

*enclosed  
in packet*

*10/19/87*

Mr. James Knight, Director  
Siting, Licensing and Quality  
Assurance Division  
Office of Geologic Repositories  
U.S. Department of Energy  
RW-20  
Washington, DC 20585

Dear Mr. Knight:

Your letter of August 28, 1987 provided responses to the NRC March 9, 1987 Request for Additional Information (RAI) on the BWIP QA Plan, Revision 1, and the BQARD, Revision 0. Also provided were the BWIP QA Plan, Revision 3, and BQARD, Revision 3. The BWIP and BQARD were subsequently approved by the DOE as indicated in the September 1, 1987 DOE memorandum from you to John Antonnen. The purpose of this letter is to transmit the NRC staff comments on the BWIP and BQARD documents and responses to NRC's March 9, 1987 RAI, which are in the following enclosures:

- Enclosure 1 Request for Additional Information based on NRC review of BWIP Responses to NRC's RAI of 3-9-87
- Enclosure 2 Request for Additional Information based on NRC review of BWIP QA Plan vs. NRC Review Plan
- Enclosure 3 Request for Additional Information based on NRC review of BQARD Responses to NRC's RAI of 3-9-87 and BQARD Revision 3

The BWIP QA Plan was reviewed against the NRC Review Plan to assure Revision 3 to the BWIP QA Plan did not reduce any of the former commitments contained in the BWIP QA Plan. As a result of the review against the NRC Review Plan, eleven questions were generated (Enclosure 2) which require clarification.

It is our understanding from the August 19, 1987 meeting in DOE Headquarters in Washington, DC, the OGR/B-3 QA Plan will undergo a substantive revision to incorporate the Director's Statements on "Managing for Quality" and "Quality Assurance." We have some general comments on these statements which are being provided to you in a separate letter. Also, the OGR/B-3 revision may affect the BQARD and BWIP documents. However, in any case, the NRC staff believes the comments in Enclosures 1, 2, and 3 should be considered for the BQARD and BWIP documents and a response to the NRC comments is requested.

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Questions on the enclosed comments or arrangements for a meeting between our staffs should be referred to Sandra Wastler of my staff on 427-4780.

Sincerely,

**Original Signed By:**

John J. Linehan, Section Leader  
Projects Section, Operations Branch  
Division of High-Level Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Enclosures:  
As stated

cc: P. Saget, (BWIP)