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NUCLEAR REGULATORY COMMISSION  
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WM Project WM-10

Docket No. \_\_\_\_\_

PDR

LPDR

Distribution: \_\_\_\_\_

(Return to WM, 623-88)

MEMORANDUM FOR: Hubert J. Miller, Chief  
High-Level Waste Technical Development Branch  
Division of Waste Management

FROM: Walter P. Haass, Chief  
Quality Assurance Branch  
Division of Engineering

SUBJECT: REVIEW OF THE QA CHAPTER IN THE SCR FOR THE BWIP

In your memorandum of November 15, 1982, you request our review and comments on Chapter 18 of the Site Characterization Report (SCR) for the Basalt Waste Isolation Project (BWIP). Chapter 18 presents a description of the QA program for site characterization activities. You state that comments are needed by November 30, 1982. We have agreed with your project personnel to a schedule of December 3, 1982 for the submittal of our comments, and a draft of this memo was delivered to Jay Rhoderick on that date.

We have reviewed Chapter 18 of the BWIP SCR enclosed with your November 15, 1982 memorandum. The basis of our review was the "NRC Review Plan" which was part of the enclosure to your letter to DOE of November 4, 1982.

Chapter 18 of the BWIP SCR, "Quality Assurance," addresses the 18 criteria of Appendix B, and it appears to be relatively well developed. It does not, however, address each of the acceptance criteria of the review plan. Deficiencies are noted in the enclosed request for additional information.

We believe an efficient and more effective way to clarify what is needed and what will be supplied would be for the QAB reviewer to have a working meeting with responsible DOE/operating contractor personnel to discuss the acceptance criteria in the "NRC Review Plan" vs Chapter 18 of the SCR and the deficiencies we have identified. Such a meeting would supplement issuance of the enclosure in a formal manner. We are available for such a meeting or for further assistance as may be required.

*Walter P. Haass*  
Walter P. Haass, Chief  
Quality Assurance Branch  
Division of Engineering

Enclosure: RAI

cc: J. Rhoderick  
M. Natarajob  
J. Greeves

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Request for Additional Information

BWIP SCR QA

1. Provide a commitment that DOE will annually perform an evaluation of the  
(1.4) QA program of its principal contractors and describe how this evaluation will be performed.
2. Describe the criteria for determining the size of the QA organization  
(1.7) (including the inspection staff) of DOE and its principal contractors.
3. Describe the qualification requirements for the position of Safety and  
(1.9) QA Division Director and discuss the time spent on QA matters by the individual holding this position.
4. Provide a commitment that verification of conformance to established  
(1.10) requirements is accomplished by personnel within the QA organizations.
5. Identify QA personnel (by position title) in DOE and in the principal  
(1.11) contractor's organization who are authorized to
  - a. Identify quality problems.
  - b. Initiate, recommend, or provide solutions through designated channels.
  - c. Verify implementation of solutions.
  - d. Stop unsatisfactory work.Describe how these actions are accomplished.
6. Describe how disputes involving quality arising from a difference of opinion  
(1.12) between QA personnel and other department personnel are resolved.
7. Identify (by position title) the QA personnel involved in day-to-day site  
(1.13) activities important to safety.
8. Identify (by position title) the individual at the site who, during and  
(1.15) after site selection, is responsible for directing and managing the site QA program. If not clear in section 18 of the SCR, clarify that this individual has an appropriate organizational position, responsibilities, and authority to exercise proper control over the QA program; that he is free from non-QA duties; and that he can thus give full attention to assuring that the QA program at the site is being effectively implemented.
9. Identify existing or proposed QA procedures reflecting that each criterion  
(2.6) of 10 CFR Part 50, Appendix B will be met by documented procedures.

Note: Numbers in parentheses refer to items numbered in the "NRC Review Plan" which is part of the enclosure of the 11/4/82 letter from Miller (NRC) to Ballard (DOE).

10. Describe how management (above or outside the QA organization) maintains frequent contact with program status through reports, meetings, and/or audits.  
(2.7)
11. For both DOE and its principal contractors, provide a commitment that management (above or outside the QA organization) will annually perform a preplanned and documented assessment of its QA program and that corrective action is identified and tracked.  
(2.7)
12. Provide a commitment that the indoctrination, training, and qualification program described on page 18.2.2 of the SCR for both doers and verifiers includes provisions such that:  
(2.8)
  - a. Documentation of formal training and qualification includes the objective, content of the program, attendees, and date of attendance.
  - b. Proficiency tests are given to those personnel performing and verifying activities affecting quality, and acceptance criteria are developed to determine if individuals are properly trained and qualified.
  - c. Certificates of qualifications clearly delineate the specific functions personnel are qualified to perform and the criteria used to qualify personnel in each function.
13. In section 18.3, "Design Control," of the SCR, describe provisions that address items 3.1, 3.2, 3.4, 3.5, 3.6, 3.7, and 3.8 of the "NRC Review Plan."  
(3)
14. Clarify that the QA personnel review of procurement documents assures that quality requirements are correctly stated, inspectable, and controllable; that there are adequate acceptance and rejection criteria; and that procurement documents have been prepared, reviewed, and approved in accordance with QA program requirements.  
(4.1)
15. Describe how the identity of the applicable revision of instructions, procedures, specifications, drawings, and procurement documents is made known to personnel performing the work.  
(6.5)
16. Describe the organizational responsibilities for the control of purchased material, equipment, and services.  
(17.1)
17. Clarify that vendors, suppliers and service type organizations are required to furnish the following records to the purchaser:  
(7.2)
  - a. Documentation that identifies the purchased item and the specific procurement requirements (e.g., codes, standards, and specifications) met by the item.
  - b. Documentation identifying any procurement requirements that have not been met.
  - c. A description of those nonconformances from the procurement requirements dispositioned "accept as is" or "repair."

18. Provide a commitment that suppliers' certificates of conformance are periodically evaluated by audits, independent inspections, or tests to assure they are valid and the results documented.  
(7.3)
19. Clarify that procedures are established for recording evidence of acceptable accomplishment of special processes using qualified procedures, equipment, and personnel.  
(9.4)
20. Clarify that procedures provide criteria for determining the accuracy requirements of inspection equipment and criteria for determining when inspections are required or define how and when inspections are performed. Verify that the QA organization participates in assuring the completeness of procedures regarding these matters and in the implementation of these functions.  
(10.1)
21. The second paragraph of section 18.10 of the SCR states: "[F]inal acceptance inspection (is) accomplished by the responsible design organization. Source and receiving inspection is performed by the procuring organization...." Clarify that the appropriate QA organization performs such inspections.  
(10.2)
22. Describe how the QA organization is involved in scoping the test control program.  
(11.1)
23. Describe the procedures and identify the organization responsible for calibration, maintenance, and control of measuring and test equipment (instruments, tools, gages, fixtures, reference and transfer standards, and nondestructive test equipment).  
(12.3)
24. Clarify that measuring and test equipment is identified and traceable to the calibration test data.  
(12.4)
25. Clarify that measuring and test equipment is labeled or tagged to indicate due date of the next calibration.  
(12.5)
26. Clarify that measuring and test equipment is calibrated at specified intervals based on the required accuracy, purpose, degree of usage, stability characteristics, and other conditions affecting the measurement. Calibration of this equipment is against standards that have an accuracy of at least four times the required accuracy of the equipment being calibrated or, when this is not possible, have an accuracy that assures the equipment being calibrated will be within required tolerance. The basis of acceptance is documented and authorized by responsible management.  
(12.6)
27. Provide a commitment that primary calibrating standards have greater accuracy than secondary standards being calibrated. (Calibrating standards with the same accuracy may be used if it can be shown to be adequate for the requirements and the basis of acceptance is documented and authorized by responsible management.)  
(12.7)

28. Describe procedures which control altering the sequence of inspection  
(14.2) and tests.
29. In section 18.17, "Quality Assurance Records," of the SCR, describe  
(17) provisions that address items 17.1, 17.2, 17.3, and 17.4 of the "NRC  
Review Plan."
30. Clarify that DOE performs both internal and external audits to assure  
(18.1) that procedures and activities comply with the overall QA program.