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QA: N/A
Project No. WM-00011

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RESPONSE TO U.S. NUCLEAR REGULATORY COMMISSION (NRC) REPLY TO
U.S. DEPARTMENT OF ENERGY (DOE) RESPONSE TO THE NRC OBSERVATION
AUDIT REPORT (OAR) OAR-05-05, DATED MARCH 15, 2007

- References: (1) Ltr, Mohseni to Williams, dtd 3/15/07 (Reply to U.S. Department of Energy's Response to the U.S. Nuclear Regulatory Commission Observation Audit Report OAR-05-05)
- (2) Ltr, Williams to Director, DHLWRS (NRC), dtd 9/11/06 (Response to the U.S. Nuclear Regulatory Commission [NRC] Audit Observer Inquiries [AOI] from the Bechtel SAIC Company, LLC [BSC], Quality Assurance Audit BQAP-BSC-05-07)

This letter provides a supplemental response to the subject NRC letter dated March 15, 2007 (Reference 1). The NRC's OAR identified five AOIs and the DOE has provided responses to each of the issues (Reference 2). This letter provides additional information regarding the three items below:

"AOI-05-05-03, concerning inconsistencies found in two reports related to localized corrosion at elevated temperatures, is closed. DOE committed to correct the inconsistencies in a future revision of the analysis model reports. Completion of the corrective actions will be verified by the On-Site Representatives..." (Closed)

Although the NRC considers AOI-05-05-03 to be closed, the NRC cited a DOE commitment to correct the inconsistencies in a future revision of two analysis model reports (AMRs) and that the completion of the corrective actions will be verified by the NRC On-Site Representatives. The actions to provide corrections in a future revision to AMRs ANL-EBS-MD-000003, "General

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and Localized Corrosion of the Waste Package Outer Barrier,” Revision 2, and ANL-EBS-MD-000074, “Analysis of Dust Deliquescence for FEP Screening,” Revision 00, and to determine the reasons for the inconsistencies have been completed and the relevant information has been provided to the NRC On-Site Representatives. These actions are documented as complete in condition report CR-10670, which was statused as “Closed” on January 23, 2008.

“AOI-05-05-04, concerning referencing cancelled documents, was not adequately addressed in the DOE response. As such, the NRC is unable to close this AOI pending clarification of the project controls related to the referencing of cancelled documents in technical products that support the potential license application...” (Open)

The relevant procedures have been revised and appropriate document control processes are in place to preclude the referencing of cancelled documents. Direction has been provided to BSC and the Sandia National Laboratories (SNL) stating that, in general, the License Application (LA) shall not contain references to "cancelled" or "superseded" documents. Exceptions may be made where reference to a "cancelled" or "superseded" document is made only for historical or contextual purposes to aid the reader in understanding the evolution of information or process. No reference to a "cancelled" or "superseded" document may be made in support of a technical basis assertion in the LA.

Changes have been made in the Controlled Documents Information System and applicable procedures for document control that provide a process to review and change the status of a “cancelled” or “superseded” document for appropriate use in support of the LA. Use of such documents must be determined to be appropriate, valid, and adequate for the intended use by the organization citing the document.

“AOI-05-05-05, concerning the adequacy of the calibration of the Vaisala temperature and humidity probes at elevated temperatures, remains unresolved. The information provided in the DOE response did not provide an adequate technical basis to address the NRC’s concerns on this issue...” (Open)

In response to the NRC’s calibration adequacy concern, the data that were associated with the Vaisala humidity probes was downgraded to unqualified and put behind the firewall (i.e., no longer accessible for technical product author use) in the Technical Data Management System in order to prevent future use in a qualified product. This data is not being referenced or used as computational input in support of the pending LA.

In letters, which are available for inspection, dated November 14, 2007 and November 21, 2007, to the SNL as Lead Laboratory and BSC, respectively, DOE provided programmatic guidance for future uses of Vaisala probes.

There are no new regulatory commitments made in this letter. If you have any questions regarding this matter, please contact Neal K. Hunemuller at (702) 794-5081 or e-mail neal_hunemuller@ymp.gov.



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RAO:NKH-0693



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