



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JUL 18 1988

MEMORANDUM FOR: The Record

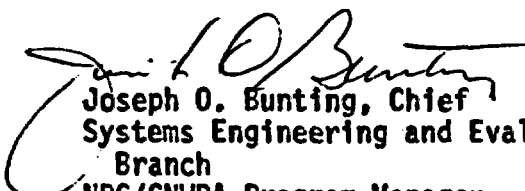
FROM: J. O. Bunting, Chief  
Systems Engineering and Evaluation  
Branch  
NRC/CNWRA Program Manager

SUBJECT: MEETING WITH RESEARCH JULY 12, 1988

On July 12, 1988, a meeting was held in Mr. Browning's office to discuss the attached Note from me to Mr. Browning concerning the impact of the delays in getting the research projects approved and money authorized to the Center. Attending were Messrs. Costanzi and Silverberg from Research and Ballard, Youngblood, Browning and myself.

After discussing the contents of the note, the following agreements were reached:

1. The additional \$450,000 of year two Research funds will be transferred to the Division of Contracts immediately.
2. Research, in coordination with the Division of High Level Waste, (Mr. Ballard) will develop within two weeks, the comments on the three outstanding research project plans submitted to NRC by the Center. The comments will contain : a) sufficient detail to redirect the Center to prepare revised project plans. This will be accomplished without awaiting the return of Mr. Birchard, the project manager for the Geochemistry project; b) sufficient specific redirection to enable the Division of Contracts to direct the contractor to begin work on the early tasks without awaiting receipt of the revised project plan.
3. Mr. Costanzi will discuss the year two (FY89) \$500,000 required to meet the total years one and two Research funding level for the Center previously established. It is Mr. Browning's and Mr. Bunting's understanding that Mr. Arlotto agreed to meet this commitment in his meeting with them on July 1, 1988. If Mr. Costanzi finds that Mr. Arlotto does not agree, Mr. Costanzi will call Mr. Browning who will then take action with Mr. Arlotto.

  
Joseph O. Bunting, Chief  
Systems Engineering and Evaluation  
Branch  
NRC/CNWRA Program Manager

Enclosure 2

8807280236 880726  
PDR WASTE  
WM-11 PDC

dupe  
~~8807280204~~

JUL 18 1988

Mr. John Latz, President  
Center for Nuclear Waste  
Regulatory Analyses  
P.O. Drawer 28510  
6220 Culebra Road  
San Antonio, TX 78284

Dear Mr. Latz:

We have reviewed the draft version of the "Center Quality Assurance Manual" (Manual) submitted to NRC on June 16, 1988. We have determined that the most effective way to proceed is a four step process:

Step 1 is the completion of the mandatory revisions provided in Enclosure 1 and the readdressing of Nancy Voltura's comments, as discussed below. When these two activities have been completed, you will have NRC's approval to implement the Manual as the Center's interim Quality Assurance (QA) Manual. I am sending Mark Delligatti of my staff to San Antonio to meet with you during the week of July 18 to assist you and your staff in implementing the mandatory revisions and to discuss the rest of the four step process.

Enclosure 2 contains an analysis by Nancy Voltura of your comment resolution document which reflected the Center's attempt to resolve her comments on the previous draft Manual submitted in March. Ms. Voltura disagrees with you on the status of the resolution of many of her comments. You must reconsider all of the comments for which Ms. Voltura disagrees with your resolution. In particular, your responses must track with her references. If she has referenced NQA-1 or the QA Standard Review Plan in her comment, your resolution should respond in terms of the requirements cited in those documents. If you have responded that a comment has been addressed in a different section of the Manual, cite the specific place and explain why the information there resolves the comment. If your staff does not understand a particular comment made by Ms. Voltura, either originally, or in response to your comments, please contact her and keep Mr. Delligatti informed. You will find that in making some of the mandatory changes required by this memorandum you will also resolve some of Ms. Voltura's comments. Please understand that you are not directed to adopt each of Ms. Voltura's comments. However, for those you believe to be inappropriate, you must document your rationale.

Step 2 will involve the development of a new Chapter 19 for the Manual

Enclosure 3

~~8807210286~~ 4pp.

CC	:NMSS/HLSE	:NMSS/HLSE	:	:	:	:
AME	:MDelligatti	:JOBunting	:	:	:	:
DATE	:06/30/88	:	:	:	:	:

which will delineate the decision support criteria to be used by the Center. These criteria will clearly delineate and document a hierarchic system of management decision support. These decision support criteria will be used to determine the appropriate management level for recommendations, approvals, and changes for all activities effecting quality. We endorse the approach to readiness reviews discussed in NUREG/CR 4271 and the Decision Support System discussed in the Division of High-Level Waste Management (DHLWM) Internal QA Plan. Recommended Step 2 completion date: August 6, 1988.

Step 3 will be the revision of the Manual to incorporate the decision support process, as described in Chapter 19, into each of the previous manual chapters and any additional mandatory requirements which may result from our review of your second round resolution of Ms. Voltura's comments. The incorporation of the decision support system will require you to clearly identify the managers with decision authority along with the appropriate chains of command and responsibility. The adoption of a decision support system will provide CNWRA (and in appropriate cases, NRC) decision makers with the tool needed to determine, not only if the information provided to them is correct, but whether it is the information they need to make particular decisions. Recommended Step 3 completion date: September 21, 1988.

Step 4 will be the formal approval of the revised manual by NRC. Recommended Step 4 completion date: October 11, 1988.

It is our understanding that the Manual shall take precedence over the SwRI Nuclear QA Program Manual (NQAPM), whenever CNWRA work is to be carried out by SwRI. We understand this to mean that before any work is carried out by SwRI a determination will be made by the Center, as to whether or not there is an existing procedure in place in the NQAPM. If so, a determination will be made by the CNWRA as to whether that procedure meets the requirements of the CNWRA QA program and Manual. If you determine that the procedure is acceptable, it will be adopted as a CNWRA Technical Operating Procedure (TOP) or Quality Assurance Procedure (QAP). If not, a new procedure will be developed by the CNWRA. In either case, the procedure would be submitted to NRC for approval. It is also our understanding that while work is being done at SwRI, all aspects of the work will be carried out according to the Manual. Be sure to appropriately address those of Ms. Voltura's comments which relate to this, making it clear that there will not be situations in which the SwRI QA Manager has control or precedence over you or the Manual. If your understanding of the status of the NQAPM is at all different from the discussion in this paragraph, please inform me immediately, if not the Manual should be revised to reflect our understanding.

DFC	:NMSS/HLSE	:NMSS/HLSE	:	:	:	:	:
NAME	:MDelligatti	:JOBunting	:	:	:	:	:
DATE	:06/10/88	:	:	:	:	:	:

Based on our telephone conversation last week, I understand that you agree with the four step approach outlined in this letter, and that the mandatory changes cited in Enclosure 1 are appropriate to the work performed by the Center.

Sincerely,

Joseph O. Bunting, Chief  
Systems Engineering and Evaluation Branch  
NRC CNWRA Program Manager  
Division of High-level Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Enclosures: As Stated

cc: Mary Mace  
James Kennedy  
Nancy Voltura

DISTRIBUTION

Central Files  
RBrowning, HLWM  
RBallard, HLTR  
MDelligatti, HLSE  
JPearring, HLTR  
Wott, RES

HLSE R/F  
BJYoungblood, HLWM  
BStiltenpole, HLSE  
PAItomare, HLSE  
SCoplan, HLOB  
MMace, DC

NMSS RF  
JBunting, HLSE  
SFortuna, HLSE  
PJustus, HLTR  
JCook, SGTR

Please see previous concurrence.

DFC	:NMSS/HLSE	:NMSS/HLSE	:	:	:	:	:
NAME	:MDelligatti	:JOBunting	:	:	:	:	:
DATE	:06/30/88	:	:	:	:	:	:

Based on our telephone conversation last week, I understand that you agree with the four step approach outlined in this letter, and that the mandatory changes cited in Enclosure 1 are appropriate to the work performed by the Center.

Sincerely,

Joseph O. Bunting, Chief  
Systems Engineering and Evaluation Branch  
NRC CNWRA Program Manager  
Division of High-level Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Enclosures: As Stated

cc: Mary Mace  
James Kennedy  
Nancy Voltura

FC	: NMSS/HLSE	: NMSS/HLSE	:	:	:	:
AME	: MDelligatti	: JOBunting	:	:	:	:
ATE	: 06/19/88	: 7/19/88	:	:	:	: