don't hesitate to call on me.

Very truly yours,


James A. Perry
Chairman, NQA Main Committee

JAP/ams



UNWMG

Utility Nuclear Waste Management Group

1111 19th Street, N.W. ■ Washington, D.C. 20036-3691 ■ (202) 778-6512

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Wisconsin Public Service Corporation
Yankee Atomic Electric Company

November 16, 1987

NIAGARA MOHAWK POWER CORPORATION

RECEIVED

NOV 23 1987

QUALITY ASSURANCE DEPARTMENT
J. A. PERRY - V.P.
5144158

Mr. James A. Perry
Chairman, ASME NQA Main Committee
c/o Niagara Mohawk Power Company
300 Erie Boulevard West
Syracuse, New York 13202

Subject: Utility Nuclear Waste Management Group's Endorsement of ANSI/ASME NQA-3, Rev. 0, "Quality Assurance Program Requirements for the Collection of Scientific and Technical Information for Site Characterization of High-Level Nuclear Waste Repositories"

Dear Mr. Perry:

The Utility Nuclear Waste Management Group (UNWMG) has completed its review of the the third draft of ANSI/ASME NQA-3, Rev. 0, dated August 1987. Revision 0 was recently finalized and approved by the ASME NQA Nuclear Waste Management Subcommittee (NWMSC). We strongly believe that the specific waste management QA guidance reflected in this standard is urgently needed for the repository program effort and we are impressed with the rapid progress that NWMSC has made recently in this area.

We are writing to you for several reasons. First, we want you and your committee members to know that we fully support NQA-3 and are anxious for it to be issued within the very near future. Second, we encourage the members of the NQA Main Committee to put aside any differences in opinion they may have with NWMSC members regarding such issues as: ways to improve the wording; whether it would be more appropriate to put portions of NQA-3 into NQA-1; whether portions of NQA-3 should be non-mandatory appendices instead of supplement, etc.

Instead, we would like to request your Main

UNWMO

Mr. James A. Perry
Page Two
November 16, 1987

Committee members to consider giving the present version of NQA-3 (Rev. 0) a chance to work. As QA professionals, your members know that there are times when it is more important to release a document (e.g., a QA procedure or instruction) in a timely manner and "get it on the street" than it is to spend precious additional time massaging it to a greater state of perfection. We believe that NQA-3 falls into this category.

By separate letter, we are requesting the ASME NQA Executive Committee members to consider ways in which to expedite NQA-3 through the balloting process. While NQA-3 should receive due consideration by all concerned, it would be detrimental to the progress of the waste repository program if its release for use was to be unduly delayed.

Your help in this regard is genuinely appreciated. Should you have any questions or require additional information, please feel free to call Mrs. Nancy Montgomery of my staff at (202)778-6513.

Sincerely,


S. P. Kraft
Director

NSM/sar

UNWMG

Utility Nuclear Waste Management Group

1111 19th Street, N.W. ■ Washington, D.C. 20036-3691 ■ (202) 778-6512

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Duquesne Light Company
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Florida Power & Light Company
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Union Electric Company
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South Carolina Electric & Gas Company
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Texas Utilities Company
Toledo Edison Company
Virginia Power
Washington Public Power Supply System
Wisconsin Electric Power Company
Wisconsin Public Service Corporation
Yankee Atomic Electric Company

November 16, 1987

Mr. Robert E. Browning
Director, Division of High
Level Waste Management
Office of Nuclear Materials
Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Utility Nuclear Waste Management Group's
Endorsement of ANSI/ASME NQA-3, Rev. 0,
"Quality Assurance Program Requirements
for the Collection of Scientific and
Technical Information for Site Charac-
terization of High-Level Nuclear Waste
Repositories"

Dear Mr. Browning:

The Utility Nuclear Waste Management Group (UNWMG) has completed its review of the the third draft of ANSI/ASME NQA-3, Rev. 0, dated August 1987. Revision 0 was recently finalized and approved by the ASME NQA Nuclear Waste Management Subcommittee (NWMSC). We strongly believe that the specific waste management QA guidance reflected in this standard is urgently needed for the repository program effort and we are impressed with the rapid progress that NWMSC has made recently in this area.

The purpose of this letter is to inform you of our full support for NQA-3 and request NRC action in several areas.

o We are very anxious to see NQA-3 move rapidly through the approval cycle within the ASME NQA Main Committee as well as through the Board on Nuclear Codes and Standards. Toward this end, we would sincerely appreciate it if you would send an NRC position statement to both groups in the near future supporting NQA-3.

UNWMO

Mr. Robert E. Browning
Page Two
November 16, 1987

- o As you know, it was a number of years from the time when NQA-1 was issued until it was endorsed by the NRC in Regulatory Guide 1.28. We recommend that plans be developed now that would facilitate the timely endorsement of NQA-3 by the NRC in a Regulatory Guide.
- o In the meantime, we encourage you to take an immediate, interim step to embrace NQA-3, Rev. 0 in a manner similar to the way the NRC "Rainbow Books" (grey, green, and orange) embraced draft N45.2/daughter standards in the early Seventies. This would facilitate the timely use of the guidance contained in NQA-3 while it travels through the rest of the ASME approval cycle.

We would be pleased to meet with you to discuss this subject in more detail, should you so desire. Should you have any questions or require additional information, please feel free to call Nancy Montgomery.

Sincerely,



S. P. Kraft
Director

NSM/sar

cc: Mr. Stephen H. Kale, DOE
Mr. James P. Knight, DOE
Mr. Michael Bell, NRC
Mr. James Kennedy, NRC
Mr. James A. Perry, ASME
Mr. Bertrand R. Mazo, ASME

UNWWMG

Utility Nuclear Waste Management Group

1111 19th Street, N.W. ■ Washington, D.C. 20036-3691 ■ (202) 778-6512

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November 16, 1987

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QUALITY ASSURANCE DEPARTMENT

J. A. PERRY - V.P.

SYRACUSE

Mr. Stephen H. Kale
Associate Director, Office
of Geologic Repositories
Office of Civilian Radioactive
Waste Management
U. S. Department of Energy
Washington, D.C. 20585

Subject: Utility Nuclear Waste Management Group's
Endorsement of ANSI/ASME NQA-3, Rev. 0,
"Quality Assurance Program Requirements
for the Collection of Scientific and
Technical Information for Site Charac-
terization of High-Level Nuclear Waste
Repositories"

Dear Mr. Kale:

The Utility Nuclear Waste Management Group (UNWWMG) has completed its review of the the third draft of ANSI/ASME NQA-3, Rev. 0, dated August 1987. Revision 0 was recently finalized and approved by the ASME NQA Nuclear Waste Management Subcommittee (NWMSC). We strongly believe that the specific waste management QA guidance reflected in this standard is urgently needed for the repository program effort and we are impressed with the rapid progress that NWMSC has made recently in this area.

We fully support NQA-3 and urge your office to do so as well. Our support is based on the following:

- o Whereas NQA-1 provides excellent QA guidance for many nuclear power projects, it is not adequate in addressing a number of needs that are specific to the collection of scientific and technical information for site characterization of high-level nuclear waste repositories. The latest draft of NQA-3 does

UNWMO

Mr. Stephen H. Kale
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a fine job in this regard by addressing such subjects as peer reviews, sample management, post-closure QA records control (for QA records to be retained for 300-1000 years), etc.

- o Approval of NQA-3 should lead to the elimination of several NRC Generic Technical Positions (GTPs) because such GTP subjects as peer review, qualification of existing data, and quality levels are adequately addressed in NQA-3.
- o DOE Order 5700-6A on Quality Assurance makes it clear that national consensus quality assurance standards are to be applied to DOE programs where suitable ones are available. As stated above, NQA-1 is not adequate for site characterization. Instead, NQA-3 is the national consensus standard needed in this area.

For reasons such as those stated above, we are anxious to see NQA-3 move rapidly through the approval cycle within the ASME NQA Main Committee as well as through the Board on Nuclear Codes and Standards. We firmly believe that a position statement from you to these organizations expressing your support for NQA-3 would have a very positive effect in obtaining the timely approval of NQA-3.

We would welcome the opportunity to discuss our thoughts on this matter with you at greater length if you would like. Should you have any questions or require additional information, please feel free to call Nancy Montgomery.

Sincerely,


S. P. Kraff
Director

NSM/sar

cc: Mr. James P. Knight, DOE
Mr. Robert E. Browning, NRC
Mr. Michael Bell, NRC
Mr. James Kennedy, NRC
Mr. James A. Perry, ASME
Mr. Bertrand R. Mazo, ASME

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