

# COMMITTEE CORRESPONDENCE

committee: Subcommittee on Nuclear Waste Management  
address writer care of: MAC Technical Services  
P. O. Box 1508  
Richland, WA 99352


subject: Minutes of the October 21, 1987 Meeting

date: 10/23/87  
copy to: Steve Weinman  
ASME NQA-1 Committee  
345 East 47th Street  
New York, NY 10017

to: Distribution

Enclosed are the minutes of the meeting which was held in San Francisco, California on October 21, 1987. Also included are the comments, received with the ballots on the NQA-3, with the name of the individual who has the responsibility for resolving the comments written to the right of the comment.

Sincerely,



Donald G. Summers  
Secretary SCNWM

8803230240 871023  
PDR ~~WASTE~~ WASTE PDR  
407.19

WM Record File

407.19

WM Project

Docket No.

PDR

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The American Society of  
Mechanical Engineers

345 East 47th Street  
New York, NY 10017

Keep ASME Codes and Standards Department

SUBCOMMITTEE 11/87

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## MEETING MINUTES

### NUCLEAR WASTE MANAGEMENT SUBCOMMITTEE

OCTOBER 21, 1987

#### 87.3 ATTENDEES

##### 1.1 MEMBERS PRESENT

Clarence Williams Jr. - Chairman  
Mike Nicol - Vice Chairman  
Greg Fones - Acting Secretary for Don Summers  
Bob Bearden  
Mike Bell  
Pete Bussolini  
Bill Coleman (designee for Tom Colandrea)  
Harley Kirschenmann  
Dick Lowder

##### 1.2 MEMBERS ABSENT

Don Summers  
Tom Colandrea  
Stan Klein  
Gene Langston

##### 1.3 VISITORS PRESENT

Wayne Baker  
Dorset Baden  
Robert Dann  
Charles O'Neil  
Ron Schrotke, Jr.  
Jim Sellards  
Ray Vurpillat

#### 87.4 ACTION ON AGENDA ITEMS

- 2.1 The minutes from the March 11 and 12, 1987, meeting were approved without change.
- 2.2 Don Summers was not present to report on the activities of the Low Level Waste Working Group. A meeting had tentatively been scheduled during the week of October 19-23, 1987, in San Francisco, but had to be postponed. See actions proposed for this Work Group in Section 2.7. Mike Bell and Dick Lowder repeated their commitment to be on this Work Group. The Working Group was assigned with the following actions:

- o Provide recommendation for scope

- o Write charter for scope
- o Provide justifications for scope and charter
- o prepare task proposal notices
- o Identify external interfaces and requirements
- o Provide personnel recommendations

These actions are due by February 1, 1988.

H. Kirschenmann, M. Nicol, B. Bearden, and G. Fones volunteered to assist the Work Group to accomplish this.

### 2.3 SUBCOMMITTEE MEETING

The scheduled preliminary Subcommittee Meeting was postponed and the proposed agenda was completed during the regular Subcommittee Meeting.

### 2.4 STATUS REPORT ON APPROVED SUBTASKS

- .1 Test Control (11S-2): It was decided that this item could be closed since the requirements have been incorporated into NQA-3.
- .2 Review of NOA Definitions: It was decided that this item could be closed since the definitions required have been incorporated in NQA-3.
- .3 Surveillance by Technical Personnel: It was decided that this could be closed since the requirements have been incorporated in NQA-3.
- .4 Review of NOA-1: This will remain open.
- .5 Review of NOA-2: This will remain open.
- .6 Quality Assurance Planning: It was decided that this item could be closed since the requirements have been incorporated into NQA-3.
- .7 Procurement Document Control (Revision to 4A-1): Don Summers to provide status.
- .8 Review of DOE-OGR Supplements: It was decided to keep this open.
- .9 Subtask for NOA-3: Clarence Williams stated that there was not a subtask for NQA-3. Clarence took an action to write a letter to the Standard Coordinating Committee.

### 2.5 REPORT ON DOE QA ACTIVITIES

G. Langston was not present to provide current status, C. Williams did state that MACTEC Services has been in the process of revising DOE's QA Program (OGR/B-3). A request by C. Williams was made of DOE's representative at the next meeting to give a briefing on DOE's record systems being developed for the Licensing Support System.

## 2.6 REPORT ON NRC QA ACTIVITIES

Mike Bell reported on the status of NRC's activities relative to Nuclear Waste Management.

- .1 Mike Bell stated that the NRC Generic Technical Position for Peer Review and Qualification of Existing Data have been issued. The Generic Technical Position for Q-List is still in draft.
- .2 Mike reported that the NRC QA Plan is being revised. This revision will incorporate a list of the NQA-3 requirements. The QA Plan will be issued for review next spring.
- .3 Mike also reported that the NRC had conducted their first audit at Los Alamos, NM this summer. The audit report has been published. The NRC's next audits will be for the Salt Program (Texas Bureau of Technology) and BWIP (Hydrological/Geological).
- .4 Mike reported that the NRC Review Plan for the Application for Low Level Waste is being developed. Mike was not sure of the time table for completion, but did state that it does have a QA section.

## 2.7 DISCUSSION OF THE NEED FOR OTHER WORK GROUPS

Dick Lowder proposed that a new Work Group be established for Mixed Waste. Dick Discussed the need for the Subcommittee on Nuclear Waste Management to become involved stating that the EPA and NRC is proposing a Joint Guidance position. C. Williams proposed that a Task Group be formed. This Task Group (same as Section 2.2) will provide a recommendation with justification.

## 2.8 NQA-3 BRIEFING

C. Williams briefed the subcommittee on the current status of NQA-3 including M. Nicol's presentation to the Board of Codes and Standards; all six parts of NQA-3 failing on the 1st ballot by Main Committee; and Jim Perry's meeting with ANSI and the Board of Codes and Standards to justify NQA-3.

Clarence also discussed the comments received from the Main Committee, the States and Indians, Westinghouse, Morrison-Knudsen, Kaiser Engineers, Los Alamos, etc.

It was agreed that the priorities for incorporating comments will be as follows:

- .1 Main Committee
- .2 States and Indians
- .3 Miscellaneous (ASQC, ANSI, BWIP, WHC, M-K, etc.).

See the attached action items for specific assignments and responsibilities for resolving comments.

2.9 SUBCOMMITTEE PERSONNEL

P. McDuffie resigned from the Subcommittee. It was agreed that consideration for replacements should be for technical personnel, i.e. Hydrologist, Geologist, etc., before consideration of QA types. Pet Bussolini agreed to contact Ray Watts concerning possible membership.

2.10 ADJOURNED

This meeting was adjourned at 3:50 pm.

2.11 MEETING

A meeting is tentatively scheduled for January 18 and 19, 1988, in Las Vegas, Nevada, pending a location to conduct the meeting. The backup will be Columbus, Ohio. The purpose of this meeting will be to work on the attached Action Items.

## ACTION ITEMS

The following Action Items were agreed upon at our meeting in San Francisco.

1. Low Level Waste Working Group will accomplish this following by February 1, 1988:
  - o Provide recommendation for scope
  - o Write charter for scope
  - o Provide justifications for scope and charter
  - o Prepare task proposal notices
  - o Identify external interfaces and requirements
  - o Provide personnel recommendations
  - o Provide recommendations concerning Mixed Waste.
2. C. Williams will prepare a memo to assure that NQA-3 is carried as a subtask by the Standard Coordinating Committee.
3. The DOE Representative at the April 1988, Orlando, Florida meeting will brief Subcommittee on DOE's record systems being developed for the Licensing Support System.
4. NQA-3 Comments Resolution
  - 4.1 C. Williams to send all comments received as of 10/31/87 to all committee members by November 6, 1987. Clarence will also identify computer type that NQA-3 is currently on.
  - 4.2 Specific comments will be evaluated and responded to by the authors of the original section (see attached marked-up comments for responsibilities to be completed by January 18, 1988.
  - 4.3 Mike Bell will send two approved GTP's to committee members by November 6, 1987.
  - 4.4 Send new drafts to C. Williams for compiling and typing as soon as possible before the January 18, 1988 meeting.
  - 4.5 The following Task Group members shall be responsible for communicating/resolving comments listed as "Task Group" on the attached marked-up comment sheets:
    - M. Nicol (Lead)
    - M. Bell
    - P. Bussolini
    - B. Bearden
    - E. Langston

This Task Group actions are to:

1. Prepare responses and new text for comments by Main Committee by January 18, 1988
2. Provide M. Nicol with input to letters by December 1, 1987
3. M. Nicol to prepare two letters by January 15, 1988.
- 4.6 Clarence Williams will formulate an action plan to resolve comments received from the States.
- 4.7 It was agreed that Russel Jim's comments would be incorporated where appropriate, but we will fill out a comment sheet to address his comments.



Nuclear  
212-705-7801345 East 47th Street  
New York, NY 10017

October 19, 1987

To: The Nuclear Quality Assurance Main Committee

Subject: Closure of Letter Ballot #148  
 Proposed Standard NQA-3, Draft 3, Rev. 0  
 Introduction and Basic Requirements; QAD 87-03  
 Supplement SW-1; QAD 87-04 Supplement 3SW-1; QAD 87-05  
 Supplement 11SW-1; QAD 87-06 Appendix 2AW-1; QAD 87-07  
 Appendix 7AW-1; QAD 87-08

Gentlemen:

The subject ballot on proposed NQA-3 has closed with the results as follows:

<u>QAD #</u>	<u>87-03</u>	<u>87-04</u>	<u>87-05</u>	<u>87-06</u>	<u>87-07</u>	<u>87-08</u>
Approved	10	17	17	20	14	20
Approved-with-Comment	12	6	6	4	6	4
Disapproved with Reason	5	4	4	3	6	3
Abstain	0	0	0	0	1	0
<u>Total Voting Membership</u>	<u>27</u>	<u>27</u>	<u>27</u>	<u>27</u>	<u>27</u>	<u>27</u>
Not Returned	1	1	1	1	1	1
Not Voting	0	0	0	0	0	0
<u>Total Listed Membership</u>	<u>28</u>	<u>28</u>	<u>28</u>	<u>28</u>	<u>28</u>	<u>28</u>

As a first consideration ballot the proposed revisions are not approved having received negative ballots. The negatives and comments are attached and have been transmitted to Mr. Williams for dispositioning.

Mr. J. Knight is recorded as not returned for all items.

Yours truly,

Steve Weinman, Secretary  
 Committee on Nuclear Quality Assurance  
 (212) 705-7025

SW/bwr  
 0161D

LETTER BALLOT # 148

DATE MAILED: August 20, 1987

TO THE MEMBERS OF THE MAIN COMMITTEE OF THE COMMITTEE ON NUCLEAR QUALITY ASSURANCE

BALLOT CLOSING DATE: September 17, 1987

A  
S  
M  
E

1) QUESTION: Proposed Standard NQA-3, Draft 3, Rev. 0  
 Introduction and Basic Requirements: QAD 87-03  
 Supplement SW-1; QAD 87-04 Supplement 3SW-1; QAD 87-05  
 Supplement 11SW-1; QAD 87-06 Appendix 2AW-1; QAD 87-07  
 Appendix 7AW-1; QAD 87-08

2) TYPE OF QUESTION:

- |                      |                                     |                        |                          |
|----------------------|-------------------------------------|------------------------|--------------------------|
| a) PROCEDURE .....   | <input type="checkbox"/>            | e) REVISION .....      | <input type="checkbox"/> |
| b) POLICY .....      | <input type="checkbox"/>            | f) RECONSIDERATION ... | <input type="checkbox"/> |
| c) NEW DOCUMENT..... | <input checked="" type="checkbox"/> | g) PERSONNEL .....     | <input type="checkbox"/> |
| d) ADDENDUM .....    | <input type="checkbox"/>            | h) OTHER .....         | <input type="checkbox"/> |

1) INFORMATION SUBMITTED IS SUFFICIENT TO EVALUATE QUESTION? YES  NO

2) VOTED:

N  
Q  
A

	A	A/C	D	N/V	AB
QAD87-03	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-04	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-05	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-06	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-07	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-08	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(A-Approved A/C-Approved-with-Comment D-Disapproved N/V-Not Voting AB-Abstain)

Dr. Bill Morris (NAC)

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: N. Costanzi

Date: \_\_\_\_\_

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 8703 p 8 c(2)	C	surveilled and surveil should be replaced with more common words	R.K. DANN
QAD 87-03 p 10 3(6) 11	C	clarify that each peer reviewer must document his own findings	M. BELL
QAD 87-03 p 12 (d)	C	Should reference another standard for definition of verification and validation	R. SCHROTKE
QAD 87-05 p 34 9	C	Publications in refereed journals, use of NASI standard methods and ASTM methodology, statistical analyses of variance of the data reproducibility of data, randomness of tests may be more appropriate than some of the factors listed	M. NICOL

Key: D - signifies negative comments: C - signifies s other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell / Ankrum

Date: \_\_\_\_\_

Letter Ballot # <sup>148</sup> NQA-7AD Subject: NQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
Pg. 2, Table of Contents	C	<p>Editorial Under "Introduction" add:</p> <ol style="list-style-type: none"> <li>1. Purpose</li> <li>2. Applicability</li> <li>3. Responsibility</li> <li>4. Definitions</li> </ol>	C. WILLIAMS
Page 2, Table of Contents	C	<p>Editorial #16 "Corrective Actions" should be "Corrective Action"</p>	H. KIRSCHENMAN
Page 5, Organization	C	<p>After "...Supplement IS-1 shall apply." add, "Except that Paragraph 2 is amplified as follows.</p> <p>Criteria shall be established for determining the resources and numbers of personnel required to perform and execute activities that affect quality."</p> <p>(Note: Pg. 13 Last sentence of (d) provides measures for management assessment of resources and personnel but there are no provisions for determining criteria).</p>	C. WILLIAMS

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # NQA-QAD Subject: NQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph  
Reference

<sup>87-03</sup>  
D/C

Comments and/or Recommendations

Disposition of Comments

Pg. 6, paragraph 2(a)

C

After the 4th bullet in paragraph 2(a) add after "responsibilities", "for performance of activities affecting quality and implementing the quality assurance program or any part thereof". (This addition clarifies the intent of what responsibilities are being planned for).

C. WILLIAMS

Pg. 7, paragraph 2(b)(1)

C

The use of the terms, "verification" and "validation" are not clear as to their applicability, i.e., is the application of these terms intended towards software, design control or both?

G. FONES

Pg. 7, paragraph (2)(b)(1)

C

The use of the terms, "storage and retrieval activities" are not clear as to their applicability, i.e., is the application of these terms intended towards quality assurance records, nuclear waste or both?

G. FONES

Key: D - signifies negative comments: C - signifies comments other than negatives

## LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # NQA-QAD Subject: NQA-3, Draft 3, Rev. 0, August 1987Page & Paragraph  
ReferenceB7-03  
D/C

Comments and/or Recommendations

Disposition of Comments

Pg. 7, paragraph (2)(b)(2)

C

After the last sentence add, "Records of the job position analysis shall be documented and available for verification"

G. FONES

Pg. 9, paragraph (d)

C

NQA-2, Part 2.7 is presently in draft form and should not be referenced until fully approved by ASME.

R. Schrotke

Pg. 9, paragraph (d)(1)

C

The terms "verification" and "validation" are used and have different meanings to various individuals. e.g., ANSI/IEEE-ANS-7-4.3.2-1982 defines these terms as:

R. Schrotke

validation. The test and evaluation of the integrated computer system to ensure compliance with the functional, performance and interface requirements.

verification. The process of determining whether or not the product of each phase of the digital computer system development process fulfills all the requirements imposed by the previous phase.

The definition and use of verification above is different than that included in Supplement S-1 of NQA-1. Both terms should be consistent with industry practices.

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # NQA-QAD Subject: NQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference	87-03 D/C	Comments and/or Recommendations	Disposition of Comments
Pg. 9, paragraph (d) Pg. 13, paragraph (d)	C	<p><u>Editorial</u> It appears paragraph (d), "Computer Software Control" on pg. 9, and paragraph (d), "Management Assessments" and (e), "Communications" have been inadvertently misplaced. Paragraph 9 should follow paragraph (c) on page 12, and paragraph (d) and (e) on page 13 should follow paragraph (c) on page 8.</p>	C. WILLIAMS
Pg. 11, paragraph 3 (a)	C	<p>In the 1st paragraph, 1st sentence, after "controlled", delete "and", and after "verified", add "and documented".</p>	M. BELL
Pg. 11, paragraph (b), first paragraph	D	<p>Adopt the wording in Section IV, 1., of the NRC's GTP on Peer Review, with respect to the "applicability of Peer Reviews" after the first sentence to read,</p> <p>1. <u>Applicability of Peer Reviews</u></p> <p>a. A peer review shall be used when the adequacy of information (e.g., data, interpretations, test results, design assumptions, etc.) or the suitability of procedures and methods essential to showing that the repository system meets or exceeds its performance requirements with respect to safety and waste isolation cannot otherwise be established standards and practices.</p>	M. BELL

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # NQA-QAD Subject: NQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference	87-03 D/C	Comments and/or Recommendations	Disposition of Comments
		<p>b. In general, the following conditions are indicative of situations in which a peer review shall be considered:</p> <p>Critical interpretations or decisions will be made in the face of significant uncertainty, including the planning for data collection, research, or exploratory testing</p> <p>Decisions or interpretations having significant impact on performance assessment conclusions will be made.</p> <p>Novel or beyond the state-of-the-art testing, plans and procedures, or analyses are or will be utilized.</p> <p>Detailed technical criteria or standard industry procedures do not exist or are being developed.</p> <p>Results of tests are not reproducible or repeatable</p> <p>Data or interpretations are ambiguous</p> <p>Data adequacy is questionable--such as, data may not have been collected in conformance with an established QA program.</p>	M. BELL

Key: D - signifies negative comments; C - signifies comments other than negatives



LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # NQA-QAD Subject: NQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
		c. A peer review should be used when the adequacy of a critical body of information can be established by alternate means, but there is disagreement within the cognizant technical community regarding the applicability or appropriateness of the alternate means.	M. BELL
Pg. 11, paragraph 3(a)	C	<u>Editorial</u> In the 6th sentence, delete the word "develop".	M. BELL
Pg. 26, section title	C	<u>EDITORIAL</u> Section Title, "Correction Action" should read, "Corrective Action".	H. KIRSCHENMAN
Pgs. 26, 27, entire section	C	Recommended incorporating the entire section on Corrective Action as a supplement to NQA-1.	H. KIRSCHENMAN
Pg. 28, paragraphs (1), (2), and (3)	C	Paragraphs (1), (2), and (3) provide three types of QA record classifications but do not provide criteria to classify these records. An accurate determination for placing a particular QA record into one of the three categories listed in Section 17 cannot be made without providing specific criteria or basis. It is our recommendation	G. FONES

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # NQA-QAD Subject: NQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference	87-03 D/C	Comments and/or Recommendations	Disposition of Comments
		that specific criteria be developed by the Nuclear Waste Subcommittee on Waste Management to determine which specific records should be classified in the three categories listed in Section 17. The criteria should be consistent with the needs of the NRC licensing process.	
Pg. 28, Section 17	C	The previous draft of NQA-3 contained a listing of the minimum QA records for Site Characterization. It is recommended such a listing of these QA records when finalized, be included in the next draft of NQA-3 as a Supplement in lieu of a nonmandatory Appendix. (See Comment for pages 42 and 43).	G. FONES
Pg. 29, paragraph (a)	C	Add the word "technical" in the first sentence to read, "The audit program shall include audits which address the <u>technical</u> quality..."	M. BELL

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # NQA-0AD Subject: NQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
Pg. 30, paragraph 3	D	<p>The definition of geologic repository should agree with the definition in 10CFR 60.1 which states,</p> <p>"Geologic repository" means a system which is intended to be used for, or may be used for, the disposal of radioactive wastes in excavated geologic media. A geologic repository includes: (1) The geologic repository operations areas, and (2) the portion of the geologic setting that provides isolation of the radioactive waste.</p>	P. Bussolini
Pg. 30, paragraph 4	D	<p>The definition for Peer Review limits the Peer Review process to untried or state-of-the-art applications. It is recommended that this definition be revised to the NRC definition in the Peer Review GTP which states: "A peer review is a documented, critical review performed by peers who are independent of the work being reviewed. The peer's independence from the work being reviewed means that the peer, a) was not involved as a participant, supervisor, technical reviewer or advisor in the work being reviewed, and (b) to the extent practical, has sufficient freedom from funding considerations to assure the work is impartially reviewed. A peer review is a documented, critical in-depth critique of assumptions, calculations, extrapolations, alternate interpretations, methodology, and acceptance criteria employed, and of conclusions drawn in the original work. Peer reviews confirm the adequacy of work".</p>	P. Bussolini

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # NQA-QAD Subject: NQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference

BZ-04  
D/C

Comments and/or Recommendations

Disposition of Comments

Pg. 30, paragraph 7

C

Editorial

In accordance with the ANSI/ASME standards writing policy, references to federal regulations are not normally included in a national standard.

P. Bussolini

Pg. 30, paragraph 7

C

In order to be consistent with the definition in 10CFR 60.2, after the word "Repository" in the last sentence add, "but does not include preliminary borings and geophysical testing needed to decide whether site characterization should be undertaken".

P. Bussolini

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # MOA-QAD Subject: MOA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference	87-05 D/C	Comments and/or Recommendations	Disposition of Comments
Page 34, section 9	D	<p>The "factors to be considered" in the first paragraph should include the additional elements described in Section V of the NRC's GTP on Qualification of Existing Data which are:</p> <p>Qualifications of personnel or organizations generating the data are comparable to qualification requirements of personnel generating similar data under the approved QA program.</p> <p>The technical adequacy of equipment and procedures used to collect and analyze the data.</p> <p>The extent to which the data demonstrate the properties of interest (e.g., physical, chemical, geologic, mechanical).</p> <p>The environmental conditions under which the data were obtained if germane to the quality of data.</p> <p>The quality and reliability of the measurement control program under which the data were generated.</p> <p>The extent to which conditions under which the data were generated may partially meet regulations Subpart G.</p>	M. Nicol

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # HQA-QAD Subject: HQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
		<p>Prior uses of the data and associated verification processes.</p> <p>Prior peer or other professional reviews of the data and their results.</p> <p>Extent and reliability of the documentation associated with the data.</p> <p>Extent and quality of corroborating data or confirmatory testing results.</p> <p>The degree to which independent audits of the process that generated the data were conducted.</p>	M. Nicol
Page 33, paragraph 6	C	<p><u>EDITORIAL</u></p> <p>In the 1st sentence it appears "computerized intrumentation" should read, "computerized instrumentation".</p>	M. Nicol
Page 33, paragraph 6	C	<p><u>EDITORIAL</u></p> <p>In the last sentence, "Data shall be suitable..." should read, "Data shall be suitably...".</p>	M. Nicol

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # HQA-QAD

Subject: HQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference

BZ-06  
D/C

Comments and/or Recommendations

Disposition of Comments

Page 35, section 3,  
second paragraph

C

Identify what or who the acronyms  
ASTM, API, EPA, or APHA refer to.

M. Nicol

Page 36, section 4  
first paragraph

C

After the first sentence, "The extent  
and type of review required is a function of..."  
the following should be added:

- 1) The need for special controls and  
surveillance of the test activity.
- 2) The degree in which functional compliance  
can be demonstrated by inspection and test.

M. Nicol

Key: D - signifies negative comments; C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Subcommittee On Nuc. Wst. Mgmt. Submitted by: M. Bell

Date: \_\_\_\_\_

Letter Ballot # HQA-QAD Subject: HQA-3, Draft 3, Rev. 0, August 1987

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
Pg. 39, paragraph (g) Pg. 41, paragraph (f)	D	These sections should be deleted. Cost should not be a factor when providing <u>adequate</u> safety.	F. Hood

Key: D - signifies negative comments; C - signifies comments other than negatives



LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: Gene Basile

Date: 9/24/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03 - 87-08	D	IT IS STILL NOT CLEAR TO ME THAT WE NEED A NEW STANDARD. I BELIEVE WE SHOULD MAKE AN EFFORT INTO FOLDING THESE REQUIREMENTS INTO NQA 1 and NQA 2.	TASK GROUP

Key: D - signifies negative comments: C - signifies comments other than negatives

A/C on QAD 87-03

QAD 87-04

9/14/87

Page 1 of 2

S. A. Bernsen's Comments on  
Letter Ballot No. 148

General Comment

1. Would prefer to see programmatic elements of NQA-3 incorporated into NQA-1 so that only those applicable to the specific scope of NQA-3 need be identified. Examples include:

TASK  
GROUP

2. Quality Assurance Program
  - (a) Planning - introductory paragraph and bullet numbers 1, 4, 6 and 10.
  - (b) Personnel Selection, Indoctrination, Training and Qualification - subparagraphs (2) and (3).
  - (c) Surveillance - subparagraph (1) appropriately modified for scope and all other subparagraphs.
  - (d) Management assessment (note - this is really the (d) on Page 13).
  - (e) Communications - note this is (e) on Page 13.
16. Corrective Actions - good material for a Supplement.
18. Audits - Add to Supplement 18S-1 as appropriate.

2. Believe that some of the content of the proposed duplicates the text of NQA-1 and could be deleted. Examples include:

TASK  
GROUP

- I. Introduction, Section 2 Applicability - subparagraphs (a), (b), (c) and Section 3 Responsibility

3. The NQA Committee should review other aspects of the proposed NQA-3 to determine what additional requirements should be added to NQA-1 to cover future nuclear power plant site investigations. This need not be a high priority item but should be added to the Strategic Plan.

TASK  
GROUP

QAD 87-03

WILLIAMS

1. Page 6 (a), 6th bullet, last word - delete the "s" in "verifications" - it should read "verification".

DANN 2. Page 8 (2), 4th line - delete the "s" in "surveillances"- it should read "surveillance".

SCHROCK 3. Page 9 - This should be item (d) under 3 Design Control. It should be reviewed against the proposed revisions to NQA-1 (currently out for reconsideration ballot) for consistency of terminology and to delete duplication of content. Also do not believe that reference to NQA-2, Part 2.7 is appropriate or necessary. It is somewhat redundant and could delay approval of NQA-3 if NQA-2 Part 2.7 is not approved by the ASME Board Codes and Standards or ANSI.

Also this would be better as a Supplement to Basic Requirement 3 and with minor word modification could be suitable for NQA-1.

- C. WILLIAMS 4. Page 13 - These two items are part of Item 2 QA Program and should be after Page 8.
- WILLIAMS 5. Page 25, last line - Correct spelling from "Supplenent" to "Supplement".
- J. KIRSCHENMAN 6. Page 26 - Change the title from "Correction Action" to "Corrective Action". Also delete or define the term "unusual occurrence" identified in item (b) (4).
- G. FONES 7. Page 28, paragraph (c) (3) - Retention times for nonpermanent records appears to be too long and should be reevaluated. Three years after operation if 15+ years from now. Are audit reports, surveillance reports, etc., really needed for that duration?

QAD 87-04

Recommend addition of the following terms:

P. BUSSOLINI  
readiness review  
unusual occurrence  
data defensibility

## LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality AssuranceSubmitted by: J. M. CANSFDate: 9/8/87Letter Ballot # 148Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
P23, 13(c) QAD 87-03	C	NEXT TO LAST SENTENCE NOT CLEAR. SUGGEST DELETE "SHALL BE USED"	S. Klein
P 33, 3 SW-1, 7. QAD 87-05	C	LAST SENTENCE NOT CLEAR "TO"?	M. Nicol
P39, 2 HW-1, 3(g) QAD 87-07	C	LAST SENTENCE NOT CLEAR "VIEWED WITH PERSPECTIVE"?	F. Hood

Key: D - signifies negative comments: C - signifies comments other than negatives

T.E. Dunn

LETTER BALLOT # 148

ASME

SEP 22 1987

DATE MAILED: August 20, 1987

NUCLEAR SAFETY C & S

TO THE MEMBERS OF THE MAIN COMMITTEE OF THE COMMITTEE ON NUCLEAR QUALITY ASSURANCE

BALLOT CLOSING DATE: September 17, 1987

ASME

1) QUESTION: Proposed Standard NQA-3, Draft 3, Rev. 0  
Introduction and Basic Requirements: QAD 87-03  
Supplement SW-1; QAD 87-04 Supplement 3SW-1; QAD 87-05  
Supplement 11SW-1; QAD 87-06 Appendix 2AW-1; QAD 87-07  
Appendix 7AW-1; QAD 87-08

2) TYPE OF QUESTION:

- a) PROCEDURE .....
- b) POLICY .....
- c) NEW DOCUMENT.....
- d) ADDENDUM .....
- e) REVISION .....
- f) RECONSIDERATION ...
- g) PERSONNEL .....
- h) OTHER .....

1) INFORMATION SUBMITTED IS SUFFICIENT TO EVALUATE QUESTION? YES  NO

2) VOTED: \*

NQA

	A	A/C	D	N/V	AB
QAD87-03	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-04	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-05	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-06	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-07	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-08	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(A-Approved A/C-Approved-with-Comment D-Disapproved N/V-Not Voting AB-Abstain)

\* I find it difficult to believe that much of the prescriptive detail found in the proposed NQA-3 is necessary to implement NQA-1 in the waste repository program; however, in deference to the experience of the Waste Management S.C., I have voted "Approved-with-comment" and hope for the sake of the industry that my fears of over specification are wrong. T.E. Dunn 9/17/87 25

1/6

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: F. E. Dawn

Date: 9/17/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
PG-4, # 2 PG-7, # 1 <del>PG-6, (a) 3<sup>rd</sup></del> <del>Bullet</del>	C	THE TERM "READINESS REVIEW" HAS NOT BEEN DEFINED IN THE TEXT OR SW-1. IN RECENT YEARS THIS ACTIVITY HAS TAKEN A NUMBER OF FORMS - WHAT IS INTENDED IN THIS USE? SUGGEST DELETION.	P. BUSSOLINI
PG-6, (a) 3 <sup>rd</sup> Bullet	C	Delete "necessary and" - editorial redundant term.	C. WILLIAMS
- PG-6, (a) 4 <sup>th</sup> Bullet	C	Delete - Already required in BR-1 of NQA-1	C. WILLIAMS
PG-7, # 2, 2 <sup>nd</sup> sentence	C	Add term "minimum" after "identify".	G. FONES
PG-8, # 2 1 <sup>st</sup> sentence	C	Delete First sentence - use of procedures is required via BR-5.	B. DAWN

Key: D - signifies negative comments: C - signifies comments other than negatives

151

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: F. S. Arnold

Date: 9/17/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
PG-11, FF (a), near bottom of column (1)	C	CLARIFY MEANING OF "DEVELOPMENT ACTIVITIES TO DEVELOP ESTABLISH NEW..."	M. BELL
PG-12, FF 3	C	EXPLAIN WHAT A "BASELINE" ELEMENT IS. OR FIND A NEW TERM.	R. SCHROTKE
(PG-9, FF(1), para(2))	C	CLARIFY MEANING OF THIS ITEM, I.E. SHOULD THIS SAY QA ORGANIZATION OR IS IT REALLY INTENDED TO MEAN ALL PERSONNEL PERFORMING QUALITY ASSURING ACTIVITIES? IN EITHER CASE, WHAT IS ACCEPTABLE?	R. SCHROTKE
PG-18, FF(a), 3rd ballot	C	DELETE TERM "MEASURES" AND REPLACE AS A SPECIFIC REQUIREMENT CONSISTENT WITH NQA-1/2 GUIDELINES. (NEEDS TO BE AN ACTION STATEMENT)	S. KLEIN

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: P. E. Penn

Date: 9/17/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
PG-18, ¶(a), 9 <sup>th</sup> Bullet	C	Delete - This detail belongs in a PROCUREMENT SPECIFICATION OR SHOULD BE MOVED TO, BR-11 ADDITIONS.	S. Klein
PG-23, ¶(a), (b) (c)	C	Delete term "measures" and rewrite to be an ACTION STATEMENT CONSISTENT WITH NQA-1/2 GUIDANCE.	S. Klein
PG-26, ¶(a)(1) 2 <sup>nd</sup> sentence	C	Add term "Root" before "cause".	H. KIRSCHENMAN
PG-26, ¶(b) Point (2) & (4)	C	DELETE "UNUSUAL OCCURRENCES" WHICH ARE CURRENTLY CONTROLLED BY DOB ORDERS OR ODPING MEANING, PARTICULARLY SINCE <sup>THE</sup> CURRENT DOB PROGRAM INCLUDES MORE THAN QUALITY AFFECTING EVENTS.	H. KIRSCHENMAN

Key: D - signifies negative comments: C - signifies comments other than negatives



LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: S. E. Down

Date: 9/17/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
PG-27, 4(b), (4)	C	ADD A BULLET TO REQUIRE ACTION TO PRECLUDE RECURRENCE.	H. KIRSCHENMAN
PG-27, 4(c), (5)	C	CLARIFY - "REMEDIAL" ACTION HAS BEEN USED IN THE PAST TO MEAN THE FIRST ACTION TAKEN; NOT NECESSARILY THE ACTION TO PRECLUDE RECURRENCE.	H. KIRSCHENMAN
PG-28, 4(a)	C	CLARIFY - WHAT <del>MEANS</del> DOES "REMAIN OR SUPPORT DATA" MEAN RELATIVE TO QA RECORDS?	G. FONES
PG-29, 4(c) 2nd sentence	C	DELETE OR CLARIFY WHAT CRITERIA IS USED TO CLASSIFY FINDINGS AND WHO MAKES THIS CLASSIFICATION.	M. BELL

Key: D - signifies negative comments; C - signifies comments other than negatives

412

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: E. S. [unclear]

Date: 9/17/87

Letter Ballot / 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
PG-30, 4	C	ADD TERM "UNPROVEN" BEFORE "STATUS-OF-THE-ART" TO FURTHER CLARIFY MEANING OF PEER REVIEW.	P. BUSSOLINI
PG-33, 4.1, Last sentence	C	SHOULD "COVERING" BE "COPYING"? APPEARS TO BE A TYPO.	M. NICOL
PG-33, 6, 2nd sentence	C	REWRITING - SENTENCE IS NOT CLEAR REGARDING WHEN DATA IS STARTED, ETC.	M. NICOL
PG-33, 7, 1st sentence	C	REWRITING - PROCEDURES CAN NOT CONTROL ANYTHING!	M. NICOL
PG-33, 8, 1st sentence	C	CLARIFY INTENT - THIS APPEARS TO BE ACTION REQUIRED IF DATA WAS COLLECTED WITHOUT A QA PROGRAM IN PLACE. (PART OR <sup>Section</sup> PART 9.?)	M. NICOL
PG-34, Last sentence	C	CHANGE THE "AND" TO "OR" BEFORE THE TERM "DEMONSTRATION". ONE OF THE THREE EXAMPLES SHOULD BE ADEQUATE - NOT ALL THREE.	M. NICOL

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: J. E. Dunn

Date: 9/18/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
PG-35, ¶ 3, 1 <sup>st</sup> Para, last sent.	C	DELETE THE LAST PHRASE - THE DISPOSITION OF TEST FACILITIES IS NOT A QA CONCERN.	M. Nicol
PG-37, ¶ 2, (a), LAST SENTENCE	C	REWRITE THIS SENTENCE REGARDING DESIGN CLASSIFICATION TO CLARIFY THE MEANING.	F. Hood
PG-37, ¶ 2, (a), RESULT SENTENCE	C	CHANGE THE LAST "AND" TO "AND/OR": Q-LIST ITEMS DO NOT HAVE TO BE BOTH SAFETY & WASTE ISOLATION.	F. Hood
/			

Key: D - signifies negative comments: C - signifies comments other than negatives

RECEIVED

LETTER BALLOT # 148  
(Continued)

OCT 12 1987

C. WILLIAMS, JR.

"Not Voting": Neither approved or disapproved, but the total committee voting membership is reduced by one for each "Not Voting" ballot for that particular action.

"Abstain": Neither approved or disapproved, but the total committee voting membership remains unaffected by such action.

3) COMMENTS: PLEASE LIST COMMENTS ON LETTER BALLOT COMMENT FORM

4) NAME (PRINT):

Kenneth E. Good

5) SIGNATURE:

Kenneth E. Good

6) DATE SIGNED:

Oct 5, 1987

7) PLEASE FILL OUT AND RETURN A COPY TO THE ASME NUCLEAR DEPARTMENT  
IN THE ENVELOPE PROVIDED (345 East 47th Street, N.Y., N.Y. 10017).

*xi. Good  
Kenneth*

TASK  
GROUP

Ken Goad:

Comments to Letter ballot #148 Proposed Standard NQA-3, Revision 0

As noted I have approved the letter ballot with comments.

The main committee voted to accept the motion by C. Williams to write a separate standard NQA-3 specifically for— Site Characterization of High-Level Nuclear Waste Repositories.

I still have concerns which are generic to the entire proposed standard. Not too long ago another part of the industry the Reprocessing Facilities (N 46.2) attempted to write a separate standard because of the fact there was major technical differences in a reprocessing facility and a power reactor. It was the judgement of the responsible, authorizing organization for nuclear standards, specifically Quality Assurance Standards that there was no differences in the application of the administrative controls (quality assurance) for a power plant and a reprocessing facility; the identified differences were technical and not programatic. It appears we are confronted with the same type of conditions, but with different players.

It is my understanding that there was great reluctance by the other subcommittees to acceptance any word changes to NQA-1 to accommodate the Waste Repository subcommittee; hence their frustration and proposal for NQA-3. An alterative course of action could have been to write specific Waste Repository supplements and appendices for both NQA 1 & 2. Much of what I see in NQA-3 is a simply rewording of NQA-1 splinkled with some references to NQA-1. NQA-3 is almost a stand alone standard with little or no need for NQA-1. In my opinion there is some confusion in the NQA-3 between technical(specification) requirements and programatic controls similar to the N46-2 activity.

What standard is to be applied to the balance of the repository facilities? Will NQA-3 as the base document be included in the PSAR & SAR for licensing or will NQA-1 ,2, & 3 be used? There is further concern what quality assurance standard is to be levied on the producer of the waste to be placed in the repository; currently DOE has levied NQA-1 on all its contractors. The repository licensee SAR committments will back up to the waste producers.

The main thrust of my concern is the issue of proliferation. We are getting a lot of pressure from the various DOE Laboratory facilities that they to are different and NQA-1 doesn't really apply to them.

Included are some additional comments from M. J. Plodinec who has shared technical responsibility for the waste product form to be produced at Savannah River for the waste repository.

# DON'T SAY IT - WRITE IT

TO: K. E. GOAD  
FROM: M. J. PLODINEC, 2170  
SUBJECT: NQA-3

LOCATION: 703-A  
DATE: 9/24/87

Ken:-

Thanks for the "opportunity" to review NQA-3. I have several comments which I hope will be of some use to you. I'm afraid they are in no particular order. In what follows, I'll try to keep my parochial interests out of mind. However, I must say that if anyone intends to make the DWPF work under this as is, then DuPont should seriously consider abandoning the whole project. I think that this is that bad.

*TASK GROUP*  
(1) The purpose of the document is rather unclear. In particular, why is it necessary to have an ANSI std on as narrow an activity as repository site characterization? This appears to either trivialize the national QA stds, or elevate repository site characterization to a level of importance badly out of line with reality. If a national std is needed, it ought to be more comprehensive, and cover not only site characterization but waste acceptance and disposal as well. It will be much more important to control these other activities.

*TASK GROUP*  
(2) Given the fact, however, that someone perceives a need to write a national std for QA of repository site characterization, then such a std should be focused on the kinds of activities which will be performed, and should only have sections in it which are additive to what is already available. As discussed below, this isn't always the case. Further, it seems that the writer(s) intend the std to cover repository design activities as well. If so, this needs to be spelled out in the applicability section.

*TASK GROUP / R. SCHREIBER*  
(3) It is not clear what is meant by baselining software on p. 9. This appears to be someone's organization-specific jargon, and should be better defined.

*TASK GROUP*  
(4) Has anyone checked to see how this meshes with federal regulations covering mining? It would seem that there is some overlap. If so, this should be explicitly considered. For example, federal mining regulations and inspections could be used to assure personnel safety during exploratory shaft activities. Why impose redundant (at least in intent) requirements?

*TASK GROUP / M. BELL*  
(5) The section on control of scientific investigations is extremely poor. I think this is because it is based on a fundamental paradox. You can only control if you know what the outcome is supposed to be; if you are trying to determine the outcome, then there is no guarantee that the "right" controls have been applied. Where this leads me is to the conclusion that we should focus much more on the use of data, and less on trying to predetermine how much control is necessary to collect the data.

**The ancestor of every action is thought.**

# Goad

This is a fundamentally different view of QA of scientific investigations than the writer(s) have. It leads me still further. This implies that what is most important is knowledge of what was actually done; thus, sections on record keeping of scientific investigations need to be beefed up. In addition, it is clear that the repository projects intend, eventually, to collect a lot of data. This standard never addresses one of the most important parts of the scientific process: using information you have collected for one purpose for something different. By focusing this section on data use rather than data collection, it would be greatly strengthened. For one thing, it would put samples and sample handling, archiving of samples, etc. in a better context.

One more point. Even if no one else agrees with my ideas above, the present section is inadequate because it is not specific to the activities it is intended to cover. Geosciences are not engineering disciplines. They are conducted in a very different manner. This section is an engineer's view of how to control something. It must be made to apply to the geosciences. If the scientific investigations must be controlled this way, then at least have someone familiar with the job write the prescriptions, i.e. this section should simply codify what are considered to be good experimental practices for the discipline.

- TASK GROUP/  
S. KLEIN (6) Samples (p. 18). If there has to be a narrow standard, then make this section specific to the kinds of samples which will, in fact, be taken, i.e. rocks, groundwater, etc. Have a geoscientist or two codify how this is to be done.
- TASK GROUP/  
M. NICOL (7) It is very unclear where the split between Test Control (p. 21) and Scientific Investigations occurs.
- TASK GROUP/  
H. KIRSCHENMAN (8) The Corrective Action and Audits sections seem to add nothing to what is already available. If I'm wrong, then these belong in a higher level standard, because I don't see anything specific to site characterization.
- TASK GROUP/  
G. FONES (9) Records (p. 28). Generally a good section with specific guidance on subject. However, it is marred by this designation of a sample as a record - this abortion is an affront to the language! It is things like this that trivialize QA to outsiders.
- TASK GROUP/  
P. BUSSOLINI (10) The definition of peer review is poorly written. It also needs to better delineate the difference between a technical review and a peer review, in the context of site characterization.
- TASK GROUP/  
P. BUSSOLINI (11) The definitions of data quality, accuracy, etc. are very well done. I'd like to plagiarize them for SRL's manual.
- TASK GROUP/  
M. NICOL (12) On p. 32 the phrase "data processing" is used to mean collection and handling of data. This is an unfortunate usage, because the computer scientists have preempted the term. A better one

Goad

should be found.

TASK Group/  
M. Nicol

(13) Supplement 3SW-1 should be thrown out and re-written. It simply does not match the science being practiced. Get a geoscientist to write something up.



LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: R. F. Hartstern

Date: 9/23/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03, Page 1			
QAD 87-03 General	C	General Comment - Many of the requirements imposed by NQA-3 do not add to the requirements of NQA-1 and don't appear necessary. For example, on page 36, supplement 11SW-1, section 6.0 test results is almost per batium from NQA-1, supplement 11S-1, section 4.0. This is scattered throughout the document and becomes redundant. Suggest NQA-3 be limited to unique or necessary additions associated with site characterization.	TASK GROUP
Page 4, Sect. 1	C	Sect. 1 NQA-3 should use same intro. as NQA-2 & NQA-1 as applicable, i.e. change "defines" to "sets forth the".	C. WILLIAMS
Sect. 1	C	Sect. 1 - move last paragraph to Sect. 2 and begin with "This standard shall be used" to agree with NQA-2.	C. WILLIAMS
Sect. 2	C	Sect. 2 - remove "(a), (b), & (c)". These are redundant to NQA-1 requirements and do not add to the document.	C. WILLIAMS
Sect. 3	C	After 1st sentence add "to the extent necessary, this organization shall invoke the applicable provisions of ANSI/ASME NQA-1 Basic and Supplement Requirements to specify a complete Quality Assurance Program appropriate for specific items or services". Taken from NQA-2. This will require use of NQA-1 where applicable.	C. WILLIAMS

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: R. P. Hartstern

Date: 9/23/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03 Page 7, Sect. 2(B) (1)	C	Lead in sentence not standard terms as NQA-3 Introduction or NQA-1. Should it be "activities affecting quality" to agree with words in NQA-1 2S-4, Section 2.	G. FONES
Page 8, Sect. 2(C)	C	Surveillance is out of place in Section 2. Move to Section 10.	B. DANN
Sect. 2(C) (1)	C	Section (C)(1) - use standard terminology for "activities affecting quality or "activities that affect quality" as used in NQA-1 and NQA-2 and definitions in SW-1, instead of "quality-affecting."	B. DANN
Page 10, Sect. 3(a)	C	Remove "develop" in sentence, "Development activities to <u>develop</u> establish new methods ---"	M. BELL
Page 11, Sect. 3(b)	C	Define or better describe meaning of "minority positions"	M. BELL
Page 12, Sect. 3(d)	C	The amplification, additions and modifications appear to be more than that. IF NQA-2, Part 2.7 is used, it will provide the same direction.	R. SCHROTKE
Page 23, Sect. 13(c)	C	2nd to last sentence is not clear as written.	S. KLEIN
Page 26, Sect. (9) (2)	C	Change to read "Trends determined to be significantly adverse to quality ---"	H. KIRSCHENMAN

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: R. F. Hartstern

Date: 9/23/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-01 Page 37, Appendix 2AW-1, Sect. 2(a)	C	QAD 87-07, page 1 The term "Q" List is not defined in this document. Suggest removing "Q", identify as "Quality-List (Q-List)" or provide definition.	F. Hood
" "	C	The terms "design classification system, graded QA, quality levels and important to safety," appear to be used interchangeably in this Section. This along with the last sentence makes the intent confusing. It also appears you intend to have a "Q-List" based on design classifications resulting in quality levels with grading consideration. Please be more specific.	F. Hood

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: F. & NIBHT

Date: 9/28/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03	C	In last line, the word "will" seems unnecessary	B. DANN
Page 8, para c (2)			
Page 9, para (d)		Object to reference to NQA-2, Part 2.7, which in my opinion is too prescriptive as to historical documentation of prior proven programs.	R. SCHROTKE
Page 13, para (d)		It seems to me that two elements of effective assessments, which are of most importance, are not addressed, viz. - authorization/resources provided by highest level management & - qualification of the assessor(s)	R. LOWDER

Key: D - signifies negative comments: C - signifies comments other than negatives

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LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: F. KNIGHT

Date: 9/26/07

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03 (Cont.)			
Page 23, para 13(c)		Archival storage, a special issue for long-life repositories & at least should be mentioned here. Also the important issue of the sample custody chain is not emphasized here.	S. Klein
QAD 87-04 C NQA-3 Glossary, 2		Definition for "Experiments" - why plural? - Definition does not appear to be uniquely different from Webster's.	P. Bussolini
" 4		Definition for Peer Review - phrase "which performed the work" appears misplaced. Definition is confusing	P. Bussolini

Key: D - signifies negative comments. C - signifies comments other than negatives

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LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: F. KNIGHT

Date: 9/28/02

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-04 (cont.) NQA-3 Glossary, 5.		Definition of Technical Review - No need for text "performed" in definition	P. Bussolini
" " 8		1. Definition of "Data Quality" is too wordy and not to the point. Suggest the definition, "The measure of the accuracy, precision, completeness, representativeness, and comparability of data." 2. Also "data" are plural; therefore "is" in definition is incorrect.	P. Bussolini
QAD 87-05, 9 Page 34	C	Sometimes the factors in the laundry list are not available or measurable except subjectively. Suggest re-word to read, "Factors to be considered, when available and measurable, include:"	M. Nicol

Key: D - signifies negative comments; C - signifies comments other than negatives



LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: F. KNIGHT

Date: 9/28/61

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-06, 11SW-1, 3-	C	In second para, reword so as not to imply that the standards list is all inclusive.	M. Nicol

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: A.L. MacKinney

Date: 9/10/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03 P. 6 para. 2(a)	C	Change the words "affecting organizations" to "affected organizations."	C. Williams
QAD 87-03 p. 28 para. 17(b)	C	Paragraph should read:  "All documents referenced by final reports, except readily available references such as encyclopedias, dictionaries, engineering handbooks, national codes and standards, etc., shall be retrievable from the QA records system."	G. FONES
QAD 87-07 p. 37-41, Section 3	C	I believe that everywhere the word "weighing" appears in this section, it should be changed to "weighting."	F. Hood

Key: D - signifies negative comments: C - signifies comments other than negatives



LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: B. R. Mazo

Date: 9/16/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
Page 7 2(b)(1) QAD 87-03	C	Quality affecting should be replaced with "activities that affect quality" as defined in SW-1 Glossary. This comment applies throughout NQA-3	G. FONES
Page 30 SV-1(4) QAD 87-04	C	Change to read <u>Peer Review</u> - A documented review performed by a qualified person(s) who is independent of the work but who has technical expertise equivalent to those who performed the original work. The peer review should be an organized written critique with emphasis on assumptions, extrapolations and judgements made on work areas that are state of the art. Peer review will be over and above the normal independent technical review.	P. Bussolini
QAD 87-05 Page 33 4.4	C	covering should read converting	M. Nicol
Page 33 7	C	lost sentence change to → of	M. Nicol

Key: D - signifies negative comments: C - signifies comments other than negatives

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LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: B.R. Maze

Date: 9/16/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
Page 33 #8	C	add <u>either</u> before used	M. Nicol
Page 42	C	add Laboratory Calibration procedures Laboratory Analytical procedures Validated Environmental data	G. FONES
43			G. FONES
QAD 87-08			

Key: D - signifies negative comments: C - signifies comments other than negatives

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## LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality AssuranceSubmitted by: M. F. NicolDate: 9/17/87Letter Ballot # 148Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03 1. Pg. 18, Para. 8(c) (1), 2nd Bullet, 2nd Column, 1st complete sentence	C	1. The sentence has something missing. It should read "Such traceability of samples shall be maintained from initial acquisition through final disposition."	S. KLEIN
2. Same as above, - 1st sentence under Sample Traceability	C	2. Sample traceability should also be maintained back to the location of sample origin. I would interpret this sentence to require traceability to a source document.	S. KLEIN
3. Pg. 23, Para. 13(c), 4th sentence	C	3. This sentence is misworded. It should read something like "Measures shall be established to preclude mixing of like samples"	S. KLEIN

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: J.A. Perry

Date: 9/14/87

Letter Ballot / 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
<u>QAD 87-03</u>			
Pg. 10, Para. 2(d)(4)	C	Computer program documentation last bulleted item - delete word "all" just before "formal code reviews" no need to be all inclusive on descriptions.	R. Schrotke
Pg. 10, Para. 2(d)(5)	C	4th line delete word "fully".	R. Schrotke
Pg. 11, Para. 3(a)	C	6th line from bottom of page, left column - delete word "develop".	M. Bell
Pg. 12, Para. 3(c)	C	Title - change word "CONROL" to CONTROL.	M. Bell
Pg. 21, Section 11	C	Last line - delete "NQA-3".	M. Nicol
Pg. 23, Section 13(C)	C	2nd to last sentence - delete last three words - "shall be used".	S. Klein
Pg. 27, Section 16(C)	C	1st sentence, 2nd line, delete word "apparently".	H. Kirschenman
<u>QAD 87-05</u>			
Pg. 33, Section 7	C	Last sentence - change word "to" to word "of".	M. Nicol
<u>QAD 87-07</u>			
Appendix 2AW-1	D	Totally confuses QA Program Grading factors (programmatic) with level of effort associated with activities and items. Confuses & not good guidance.	F. Hood
<u>QAD 87-08</u>			
Appendix 17AW-1	C	General - identifies listings as <u>minimum</u> - which tends to make this more than guidance.	G. Fones

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: E W Rhoads

Date: 8/28/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
P18 & P23 OF QAD 87-03	D	I CAN SEE THE NEED FOR NQA-3 IN CERTAIN AREAS HOWEVER PART 8 (P18) AND PART 13 (P23) ARE NOT NEEDED. THE 85-1 & 135-1 SUPPLEMENTS OF NQA 1 ARE ADEQUATE. THE "ADDITIONS AND AMPLIFICATIONS" INCLUDED HERE ARE MORE ADEQUATELY COVERED BY PROCEDURES WRITTEN FOR THE PROJECT.	TASK GROUP/S. Klein
QAD 87-07	D	THIS IS PROBABLY USEFUL INFORMATION THAT SHOULD BE ISSUED SOMEWHERE. BUT NOT AS PART OF THIS STANDARD. THE REFERENCE TO IT IN QAD 87-03 SHOULD ALSO BE DELETED.	TASK GROUP/F. Hood

Key: D - signifies negative comments: C - signifies comments other than negatives

J

F

QA 87-03 A/c

Shewski

Comments on the NQA-3 draft, Section D on Software control:

Section (d) (2)

? Scheorke

Instead of the words "Software Design, Test and Configuration Management", would suggest "Software Development, Maintenance, Verification and Validation, and Configuration Management". These words are more compatible with Part 2.7.

Section (d) (3)

Believe this is redundant with the Part 2.7 sections 5.1, "Configuration Identification", and 5.2 "Configuration Change Control".

Section (d) (4)

Paragraph 2 - The code history will be available from the traceability that comes from configuration management. Don't understand the need for a "brief description of code history".

Paragraph 4 - User documentation is covered in Part 2.7 Section 6.5. This is redundant.

Paragraph 5 - This information is required by Part 2.7, Section 6.4, "Verification and Validation Documentation". This is redundant.

Section (d) (5)

Believe this section is making a case for "qualification", which is not a part of Part 2.7. Would suggest that it be rewritten in the following manner: "New software shall be qualified for use. This qualification shall determine the ability of the software to provide acceptable results for its particular application, and may be performed by testing, or other applicable methods."

Section (d) (6)

This is redundant with the Part 2.7 section 5.2 "Configuration Change Control".

Section (d) 7

In most cases it does not make sense to retrofit development documentation. The sole purpose of this documentation is to support development. Also, software cannot be verified if this development documentation does not exist. Believe that there is some misunderstanding on the distinction between verification and validation.

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: E.F. TRAINOR

Date: 9/4/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03	D	<p>NQA-1 was revised in 1979 as the result of an industry effort to reduce the amount of QA standards. It would appear that we have not learned anything since 1975 and we are, once again, going to reinvent the wheel. All the material presented in the QAD, can be incorporated into the NQA 1 + 2 standard with the present system. The sub-committee has failed to present a justification for this new standard, and why it can not be incorporated into existing standards as supplements.</p>	TASK Group
5 9723 pg 7 # 6 2	D	<p>Establish what the industry believes the minimum requirements are. As written it will differ from Company to Company - If we are not capable of defining how can we expect the industry to do it?</p>	G. FONES
Pg 8 (21)	C	defer surveillance	P. Bussolini
(C)(3)	D	QA are not responsible to establish or obtain Corrective Action Commitments	B. DANN

Key: D - signifies negative comments: C - signifies comments other than negatives

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LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: E.F. Truman

Date: 9/4/67

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03 Pg 27-7C	D	Reverts. "For receiving quality problems where corrective action have <u>not</u> been effective management shall"	H. KIRSCHENMAN
Pg 27 (C)(3)	C	"Ascertain the problem generic implications;"	H. KIRSCHENMAN
QAD 87-04	D	Incorporate into NQA-1	TASK GROUP
QAD 87-05	D	Incorporate into NQA-1	TASK GROUP ↓
QAD 87-06	D	Incorporate into NQA-1	
QAD 87-07	D	Incorporate into NQA-1	
87-07 pg 37 2(b)	D	PC should establish the required "defensible action"	
Pg 38 3(f)	D	Violates the freedom from cost + schedule requirement of App B	F. Hood
Pg 39 3(g)	D		
QAD 87-08	D	Incorporate into NQA-1	TASK GROUP

Key: D - signifies negative comments: C - signifies comments other than negatives

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LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: James R. Wells

Date: 8/31/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
<p>General</p> <p>QAD 87-03 - 87-08</p>	<p>D</p>	<p>There is not one thing in this standard that does not apply to site investigation for the construction of a Nuclear Power plant. If the wording in NQA-1 &amp; NQA-2 is not sufficient for investigation of site repositories, then it is not adequate for Power plants. The Committee should expend their effort to correct the things that are wrong with NQA-1 &amp; NQA-2, and not develop another standard.</p>	<p>TASK GROUP</p>

Key: D - signifies negative comments: C - signifies comments other than negatives

## LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality AssuranceSubmitted by: C. Williams, Jr.Date: 9/17/87Letter Ballot # 148Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
<u>QAD 87-03</u>			
Page 18, Para. A.1 2 <sup>ND</sup> Bullet	C	Add "shall be maintained" between samples and from, in first sentence	S. Klein
Page 23, Para. C. 5		Revise the next to the last sentence to read as follows: "Measures shall be established to preclude mixing of like samples".	S. Klein
<u>QAD 87-04</u>			
Page 30 Item 4 "PEER REVIEW"	C	Add "beyond the" between <u>or</u> and <u>state</u> .	P. Bussolini
Page 30 Item 7 "SITE CHARACTERIZATION"	C	Delete "and" in last line at the bottom of the page	P. Bussolini

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: C. Williams

Date: 9/17/87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page & Paragraph Reference

D/C

Comments and/or Recommendations

Disposition of Comments

QAD 87-07

Page 37 Para 2a.

C

The last sentence in this Paragraph require clarification as to the intent.

F. Hood

Key: D - signifies negative comments: C - signifies comments other than negatives

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LETTER BALLOT # 148

DATE MAILED: August 20, 1987

TO THE MEMBERS OF THE MAIN COMMITTEE OF THE COMMITTEE ON NUCLEAR QUALITY ASSURANCE

BALLOT CLOSING DATE: September 17, 1987

A  
S  
M  
E

1) QUESTION: Proposed Standard NQA-3, Draft 3, Rev. 0  
 Introduction and Basic Requirements: QAD 87-03  
 Supplement SW-1; QAD 87-04 Supplement 3SW-1; QAD 87-05  
 Supplement 11SW-1; QAD 87-06 Appendix 2AW-1; QAD 87-07  
 Appendix 7AW-1; QAD 87-08

2) TYPE OF QUESTION:

- |                      |                                     |                        |                          |
|----------------------|-------------------------------------|------------------------|--------------------------|
| a) PROCEDURE .....   | <input type="checkbox"/>            | e) REVISION .....      | <input type="checkbox"/> |
| b) POLICY .....      | <input type="checkbox"/>            | f) RECONSIDERATION ... | <input type="checkbox"/> |
| c) NEW DOCUMENT..... | <input checked="" type="checkbox"/> | g) PERSONNEL .....     | <input type="checkbox"/> |
| d) ADDENDUM .....    | <input type="checkbox"/>            | h) OTHER .....         | <input type="checkbox"/> |

1) INFORMATION SUBMITTED IS SUFFICIENT TO EVALUATE QUESTION? YES  NO

2) VOTED:

N  
Q  
A

	A	A/C	D	N/V	AB
QAD87-03	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-04	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-05	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-06	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-07	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QAD87-08	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(A-Approved A/C-Approved-with-Comment D-Disapproved N/V-Not Voting AB-Abstain)

LETTER BALLOT # 148  
(Continued)

"Not Voting": Neither approved or disapproved, but the total committee voting membership is reduced by one for each "Not Voting" ballot for that particular action.

"Abstain": Neither approved or disapproved, but the total committee voting membership remains unaffected by such action.

3) COMMENTS: PLEASE LIST COMMENTS ON LETTER BALLOT COMMENT FORM

4) NAME (PRINT): H. S. TAYLOR

5) SIGNATURE: H. S. Taylor

6) DATE SIGNED: 10-15-87

7) PLEASE FILL OUT AND RETURN A COPY TO THE ASME NUCLEAR DEPARTMENT  
IN THE ENVELOPE PROVIDED (345 East 47th Street, N.Y., N.Y. 10017).

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: H. S. TAYLOR

Date: 10-15-87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page 1 of 5

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03 Page 4 Part I, Introducti	C	The term "readiness review" mentioned in section 2, Applicability, is not defined in Supplement S-1 of NQA-1 nor in Supplement SW-1 of NQA-3. I think it would be helpful to add the definition.	P. Bussolini
QAD 87-03 Page 6, Section 2, QA Program	C	Add an explicit statement that QA program requirements are implemented by procedures.	C. WILLIAMS
QAD 87-03 Page 6, Section 2, QA Program, (a) Planning, 7th ballot	C	What does the term "management review" mean? I am not sure I understand the difference between the four different types of "reviews" mentioned. On page 7 under item (b) (1) you use the words "management assessments". Is this the same thing?	C. WILLIAMS / G. FONES

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: H. S. TAYLOR

Date: 10-15-87

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page 2 of 5

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03 Page 9, item-(d) Management Assessment	C	In the first sentence you mention the organization's "QA Program Plan". Where is this "Plan" defined and where in the standard is this required.	R. SCHROTKE
QAD 87-03 Page 10 Design Control Section 3(a) 4 <sup>th</sup> sentence	C	Independence of the reviewer should be required; but not necessary for the approver.	M. BELL
QAD 87-03 Page 10 Design Control Section 3(a) 6 <sup>th</sup> sentence	C	The sentence that begins "Development activities to <u>develop</u> establish...."; the word "develop" should be deleted.	M. BELL
QAD 87-03 Page 14 Section 4	C	This section is missing from my copy. I assume it is meant to be "Procurement Document Control"	C. WILLIAMS

Key: D - signifies negative comments: C - signifies comments other than negatives

LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality Assurance

Submitted by: H. S. TAYLOR

Date: 10-15-97

Letter Ballot # 148

Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08

Page: 3 of 5

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-03 Page 14 Section 4	C	Procurement Document Cont. at. - Add wording to permit some or all suppliers to be included in the purchaser's, owner's, or prime contractor's QA program rather than be required to have programs of their own.	C. WILLIAMS
QAD 87-03 Page 18 Item 8 1st (a)(1) 2nd bullet	C	Sentence that reads, "Such traceability of samples...."; does not make sense and appears not to be a sentence. Last word of last sentence should be <u>identity</u> , instead of identify.	S. KLEIN
Page 18 Item (a)(1) 3rd bullet	C	I suggest rewording "Archival Samples" to require retention (when feasible) of enough samples to repeat the task or activities or acquire the data for which the samples were collected.	S. KLEIN

Key: D - signifies negative comments: C - signifies comments other than negatives



## LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality AssuranceSubmitted by: H. S. TAYLORDate: 10-15-87Letter Ballot # 148Subject: Proposed New Standard NQA-3, QAD 87-03 thru QAD 87-08Page 4 of 5

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
Continued from page 3		and to provide an adequate backup for documents based on the samples. Storage life of samples should be considered. Repeatability can change with circumstances.	
QAD 87-03 Page 19 Section 9	C	In section 9, Control of Processes, you could give examples of activities, such as in-situ stress/strain determination, to bring NQA-1 test closer to data collection activities.	C. WILLIAMS
QAD 87-03 Page 26 Section 16	C	Title of section should be " <u>Corrective Action</u> ".	H. KIRSCHENMAN

Key: D - signifies negative comments: C - signifies comments other than negatives

## LETTER BALLOT COMMENT FORM

Committee: Nuclear Quality AssuranceSubmitted by: H. S. TAYLORDate: 10-15-87Letter Ballot # 148Subject: Proposed New Standard NOA-3, QAD 87-03 thru QAD 87-08

Page 5 of 5

Page & Paragraph Reference	D/C	Comments and/or Recommendations	Disposition of Comments
QAD 87-04 Page 30 Appendix SW-1	C	Alphabetize definitions. Add definition of "readiness review."	P. Bussolini
QAD 87-05 Page 31 Section 6, line 16	C	The word "suitable" should be suitably.	P. Bussolini
QAD 87-06 Page 36 Section 7. Test Results	C	Add precision requirements and potential sources of errors to the list of Section 7.	M. Nicol
QAD 87-07 Page 39 Subsection 3(g)	C	I agree that overspecification of QA requirements should be avoided but economics (Subsection 6(f)) should not be considered in establishing minimal QA requirements. I suggest deletion of economic parameters from this appendix.	F. Hood

Key: D - signifies negative comments: C - signifies comments other than negatives