

# memorandum

DATE: JUL - 7 1986

REPLY TO: RW-24  
ATTN OF:

86 JUL -8 PM:01

SUBJECT: HQ Review of Basalt Waste Isolation Division (BWID) QA Plan

TO: Lee Olson, BWID

We have completed our review of the Basalt Waste Isolation Division (BWID) QA Plan, Revision 1, which was transmitted to us by your letter of April 15, 1986. We find your plan acceptable with the exceptions indicated below and approve it for use.

We do not fully agree with the "Clarifications/Exceptions to the NRC Review Plan" set forth in Appendix A to the BWID QA Plan. We feel you have in some instances misunderstood the Review Plan requirements and that the clarification/exceptions are unneeded; in other cases we disagree with the exceptions you proposed to take. Our comments on Appendix A to you QA Plan are attached and these should be incorporated at the time of your next revision. In the interim we will be asking for NRC's comments on these issues.

We commend you for the thoroughness and organization of this QA Plan, particularly the Requirements Matrix in Table 2-2. This was very helpful to our review. One missing element, which I ask that you develop and issue as soon as possible, is a matrix clearly delineating the duties and responsibilities of the Project Office, Integrating contractor, and other project participants.

  
William J. Purcell  
Associate Director for  
Geologic Repositories

Attachment

WM Record File 101.2  
WM Project 10  
Docket No. 10  
PDR   
LPDR  (B)  
Distribution: Delligatti Linehan DRM  
Kennedy Bilhorn Hedges  
G.T. Ankrum Hildenbrand CFR  
(Report to WM. 623-SS)

Attachment

HQ Comments on Appendix A to BWID QA Plan

Item 4

The NRC Review Plan clearly requires an independent verification of conformance to established requirements and clearly requires that the QA organization be responsible for this independent verification. We concur with the NRC position. Thus the BWID proposed clarification (item 4 of Appendix A), as written, is rejected. We feel it is permissible to use DOE project technical staff and independent contractor staff to aid in the independent verification, as suggested by BWID, but that such personnel must do so under the purview and control of the QA organization. The QA organization's responsibility for the independent verification cannot be "shared" with other organizational elements.

Item 6

The BWID proposed clarification is acceptable only if all design activities are delegated to the contractor.

Item 11

We concur with the NRC position that corrective action to prevent recurrence of nonconformances always be taken and documented. The BWID proposal to evaluate some nonconformances is rejected.

Item 13

It is unclear what BWID is proposing. We feel it is essential that geotechnical samples be considered geotechnical records as specified in the NRC Review Plan.

FOR OCRWM DISTRIBUTION

SUBJECT: HQ Review of Basalt Waste Isolation Division (BWID)

ADDRESSEE: Lee Olson, BWID

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