



**Department of Energy**  
Washington, DC 20585

March 8, 1999

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**OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM)  
REVIEW AND ACCEPTANCE OF THE NAVAL NUCLEAR PROPULSION  
PROGRAM (NNPP) QUALITY ASSURANCE PROGRAM**

Reference: Ltr, Clark to Curtis, dtd 2/5/99

Attached, for your information, is the referenced letter (OCRWM to NNPP) which documents the OCRWM acceptance of the NNPP Quality Assurance Program. The OCRWM review was conducted utilizing a NNPP prepared matrix which shows where, in NNPP implementing procedures, the elements of the Nuclear Regulatory Commission Review Plan for High-Level Waste Repository Quality Assurance Program Descriptions are met.

Should you have any questions, please call Robert W. Clark at (702) 794-5583.

*Dwight E. Shelor*  
Dwight E. Shelor, Acting Director  
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**OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM) REVIEW  
AND ACCEPTANCE OF THE NAVAL NUCLEAR PROPULSION PROGRAM (NNPP)  
QUALITY ASSURANCE (QA) PROGRAM**

The Memorandum of Agreement (MOA) dated September 2, 1998, between the Director, OCRWM and the Director, NNPP requires OCRWM to review and accept the NNPP QA program. The purpose of this letter is to document the OCRWM acceptance of the NNPP QA program.

It should be noted that the NNPP QA program is used for all NNPP work. A portion of the work performed under NNPP is related to the OCRWM acceptance and disposal of naval Spent Nuclear Fuel (SNF). This work includes characterization of naval SNF, procurement of packaging hardware to be used at NNPP facilities, and operations at NNPP facilities to support the packaging and shipment of naval SNF to a geologic repository. Thus, NNPP is a generator of SNF and not directly involved in OCRWM's mission of site characterization, design, and management of a potential disposal site for the nation's SNF and high-level radioactive waste. This was taken into consideration during our review.

This review was conducted in two phases. In the first phase NNPP gave a detailed technical overview of its program. From the presentations it was clear that NNPP has a very strong technical Quality Assurance/Quality Control program. It was also noted that the subject QA program has been in existence for over 50 years and many of the quality elements have been borrowed by the nuclear industry and the Nuclear Regulatory Commission (NRC) in the development of QA standards and regulations, including 10 CFR 50 Appendix B. Although, this first phase of the review resulted in confirmation that the NNPP QA program meets the "key" requirements of 10 CFR 50 Appendix B and the OCRWM Quality Assurance Requirements and Description (QARD), the NNPP QA program and the QARD differ in the level of detail they use to prescribe how to meet these key requirements. Recognizing these differences, OCRWM suggested that the NNPP QA program also be reviewed against the criteria of the NRC Review Plan for High-Level Waste Repository Quality Assurance Program Descriptions, since the NRC Review Plan was one of the bases upon which the QARD was written. NNPP agreed to this approach.

D. I. Curtis

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During the second phase of the review, the OCRWM Office of Quality Assurance team reviewed the NNPP's prime contractors QA programs using a matrix based on the NRC Review Plan. The matrix documents where NNPP's prime contractors' (Bettis Atomic Power Laboratory (Pittsburgh & Idaho), Knolls Atomic Power Laboratory, Westinghouse Plant Apparatus Division and Machinery Apparatus Operation) QA implementing documents meet the applicable Review Plan criteria. The OCRWM review consisted of sampling the implementing documents identified in the matrix. The review indicated that the QA programs meet the criteria of the NRC Review Plan with the exception that no commitment is provided to comply with American Society of Mechanical Engineers Quality Assurance Standard NQA-1 (Review Plan element 2.2). OCRWM concludes that this is acceptable given the nature and scope of the NNPP work, that NNPP has an established, proven QA program; that the intent of NQA-1 is met; and that NNPP is responsible, by law, for establishing the standards for the conduct of NNPP work (Executive Order 12344 as prescribed by Public Law 98-525 [42 U.S.C. 7158]). In conclusion, OCRWM considers the NNPP QA Program acceptable for NNPP and its contractors' activities related to OCRWM acceptance and eventual disposal of naval SNF.

Should you have any questions, feel free to call me at 702-794-5583.



Robert W. Clark, Acting Director  
Office of Quality Assurance

cc:

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