

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

1/2

NONCONFORMANCE REPORT

Project No. 20-3704-061

NCR No. 91-01

PART 1: DESCRIPTION OF NONCONFORMANCE

CNWRA 90-008 "Geochemical Natural Analogs Literature Review" document sent to NRC 6/6/91 had no objective evidence of any type indicating reviews. QAP-002, Rev. 1, Table 1, page 5 of 15, shows that final reports shall receive format, technical, programmatic and QA reviews. NOTE: The "Draft" document (dated 10/90) did receive all required reviews, and those reviews are available as objective evidence in the Quality Assurance Records location.

Initiated by: Bruce Mabrito 

Date: 6/7/91

PART 2: PROPOSED DISPOSITION AND CORRECTIVE ACTION

(W. Patrick)

Response due *6/24/91*

Disposition:

No action required.

Basis of Disposition:

See attached.

Action to correct nonconformance:

None required.

Target date for completion: N/A

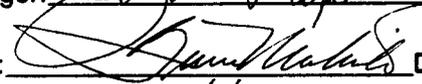
Proposed by: 

Date: 6/11/91

PART 3: APPROVAL

Element Manager: John Russell

Date: 6/11/91

Director of QA: 

Date: 6/11/91

Comments/Instructions:

*NCR 6/11/91
This NCR shall be sent to all Center Directors, EMS, PIs
for their information. 6/11/91*

PART 4: CLOSE OUT

Comments:

NONE

Verified by: 

Date: 6/11/91

2/2

Attachment to NCR No. 91-01

PART 2: PROPOSED DISPOSITION AND CORRECTIVE ACTION

Basis of Disposition:

The draft document "Geochemical Natural Analogs Literature Review" (CNWRA90-008) by E.C. Pearcy and W.M. Murphy was transmitted to the NRC October 30, 1990, for review and comment, in accordance with contractual provisions. As noted in Part 1 of this NCR, the draft document received appropriate format, technical, programmatic, and quality assurance reviews prior to transmittal to NRC. All such comments were appropriately resolved and documented in accordance with QAP-002.

NRC comments were transmitted to the document authors on an informal basis. The authors responded to these comments by: making relatively minor changes to the text, adding several references, and including associated summaries in the Annotated Bibliography of the report. In addition, certain other editorial changes and clarifications were made to the text of the document at the volition of the authors. None of these changes either individually or collectively changed the basic substance, intent, or conclusions of the document. Consequently, the final report is substantively the same as the draft report.

Based on the preceding considerations, it was concluded that another review of the document was not required under QAP-002. This decision is consistent with CNWRA practice developed over the past three years (for example, the publication of final Research Quarterly Reports without further review following NRC comment). The basic principles applied are as noted below.

- In general, a draft document which has been modified in response to review comments (whether generated by CNWRA, NRC, or others) need not be submitted to a second review under QAP-002.
- If comments on a draft document (a) change the basic substance, intent, or conclusions of the document, or (b) so change the format of the document as to alter the logical development of the material, it shall be submitted for another round of review in accordance with QAP-002.
- Editorial corrections and revisions of art work need be reviewed by the author(s), only.

In keeping with the provisions of QAP-002, the Element Managers are responsible for determining when a second review is required.