

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

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## NONCONFORMANCE REPORT

Project No. 20-5708-761

NCR No. 96-07

### PART 1: DESCRIPTION OF NONCONFORMANCE

Quality Assurance Procedure-002, Review of CNWRA Documents, Reports and Papers, Table 1, Review Requirements Matrix shows that "Journal Articles, Proceedings, Conference Papers" require a Technical or Peer review and a Programmatic review.

Contrary to this requirement, the following documents were not subjected to formal QAP-002 requirements before being sent out to the NRC: "Total System Performance Assessment Focus Topic: Infiltration and Deep Percolation," plus others (Transmitted as IM 20-5708-761-650 May 21, 1996) and "Total System Performance Assessment Focus Topic: Dilution" (Transmitted as IM 20-5708-761-640 June 24, 1996). These two documents were identified during preparation for the annual CNWRA QA Audit and did not have supporting review documentation required by QAP-002.

Initiated by: Bruce Mabrito

*Bruce Mabrito*

Date: July 11, 1996

### PART 2: PROPOSED DISPOSITION AND CORRECTIVE ACTION

#### Disposition:

Contrary to QA findings, the two items identified do not constitute a nonconformance

#### Basis of Disposition:

QAP-002 does not explicitly apply to these two deliverables because they are viewgraph presentations. These presentation materials were reviewed by both CNWRA and NRC management. In addition, these presentation material were drawn directly from the letter report "Input to Audit Review of DOE TSPA-95 (IM 5708-761-630) which Action to correct nonconformance: was reviewed in accordance with QAP-002.

Target date for completion: 7/12/96

Proposed by:

*R. Baca*

Date:

7/12/96

### PART 3: APPROVAL

Element Manager:

*R. Baca*

Date:

7/12/96

Director of QA:

*Bruce Mabrito*

Date:

7/19/96

#### Comments/Instructions:

*Accept R. Baca Disposition and corrective action statement.*

### PART 4: CLOSE OUT

Comments:

*N/A*

Distribution: Original - R. Baca, Affected EM  
B. Mabrito  
Other Element Managers  
B. Sagar  
H. Garcia  
R. Brient

Verified by:

*Bruce Mabrito*

Date:

7/19/96

Contrary to QA finding, the two items identified do not constitute a nonconformance.

QAP-002 does not explicitly apply to these two deliverables because they are viewgraph presentations. These presentation materials were reviewed by both CNWRA and NRC management. In addition, these presentation material were drawn directly from the letter report "Input to Audit Review of **DOE** TSPA-95 (IM **5708-761-630**)" which was reviewed in accordance with QAP-002.

INPUT ON NCR No. 96-07

Following are several points for consideration in resolving the different perspectives on the subject NCR.

1. It is arguable whether the Description of Nonconformance is correct in the first place. The subject items were used in presentations. Although the term "presentations" is included in one of the subheadings of Table 1 of QAP-002, the Document Type field clarifies that "Journal articles, proceedings, conference papers" are intended to be covered. The implication is that slides, viewgraphs, poster boards, and the like are not subject to the provisions of QAP-002. Certainly if an EM wanted to have them reviewed using QAP-002, there is no prohibition on doing so; neither is there a requirement.
2. In the past, we debated writing QAP-002 to address Intermediate Milestones (IM) and Major Milestones (MM). We decided to not do this because "IM" and "MM" are contractual terms that do not necessarily convey the quality-sensitive attributes of the items (such as importance to safety, waste isolation, or licensing). Instead a review requirements matrix was introduced that establishes requirements according to document type, which (at least to some degree) conveys the quality-sensitive nature of the item.
3. The argument made in item 2 notwithstanding, it is interesting that the milestone-type construct remains with regard to editing requirements (see section 4.1.2). QAP-002 requires that all IMs and MMs "shall be edited."

*provided by W. PATRICK  
7/19/96*

*DSW 7/19/96*

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

## QUALITY ASSURANCE PROCEDURE

Proc. QAP-002

Revision 5, Cha 1

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**Table 1. Review requirements matrix**

Document Type	Review Type	Technical/Peer	Concurrence	QA	CNWR Programmatic	Format
<b>Technical Documents</b>						
Reports on Research and Technical Assistance, NUREG/CRs		X			X	X
Semi-Annual Research Reports		X			X	X
<b>RPD</b>						
RPD Documents		X	X		X	X
<b>Papers/Presentations</b>						
Journal Articles, Proceedings, Conference Papers		X			X	
<b>Guidance Documents</b>						
Draft Technical Positions, Rulemakings, and Regulatory Guides		X			X	X
<b>QA Program Documents</b>						
CQAM, QAPs			X	X	X	X
TOPs		X		X	X	X
<b>Administrative/Fiscal Documents</b>						
Operations Plans, Work Plans		X	X	X	X	X
Project Plans, Test Plans		X		X	X	X
Administrative Procedures			X	X	X	X
Program Manager's Periodic Reports			X		X	X

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# Center for Nuclear Waste Regulatory Analyses

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May 21, 1996

Contract No. NRC-02-93-005

Account No. 20-5708-761

U.S. Nuclear Regulatory Commission

ATTN: Mr. Rex Wescott

Division of Waste Management

TWEN Mail Stop (7 D 13)

Washington, DC 20555

Subject: Transmittal of Intermediate Milestone 5708-761-650: Support  
NRC/DOE PA Technical Exchange Meeting

Dear Mr. Wescott:

As part of the work performed under the Total-System Performance Assessment (TSPA) and Technical Integration KTI, the PA Element has prepared a set of presentations that will be given at the upcoming NRC/DOE Technical Exchange Meeting on TSPA. The presentations cover the five focus topics from the audit review of the recent DOE TSPA-95 report: (i) temperature and relative humidity analyses, (ii) container lifetime and source term models, (iii) infiltration and deep percolation analyses, (iv) TSPA model abstractions, and (v) groundwater dilution calculations. These presentations were prepared by the KTI teams and have been reviewed by CNWRA and NRC management. We believe that information contained in these presentations will provide constructive commentary on the models, approaches, and assumptions used in the DOE TSPA-95 report.

Hard copies of the subject five presentations are attached and are submitted to fulfill IM 20-5708-761-650. In addition to this presentation material, we plan to prepare a trip report after the Technical Exchange to summarize the key points and agreements regarding TSPA methodology issues.

If you have any questions on this deliverable, please call me at (210) 522-3805.

Sincerely yours,

*Mark A. Jorgensen FOR RG Baca*  
Robert G. Baca, Manager  
Performance Assessment

RGB/cg

Rev. Letter/DOE/NRC.let

cc: J. Linehan  
S. Fortuna  
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# **TOTAL SYSTEM PERFORMANCE ASSESSMENT FOCUS TOPIC: INFILTRATION AND DEEP PERCOLATION**

## **Participants**

**Stuart A. Stothoff and A.C. Bagtzoglou**

**N. Coleman (NRC)**

**Center for Nuclear Waste Regulatory Analyses**

**Presented by  
Stuart A. Stothoff**

**May 22, 1996  
Las Vegas, NV**

# **AREA OF CONCERN: CALCULATION OF TEMPERATURE AND RELATIVE HUMIDITY IN TSPA-95**

**Collaborators**

**R. Green, G. Rice, G. Ofoegbu**

**R. Wescott, J. Pohle (NRC)**

**Center for Nuclear Waste Regulatory Analyses**

**Presented by  
Randy Manteufel**

**May 22, 1996  
Las Vegas, NV**

# Center for Nuclear Waste Regulatory Analyses

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June 24, 1996  
Contract No. NRC-02-93-005  
Account No. 20-5708-761

U.S. Nuclear Regulatory Commission  
ATTN: Mr. Rex Wescott  
Division of Waste Management  
TWFN Mail Stop (7 D 13)  
Washington, DC 20555

Subject: Transmittal of Intermediate Milestone 5708-761-640: Support for  
ACNW Meeting-Presentations

Dear Mr. Wescott:

As part of the work performed under the Total-System Performance Assessment (TSPA) and Technical Integration KTI, the PA Element has prepared two presentations that will be given at the Advisory Committee on Nuclear Waste (ACNW) meeting on TSPA. The presentations provide an overview of results for two focus topics from the audit review of the DOE TSPA-95 report: (i) TSPA model abstractions and (ii) groundwater dilution calculations.

Hard copies of the two presentations are attached and are submitted to fulfill IM 20-5708-761-640. In addition to this presentation material, we reviewed and commented on the NRC presentation materials for the ACNW meeting.

If you have any questions on this deliverable, please call me at (210) 522-3805.

Sincerely yours,



Robert G. Baca, Manager  
Performance Assessment

RGB/cg

File: Matter\ACNW96.let

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CNWRA Element Managers





# **TOTAL SYSTEM PERFORMANCE ASSESSMENT FOCUS TOPIC: DILUTION**

## **Participants**

**R.G. Baca, G.W. Wittmeyer, D.A. Turner**

**N. Coleman (NRC)**

**Center for Nuclear Waste Regulatory Analyses**

**Presented by  
Robert G. Baca**

**June 26, 1996  
Rockville, MD**