



UNITED STATES
NUCLEAR REGULATORY COMMISSION
Washington, D.C. 20555-0001

April 30, 2008

MEMORANDUM TO: Aby Mohseni, Deputy Director
Licensing and Inspection Directorate
Division of High-Level Waste Repository Safety
Office of Nuclear Material Safety and Safeguards

FROM: Jack D. Parrott, Senior On-Site Licensing Representative */RA/*
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Repository and Spent Fuel Safety Branch
Division of Material Safety, Region IV

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION ON-SITE
LICENSING REPRESENTATIVES' QUARTERLY REPORT
NUMBER OR-08-01, ON THE YUCCA MOUNTAIN PROJECT,
FOR JANUARY 1, 2008 THROUGH MARCH 31, 2008

This memorandum transmits the U.S. Nuclear Regulatory Commission (NRC) On-Site Representatives' (ORs) Quarterly Report Number OR-08-01 for January 1, 2008 through March 31, 2008

The OR Quarterly Report highlights a number of Yucca Mountain Project activities of potential interest to NRC staff. The ORs continue to respond to requests from NRC Headquarters staff to provide various documentation and feedback related to technical issues and their resolution. During this reporting period, the ORs continued to observe on-site activities at Yucca Mountain.

In accordance with 10 Code of Federal Regulations 2.390, of NRC's "Rules of General Applicability," a copy of this letter/report will be available electronically, in the NRC Public Document Room, and/or from the Publicly Available Records component of NRC's document system, Agency-wide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions about this report or its enclosures, please call Jack D. Parrott, at 702-794-5047, or Leonard M. Willoughby, at 702-794-5048.

Enclosures:

1. "U.S. Nuclear Regulatory Commission On-Site Licensing Representatives' Report, Number OR-08-01, for the reporting period of January 1, 2008 through March 31, 2008.
2. Table 1: "U.S. NRC On-Site Licensing Representatives' Tracking Report for Open Items Followed in OR Report(s)"

Memorandum to A. S. Mohseni, Deputy Director, LID, from J. Parrott, V. Everett, and L. Willoughby, dated: April 30, 2008

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L. Mathias, Mineral County, NV
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J. Donnell, MTS
L. Lehman, T-REG, Inc.
D. Irwin, Hunton & Williams
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E. Hiruo, Platts Nuclear Publications
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J. Kennedy, Timbisha Shoshone Tribe
P. Thompson, Duckwater Shoshone Tribe
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V. Guzman, Inter-Tribal Council of NV
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J. Bacoch, Big Pine Paiute Tribe of
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K. Phillips, City of Caliente, NV
L. Lee, City of Las Vegas, NV
G. Hernandez, Las Vegas Paiute Tribe
B. Durham, Timbisha Shoshone Tribe
C. Meyers, Maopa Paiute Indian Tribe
C. Dahlberg, Fort Independence Indian Tribe
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U.S. NUCLEAR REGULATORY COMMISSION
ON-SITE LICENSING REPRESENTATIVES' REPORT
NUMBER OR-08-01
FOR JANUARY 1, 2008 THROUGH MARCH 31, 2008

Enclosure 1

TABLE OF CONTENTS

U.S. NUCLEAR REGULATORY COMMISSION ON-SITE LICENSING REPRESENTATIVES' REPORT NUMBER OR-08-01 FOR JANUARY 1, 2008 THROUGH MARCH 31, 2008

	Page
TABLE OF CONTENTS.....	i
ACRONYMS AND ABBREVIATIONS.....	ii
EXECUTIVE SUMMARY	1
REPORT DETAILS.....	2
Introduction	
Objectives	
1. Site Activities and Data Acquisition	2
2. Outreach Activities	3
3. QA and Engineering.....	3
4. General Activities	6

ACRONYMS AND ABBREVIATIONS

<u>Acronym</u>	<u>Meaning:</u>
ADAMS	Agency-wide Document Access and Management System
AULG	Affected Units of Local Government
BSC	Bechtel SAIC Company, LLC
CNWRA	Center for Nuclear Waste Regulatory Analyses
DOE	U.S. Department of Energy
DTNs	Data Tracking Numbers
ESF	Exploratory Studies Facilities
EWDP	Early Warning Drilling Program
GPS	Global Positioning System
LA	License Application
LLNL	Lawrence Livermore National Laboratories
OCRWM	Office of Civilian Radioactive Waste Management
OR	On-Site Representative
NRC	U.S. Nuclear Regulatory Commission
PA	Performance Assessment
QA	Quality Assurance
USGS	U.S. Geological Survey

EXECUTIVE SUMMARY

SITE ACTIVITIES AND DATA ACQUISITION

At the end of January 2008, the Yucca Mountain Project site operations entered into a surveillance and monitoring mode. The underground has been closed, and much of the on-site support services have been removed from the Exploratory Studies Facility (ESF) north portal site. The remaining support services have been moved to the Sample Management Facility in Jackass Flats. The testing/data collection still being conducted at the site are: 1) meteorology data collection; 2) Nye County Early Warning Drilling Program, saturated zone monitoring and characterization; 3) saturated zone water level measurements; 4) seismic monitoring; 5) dust collection; 6) tectonic strain monitoring; 7) Drift Scale Test monitoring; and 8) ESF environmental monitoring.

QUALITY ASSURANCE AND ENGINEERING

Three OR open items (06-04, 06-09, and 06-10) are being closed in this quarterly report. This completes the closure of all remaining OR open items.

From March 17-26, 2008, the OR office conducted a limited scope observation of the Lead Laboratory Quality Assurance program internal audit of igneous events technical products (LQA-IA-08-001). This observation was conducted relative to NRC recommendations made on a previous observation of a Yucca Mountain Project performance based audit. Preliminary observations indicate that the recommendations were addressed.

GENERAL ACTIVITIES

In January 2008, the new NRC Senior Resident Inspector visited the Sample Management Facility to view the NRC on-site office space.

REPORT DETAILS

INTRODUCTION

The primary purpose of the On-Site Representatives' (ORs) quarterly report is to provide the U.S. Nuclear Regulatory Commission (NRC) managers, staff, and contractors information on the U.S. Department of Energy's (DOEs) activities related to: (1) repository design; (2) performance assessment (PA); (3) performance confirmation; and (4) environmental studies. The primary focus of this OR report is on DOEs programs for: (1) subsurface and surface-based testing; (2) PA; (3) data management systems; (4) environmental studies; and (5) quality assurance (QA). Relevant information includes new technical data, DOEs plans and schedules, and the status of activities to support preparation of the License Application (LA).

This report covers the period of January 1, 2008, through March 31, 2008.

OBJECTIVES

The ORs mission is to act as points-of-contact for prompt information and exchange between NRC and DOE, and to identify preliminary concerns with site investigation and licensing issues. The ORs carry out these roles by gathering and evaluating information, identifying concerns, and bringing significant issues to NRC management's attention. The ORs also focus on issues such as design controls, data management systems and PA, and technical issues resolution. The ORs also identify areas, whether in site studies, activities, or procedures, that may be of interest or concern to the NRC staff.

1.0 SITE ACTIVITIES AND DATA ACQUISITION

1.1 Underground Entry

In December 2007, DOE's requested fiscal year 2008 budget appropriation for Yucca Mountain was reduced. This led to a decision by DOE to curtail all underground activities at the Yucca Mountain site and effectively end Bechtel SAIC Company, LLC (BSC) involvement with the site. At the end of January 2008, the Yucca Mountain Project site operations entered into a surveillance and monitoring mode. Due to the closure of the underground, much of the on-site support services have been removed from the Exploratory Studies Facility (ESF) north portal site. The remaining support services have been moved to the Sample Management Facility in Jackass Flats. There will be no regular presence at the ESF except to maintain compliance with active environmental permit monitoring requirements (e.g., use of groundwater and air quality). Forced ventilation will be turned-off; however, tunnel bulkheads will be opened to allow for natural ventilation. Underground power and existing remote underground monitoring programs will remain in place. Security patrols will continue under the Nevada Test Site system. The existing structures at the north portal will be put in cold standby with hazardous materials removed. Existing applicable site procedures will be transitioned from BSC to the Lead Lab and DOE. The Office of Civilian Radioactive Waste Management (OCRWM) is currently reviewing the budget to determine if an underground surveillance can be attempted this fiscal year.

1.2 Current Status of On-Site Testing Activities

Following closure of the underground portions of the ESF, these are the current tests being conducted at the site: 1) meteorology – six of twelve meteorology stations are being removed, the remainder will collect data for the performance confirmation program; 2) Nye County Early Warning Drilling Program (EWDP) – the natural gradient tracer test, at Nye Co. EWDP site No. 22, continues periodic sampling; 3) U.S. Geological Survey (USGS) water level measurements in select wells related to the water use permit from the State; 4) seismic monitoring – the University of Nevada-Reno will continue to monitor seismic stations in and around Area 25 of the Nevada Test Site and continues to remotely collect data in Alcove 5 and at Niche 3 in the ESF; 5) the USGS will continue to collect dust at the surface using a “cyclone dust collector,” this is related to dust deliquescence studies; 6) strain monitoring – the California Institute of Technology will continue to monitor global positioning system (GPS) receivers around Yucca Mountain to determine tectonic deformation; 7) Drift Scale Test – 195 sensors are being maintained inside and around the drift scale test in Alcove 5 to monitor temperature changes, and to visually observe the Alcove; 8) ESF environmental monitoring – an environmental monitoring station continues to collect real time data on humidity, atmospheric pressure, wind speed, wind direction, and air flow at Niche 3 of the ESF.

2.0 **OUTREACH ACTIVITIES**

No formal outreach activities were conducted by the OR office during this reporting period.

3.0 **QUALITY ASSURANCE AND ENGINEERING**

3.1 OR Open Items

Three OR open items are being closed in this quarterly report. These open items were: 1) Open Item 06-04 concerned an issue on the use of output from software that was not subject to Independent Verification & Validation remediation; 2) Open Item 06-09 concerned issues with the conclusions reached in the root cause analysis performed for Condition Report 7395 “NRC Report Documents Unidentified Deficiencies at Lawrence Livermore National Laboratories (LLNL) for Audit BQA-BSC-05-07;” and 3) Open Item 06-10 concerned the effectiveness of corrective actions for condition reports related to “Requirements Management.” This completes the closure of all remaining OR open items.

OR Open Item 06-04: NRC On-Site Licensing Representatives’ Report OR-06-02 (NRC Adams Document ML062490356), dated September 26, 2006, identified an issue related to the use of output from software that was not subject to Independent Verification & Validation remediation. This involved software codes that were referenced in Data Tracking Numbers (DTNs) and scientific notebooks issued prior to January 2003, that had not been reverified, qualified, or baselined in accordance with Procedure IT-PRO-0014 “Independent Verification and Validation of Legacy Codes.” These software codes

had been qualified, but under the software qualification procedures in effect at the time of their use. DOE initiated Condition Report 8461 "NRC OR Open Item 06-04 Regarding Retesting of Legacy Software Codes Embedded in DTNs" on June 2, 2006, to address the NRC concern. DOE estimates there is a total of 1153 DTNs that are relied upon in the license application. As of February 13, 2008, 438 DTNs and related scientific notebooks had been reviewed to verify that the software controls in place prior to January 2003 were adequate to ensure the technical correctness of the data. Of the software codes used to perform calculations, the majority are standard off-the-shelf software such as Excel, Access, or MathCad. In none of the DTNs reviewed were any errors found concerning the use of software codes.

NRC Open Item 06-04 had requested that DOE provide a basis and justification for the continued use of the legacy software associated with the DTNs. Based on the effort completed to-date by DOE in response to condition report 8461 and the lack of any issues being found during the reviews of the DTNs, there is confidence that the outputs from software associated with the pre-January 2003 DTNs provide technically correct data outputs. Therefore, DOE has provided an adequate basis and justification for continued use of the legacy software. **Open Item 06-04 is closed.**

OR Open Item 06-09: NRC Onsite Licensing Representatives Report OR-06-09 (NRC Adams Document: ML063400179), dated December 6, 2006, identified issues related to the conclusions reached in the root cause analysis performed for Condition Report 7395 "NRC Report Documents Unidentified Deficiencies at Lawrence Livermore National Laboratories (LLNL) for Audit BQA-BSC-05-07." The deficiencies were associated with the NRC observation of an audit conducted by BSC at LLNL in August 2005 and centered on the NRC's concern that several issues identified by the NRC during the audit had not been factored into the BSC audit team's evaluations, nor had they been entered into the corrective action program system. As a result, DOE later issued numerous condition reports related to the NRC concerns including Condition Reports 7395, 9664, 10556, 10969 and several others. Throughout this process, the NRC tracked the progress of DOE in resolving the issues. The NRC observed that the various condition reports issued, and analyses performed, were not always effective in dealing with the issues identified by the NRC nor did they demonstrate an understanding of the problems. OR-Open Item 06-09, related to the root-cause analysis for Condition Report 7395, exemplified this concern. DOE continued to work on the issues to resolve the NRC concerns. Condition Report 10556 and its associated root-cause analysis provide a good insight into some of the problems that were occurring during the ongoing attempts to address the NRC identified problems. Over the past 2-1/2 years, the NRC has closely watched subsequent audits and has not observed the problems seen in the 2005 audit at LLNL. As such, the NRC is satisfied that the original issues have been resolved. **Open Item 06-09 is closed.**

OR Open Item 06-10: NRC On-Site Licensing Representatives' Report OR-06-04 (NRC Adams Document: ML070300885), dated January 31, 2006, identified an issue concerning the effectiveness of corrective actions for condition reports related to requirements management problems and the potential that this represented an adverse trend in this area. As a result of the NRC concerns, DOE issued Condition Report 10285 "NRC Open Item OR-OI-06-10 Regarding Requirements Management." DOE also issued Condition Report 10381 "Inadequate Corrective Actions to Prevent

Recurrence for Conditions Related to Requirements Management” and Condition Report 10642 “Trend Relative to Implementation of Programmatic Requirements.”

These condition reports identified potential problems with the flow-down of requirements and the requirements management process being used on the project. This issue had been identified during BSC Audit BQA-BSC-07-01 and brought into question whether the closure of several previous condition reports had been adequate to resolve the issue in the past. As a result, a Project evaluation team was established and a cause analysis performed. The team looked at 191 condition reports that could be related to requirements management issues and concluded that ineffective corrective actions were not occurring, but two adverse trends did exist. These trends were associated with the issues in Condition Reports 10285 and 10642. The first trend related to an elevated rate of occurrence of condition reports associated with implementation of quality assurance programmatic requirements. The second trend identified a continuing occurrence of condition reports related to establishing a link between the requirements in the quality program with the associated implementing mechanism. A review of the OCRWM Program Trend Evaluation Report for the 4th Quarter Fiscal Year 2007, dated November 2007, found both trends listed in the report.

Completion of DOE’s evaluation of the effectiveness of previously closed corrective actions and the inclusion of the two adverse trends related to programmatic requirements into the trend evaluation program completes the activities related to this open item. **NRC Open Item 06-10 is closed.**

3.2 Limited Observation of Lead Lab QA Audit

From March 17-26, 2008, the OR office conducted a limited scope observation of the Lead Laboratory Quality Assurance program internal audit of igneous events technical products (LQA-IA-08-001). The observation was limited to those aspects of the auditing process that the NRC made recommendations on from a previous observation of the OCRWM QA (OQA) audit (OQA-SNL-07-06) of the Infiltration Model Report. The pertinent NRC recommendations on the OQA audit of the infiltration technical product were: 1) avoid grouping multiple audit-identified technical issues into one condition report; 2) conduct audits earlier in the model development process so that QA issues can be addressed before the final revision of the technical product; 3) include in performance based audits of technical products any supporting documents that discuss the collection, qualification, reduction, and manipulation of input data critical to the technical product being audited; and, 4) make effective use of the acceptance criteria from the NRC’s Yucca Mountain Review Plan as performance-based audit criteria.

Preliminary observations of this audit indicate that each of these recommendations was addressed. However, NRC will wait until the final audit report is issued (within 30-days from the end of the audit) to review the full response to each of these recommendations.

4.0 **GENERAL ACTIVITIES**

On January 31, 2008, the NRC Senior On-Site Licensing Representative accompanied the new NRC Senior Resident Inspector on a site visit to the Sample Management Facility to tour the facility and view NRC office space in the building.

**U.S. NRC ON-SITE LICENSING REPRESENTATIVES' TRACKING REPORT FOR OPEN ITEMS
FOLLOWED IN OR REPORT**

**Table 1
Enclosure 2**

OPEN ITEMS NUMBER (For Tracking Only)	BRIEF DESCRIPTION OF OPEN ITEMS	OPEN ITEM OR REPORT NO.:	DATE OPEN ITEM CLOSED
AOI-OCRWM-OQA-05-20-02	Revise procedure AP-3.13Q to reflect 10CFR63.21 requirements related to completeness of information necessary for LA review.	OR-05-03	OR Report No. OR-07-03 October 30, 2007
AOI-OCRWM-OQA-05-20-01	Procedural controls for "preliminary" classification of Engineering calculations will be revised to clearly define the designation of completed calculations suitable to support the requisite safety analysis.	OR-05-03	OR Report No. OR-07-03 October 30, 2007
AOI-YMSCO-ARC-02-12-01	Identifies the need for DOE OQA to ensure that procedure development and review process include a documented evaluation to verify compliance with the requirements of the YMP's QARD.	OR-03-01	OR Report No: OR-03-03 August 15, 2006
OR Open Item 07-01	Failure to take prompt corrective actions related to documenting CAQs in the CAP system and initiating a RCA in response to QA program inadequacies identified in Level A, CR1041.	OR-07-01	OR Report No.: OR-07-04 January 31, 2008

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OPEN ITEMS NUMBER (For Tracking Only)	BRIEF DESCRIPTION OF OPEN ITEMS	OPEN ITEM OR REPORT NO.:	DATE OPEN ITEM CLOSED
OR Open Item 06-10	BSC had not implemented effective requirements management system for the QMD sections that were reviewed during an audit, indicating inadequate corrective actions for previous conditions identified in CRs - signify emerging adverse trends.	OR-06-04	OR Report No.: OR-08-01 April 30, 2008
OR Open Item 06-09	Based on OR review of the RCA for CR7395, it was determined that the RCA for CR7395 does not support the stated conclusions nor does it adequately address the extent of the condition and impact.	OR-06-03	OR Report No.: OR-08-01 April 30, 2008
OR Open Item 06-08	The Project has failed to maintain adequate procedural controls related to the assignment of event codes to condition reports as required by the QARD, Section 16.2.6a	OR-06-03	OR Report No. OR-07-01 April 30, 2007
OR Open Item 06-07	Failure to process clarification related to the content and completeness of a CR record package in accordance with requirements of LP2.2Q, is identified as a deficiency. Clarification in response does not comply with the requirement.	OR-06-02	OR Report No. OR-07-02 July 30, 2007

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OR Open Item 06-06	Establish a relationship between actions to address deficiencies in requirements management processes and changes to the Engineering Design organizations.	OR-06-02	OR Report No: OR-06-02 September 26, 2006
OR Open Item 06-05	Despite the existence of numerous CRs related to requirements management, BSC did not effectively describe the planned and completed CA that would resolve the deficiencies currently being overseen by DOE's IRPT.	OR-06-02	OR Report No: OR-06-02 September 26, 2006
OR Open Item 06-04	Based on Audit Observation of Software Control (OQA-BSC-06-10), requesting a basis and justification for the continued use of the output from software on the baseline that has not undergone IV&V remediation.	OR-06-02	OR Report No.: OR-08-01 April 30, 2008
OR Open Item 06-03	Based on Audit Observation of Software Control (OQA-BSC-06-10), requesting a description of DOE's remediation processes related to the approximately 35 legacy codes.	OR-06-02	OR Report No.: OR-07-04 January 31, 2008

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OR Open Item 06-02	Requirements Flow-Down and Procedure Adequacy and Audit Observation: Involved the inconsistent use of quality-affecting document designators that indicated inadequate corrective actions related to similar conditions documented in CR3448.	OR-06-01	OR Report No.: OR-07-04 January 31, 2008
OR Open Item 06-01	Requirements Flow-Down and Procedural Adequacy Audit Observation: Concerned discrepancy in the definition of the term "requirement" in a BSC desktop instruction, which was inconsistent with the requirements for design input control defined in QARD Section 3.2.1.	OR-06-01	OR Report No: OR-06-04 January 31, 2007
OR Open Item 05-02	Pending Project response to the discovery of potential falsification of QA records, completion of second and third initiatives described in the work plan.	OR-05-03	OR Report No. OR-07-01 April 30, 2007
OR Open Item 05-01	Inconsistencies in the root cause statements developed by the root cause analysis team, specifically the root cause related to traceability and transparency issues. Pending resolution of the apparent discrepancies in the root cause analysis for CR3235 identified in this Open Item.	OR-05-02	OR Report No. OR-07-03 October 30, 2007

**U.S. NRC ON-SITE LICENSING REPRESENTATIVES' TRACKING REPORT FOR OPEN ITEMS
FOLLOWED IN OR REPORT**

Table 1
Enclosure 2

OPEN ITEMS NUMBER (For Tracking Only)	BRIEF DESCRIPTION OF OPEN ITEMS	OPEN ITEM OR REPORT NO.:	DATE OPEN ITEM CLOSED
OR Open Item 04-01	A concern regarding the safety analysis of the ground support system in the ESF.	OR-04-01	OR Report No: OR-04-04 October 27, 2004
OR Open Item 03-06	Based on the review of CR756, twelve quality-affecting procedures were approved without meeting the applicable QARD requirements.	OR-03-05	OR Report No: OR-04-04 March 4, 2005
OR Open Item 03-05	The continued use of unqualified software in quality affecting technical products appears to be in conflict with the governing requirements of the implementing procedures and the QARD.	OR-03-04	OR Report No: OR-06-04 January 31, 2007
OR Open Item 03-04	With a tentative date of mid-June, to evaluate CAR BSC(B) 03-(C)-107, the RCD has not acted on this CAR in a timely manner and it has remained opened for 4 months without evaluation.	OR-03-03	OR Report No: OR-03-05 January 12, 2004
OR Open Item 03-03	An evaluation in DOE's progress in implementing corrective actions associated with CAR BSC(B) 01-(C)-001, concerning model validation, the OR reviewed TAPS (approx. 43 models). Based on the results, it could not be established if the evaluation criteria will result in the development of models with adequate confidence for the LA.	OR-03-02	OR Report No: OR-05-02 July 12, 2005

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OR Open Item 03-02	During a review of the MII confirmation packages, it was identified that the action statement execution task descriptions and completion schedules for many of the reviewed pkgs had been modified without appropriate justification. Therefore, pending the resolution of this apparent deviation from a commitment to administer the MII in accordance with the requirements of AP-5.1Q, this issue is identified as this OR Open item.	OR-03-02	OR Report No: OR-04-02 July 8, 2004
OR Open Item 03-01	This Open Item is based on issues on separate DRs: (1) the effective resolution of concerns related to inadequate personnel training; (2) the failure to establish an effective transition plan; and (3) the evaluation of the SCWE issues.	OR-03-01	OR Report No: OR-03-04 October 20, 2003
OR Open Item 02-13	The current status of corrective and preventive actions associated with CAR No.; BSC-02-C-01 revealed that not all corrective actions stated had been completed.	OR-02-05	OR Report No: OR-03-05 January 12, 2004

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OPEN ITEMS NUMBER (For Tracking Only)	BRIEF DESCRIPTION OF OPEN ITEMS	OPEN ITEM OR REPORT NO.:	DATE OPEN ITEM CLOSED
OR Open Item 02-12	Contrary to requirements of the QARD Supplement III 2.4.C, AP-SIII.2Q inappropriately allows for the use of unqualified data. BSC QA procedure change control program failed to identify this issue.	OR-02-05	OR Report No: OR-04-06 March 4, 2005
OR Open Item 02-11	Based on surveillance not identifying specific problems with software functionality for codes tested 7, including NUFT, did not pass ITP and/or VTP surveillance.	OR-02-05	OR Report No: OR-03-06 February 16, 2004
OR Open Item 02-10	Pending appropriate evaluation and documentation of the design control attributes associated with requirements of 10CFR63.44 and 10CFR Part 21.	OR-02-04	OIR Report No.: OR-07-04 January 31, 2008
OR Open Item 02-09	Pending revision of engineering procedures to include appropriate design verification considerations.	OR-02-04	OR Report No: OR-03-06 February 18, 2004
OR Open Item 02-08	The required performance of annual audits justification for delaying a scheduled audit of YMSCO for 3 months, with an additional extension, does not appear to be adequately supported. Deviation from requirement of sub-section 18.2.1E of the QARD.	OR-02-04	OR Report No: OR-03-06 January 23, 2003

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OPEN ITEMS NUMBER (For Tracking Only)	BRIEF DESCRIPTION OF OPEN ITEMS	OPEN ITEM OR REPORT NO.:	DATE OPEN ITEM CLOSED
OR Open Item 02-07	Model Validation Impact Assessment addressed the effect of inappropriately validated models on TSPA-SR. Many cases of impact assessments used TSPA-SR results to evaluate the local impacts. It's unclear how this practice evaluated the cumulation impact of all the models in question.	OR-02-01	OR Report No: OR-03-06 February 18, 2004
OR Open Item 02-06	Unqualified Data Impact Assessment - NRC staff identified unqualified data that could be replaced with qualified data for the performance assessment. For the risk-significant components, an evaluation of unqualified data replaced with qualified data would help determine if efforts should be undertaken to qualify the removed data.	OR-02-01	OR Report No: OR-03-06 July 8, 2004
OR Open Item 02-05	Provisions are in place that allow for model validation to continue past issuance of the documentation. The models used in the performance assessment should have adequate support for their representation at the time the performance assessment documentation is issued.	OR-02-01	OR Report No: OR-03-06 February 18, 2004

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OPEN ITEMS NUMBER (For Tracking Only)	BRIEF DESCRIPTION OF OPEN ITEMS	OPEN ITEM OR REPORT NO.:	DATE OPEN ITEM CLOSED
OR Open Item 02-04	A number of criteria have been developed related to various forms of review. If a review is relied on for model validation, it should be directed at validating the model and it should encompass the full body of information to the extent practical.	OR-02-01	OR Report No: OR-03-01 April 14, 2003
OR Open Item 02-03	More objective criteria (comparison to data not used in the development of the model), typically resulting in higher confidence in model validation are not distinguished from the more subjective, problematic criteria.	OR-02-01	OR Report No: OR-03-02 June 11, 2004
OR Open Item 02-02	Current process controls specify that one or more of nine criteria may be used to validate a model. All the criteria should increase confidence in the modeling process; some criteria do not appear to be appropriate for addressing whether the model is valid for its intended use.	OR-02-01	OR Report No: OR-03-01 April 14, 2003
OR Open Item 02-01	Failure to properly include the specific issues identified in the Concerns Program Final Report in the resolution process may result in not adequately addressing the original employee's concern.	OR-02-01	OR Report No: OR-02-06 January 23, 2003