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SEP 23 1987

MEMORANDUM FOR: Thomas L. King, Acting Chief
Advanced Reactor & Generic Issues Branch
Division of Regulatory Applications
Office of Nuclear Regulatory Research

FROM: Michael J. Bell, Deputy Director
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: REVIEW OF ASME NUCLEAR QUALITY ASSURANCE MAIN
COMMITTEE BALLOT

In accordance with your August 24, 1987 memorandum, we have reviewed the proposed standard, NQA-3, "Quality Assurance Program Requirements for the Collection of Scientific and Technical Information for Site Characterization of High-Level Nuclear Waste Repositories." We support the concept of the NQA-3 consensus standard for the high-level waste repository program however, we have certain issues that must be resolved prior to our full endorsement of the standard. Consequently, we vote negative on the standard pending resolution of these issues. Our comments are noted on the NQA-3 Letter Ballot Comment Form.

If you desire any clarification of these comments, or if we can provide any additional assistance, please feel free to contact me (X74200) or Bill Belke (X74798), the principal reviewer of this standard.

Michael J. Bell, Deputy Director
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure:
As stated

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PDR WASTE PDR
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ENCLOSURE 3

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

Pgs. 26, 27, entire section	C	Recommended incorporating the entire section on Corrective Action as a supplement to NQA-1.	
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 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).	
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..."	

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	8708 D/C	Comments and/or Recommendations	Disposition of Comments
Pg. 43, entire appendix 17AW-1	D	We do not totally agree with the retention times for many of the records listed. Many of these records could be helpful if the retrievability had to be performed, or may be of archival interest. Examples of these records include: logs, maps, and geophysical data in support of subsurface correlation; groundwater and hydrologic regime maps and data (including analysis results); isopach maps and supporting data; and hydrogeologic test results and data. Many of the radionuclides present in the waste are dangerous for thousands of years; consequently, if the subsurface water supply was contaminated with these radionuclides, these records might be helpful in containing or mitigating the contamination. (See comment for Pg. 28 Sections (1), (2), and (3).)	
Pg. 43, paragraph (2)	C	Qualification of existing data reports should be a QA record and listed under this section.	

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