

## HLWYM NPEmails

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**From:** Vincent Everett  
**Sent:** Wednesday, November 21, 2007 10:39 AM  
**To:** Blair Spitzberg; Robert Latta; Frank Jacobs; Jack Parrott  
**Subject:** MC 2300 Objectives  
**Attachments:** Process for Objectives.doc; 2300\_02.01 Table.doc; 2300\_02.02 Table.doc; 2300\_02.03 Table.doc; 2300\_02.04 Table.doc; 2300\_02.05 Table.doc

Attached are proposed objectives for MC 2300 which I think would be good objectives for our program. This is the period from LA submittal to CA. This is only the objectives, and nothing else. The attachments do not address whether the state can come along, is the report publically available, do we have field review forms, etc. First we need to agree what the objectives of the inspection program are.

There are 5 objectives that I see would be useful to pursue during the LA review period. These are

1. Support to HLWRS for LA review
2. Was QA adequately applied to data collection, analysis and modeling
3. Is the ongoing design work being done in accordance with QA and commitments in the LA
4. Is any vendor work on long lead time items being done in accordance with QA requirements
5. Allegation follow-up

These are the 5 proposed objectives for MC 2300. Then I looked at the process we would use to turn the objective into an actual inspection. For each objective I walked myself through a possible process. That is what the other attachments below are.

See what you think. Don't get hung up in word smithing. We have plenty of opportunity for that later. Look at the big picture. Are these ideas even something we would want to consider.

This is being sent to support our Dec meeting in Las Vegas, and is intended to start the dialogue as we get ready for our meeting.

Vincent

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**Received Date:** 11/21/2007 10:38:53 AM  
**From:** Vincent Everett

**Created By:** Vincent.Everett@nrc.gov

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"Frank Jacobs" <Frank.Jacobs@nrc.gov>  
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**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1418	11/21/2007 10:38:53 AM
Process for Objectives.doc		22080
2300_02.01 Table.doc	47680	
2300_02.02 Table.doc	75840	
2300_02.03 Table.doc	76352	
2300_02.04 Table.doc	45632	
2300_02.05 Table.doc	46656	

**Options**

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YUCCA MOUNTAIN INSPECTION PROGRAM:  
LICENSE APPLICATION REVIEW PERIOD

2300-01      PURPOSE

To provide inspection policy and guidance for the implementation of the inspection program at Yucca Mountain during the period between receipt of the license application and potential issuance of the construction authorization.

2300-02      OBJECTIVES

**02.01** To provide support to the license review staff to verify that information in the license application meets requirements specified in 10 CFR Part 63.

**02.02** To provide guidance for the evaluation of the quality assurance (QA) program, as described in the license application, to provide reasonable assurance of the integrity and reliability of the data collection, modeling or analyses that would affect the performance of important to safety systems, structures, and components (SSCs) and important to waste isolation engineered barrier systems and natural barriers.

**02.03** To provide guidance for the evaluation of engineering design activities to verify that ongoing facility design, drawings, calculations and instructions are being developed, reviewed and finalized consistent with commitments made in the license application and the applicant's QA program.

**02.04** To provide guidance for the evaluation of fabricator and vendor quality assurance programs for companies providing services, equipment and components for long lead time items important to safety and important to waste isolation. This may include audits/inspections at facilities where actual design, fabrication and testing is performed.

**02.05** To evaluate allegations that information provided in the licensee application is not complete or accurate per 10 CFR 63.10.

**THE FOLLOWING PAGES IDENTIFY THE PROCESS OF GOING FROM THE ABOVE LISTED OBJECTIVES TO AN INSPECTION PROGRAM**

## HLWRS REQUESTS FOR AUDITS/INSPECTIONS (02.01)

MC 2300 Section 02.01 Objective: *“To provide support to the licensing review staff to verify that information in the license application meets requirements specified in 10 CFR Part 63”*

The following process is proposed to implement this objective in MC 2300:

STEP	ACTION
1	An issue is identified by HLWRS staff
2	Dialogue within HLWRS determines that this issue is best pursued through an inspection as opposed to an RAI. Frank Jacobs coordinates this dialogue.
3	Blair is contacted via phone or e-mail by Frank Jacobs and the issue is discussed. Agreement is reached that the issue can best be pursued as an inspection and Blair’s group has time to pursue it based on priorities of other work “on-the-table”
4	Blair directs one of his staff to contact the HLWRS technical contact and Frank Jacobs to develop an audit/inspection plan
5	Blair’s staff member develops an audit/inspection plan with specific issues to be inspected. The plan is agreed to with the technical person and Frank in HLWRS. A due date is agreed to.
6	The audit/inspection plan is approved by Blair and sent to Frank, who obtains the necessary review and approvals from the responsible HLWRS Branch Chief, the responsible Technical Project Manager, and OGC. Significant changes to the audit/inspection plan will be discussed with RIV.
7	RIV, as the lead, conducts the audit/inspection. A technical reviewer participates to the level determined by HLWRS management. Outside participation is determined by OGC. An entrance and exit is conducted with DOE.
8	After the audit/inspection, a technical briefing is provided by RIV to HLWRS and OGC of the findings to confirm that the results of the inspection will provide the information that was needed by HLWRS. If not, the issues are redefined and additional information is collected by RIV to adequately answer the technical questions.
9	RIV writes a report to HLWRS using IMC 0610 as guidance. Blair approves the report and forwards the report to OGC for concurrence. The report is made publicly available as determined by OGC.
10	RIV processes potential violations.
11	RIV tracks requests by audit/inspection issuance date and status (i.e. complete, in-process, on-hold, etc)

## QA AUDITS/INSPECTIONS OF DATA & MODELS (02.02)

MC 2300 Section 02.02 Objective: *“To provide guidance for the evaluation of the quality assurance (QA) program, as described in the license application, to provide reasonable assurance of the integrity and reliability of the data collection, modeling or analyses that would affect the performance of important to safety systems, structures, and components (SSCs) and important to waste isolation engineered barrier systems and natural barriers.”*

The following process is proposed to implement this objective in MC 2300:

STEP	ACTION
1	RIV and HLWRS Technical Project Managers select several areas that are high or medium significance from the Risk Insights Baseline Report that will be important areas during the LA review. Frank Jacobs will coordinate this activity.
2	RIV will develop an audit/inspection plan for each of the areas selected with details as to what will be reviewed during the audit/inspection. The audit/inspection will focus on implementation of QA requirements for the collection, processing and documentation of data collected and the use of this data in models and software. Software qualification will also be reviewed.
3	RIV provides a draft audit/inspection plan for each topic selected to Frank as they are developed. Frank coordinates a review of each draft inspection plan with the appropriate HLWRS technical staff and agreement is reached between RIV and HLWRS staff on the audit/inspection topic and scope. Audit/inspection dates are agreed to.
4	The audit/inspection plan is approved by Blair and sent to Frank, who obtains the necessary review and approvals from the responsible HLWRS Branch Chief, the responsible Technical Project Manager, and OGC. Significant changes to the audit/inspection plan will be discussed with RIV.
5	RIV, as the lead, conducts the audit/inspection. A technical reviewer participates to the level determined by HLWRS management. Outside participation is determined by OGC. An entrance and exit is conducted with DOE.
6	After the audit/inspection, a technical briefing is provided by RIV to HLWRS and OGC of the findings.
7	RIV writes a report to HLWRS using IMC 0610 as guidance. Blair approves the report and forwards the report to OGC for concurrence. The report is made publicly available as determined by OGC.
8	RIV processes potential violations.
9	RIV tracks audits/inspections by topic and status (i.e. complete, in-process, on-hold, etc)

## ENGINEERING DESIGN AUDITS/INSPECTIONS (02.03)

MC 2300 Section 02.03 Objective: “To provide guidance for the evaluation of engineering design activities to verify that ongoing facility design, drawings, calculations and instructions are being developed, reviewed and finalized consistent with commitments made in the license application and the applicant’s QA program.”

The following process is proposed to implement this objective in MC 2300:

STEP	ACTION
1	RIV and the Onsite Representatives meet with DOE to obtain a status of the design of the various buildings that will be handling spent fuel or the casks.
2	Based on schedule and the importance of the building, RIV and the Onsite Representatives develop a recommended list of inspections that will monitor design engineering activities over the period the license application will be under review.
3	Blair reviews the list, then send the recommendations with the list of inspections to Frank, who will coordinate a review with HLWRS personnel and provide comments back to Blair. Blair resolves comments with HLWRS resulting in a final list of proposed audits/inspections.
4	Blair assigns his staff to develop audit/inspection plans for the agreed areas, reviews the audit/inspection plans, and determine reasonable dates for the audits/inspections.
5	The audit/inspection plans are approved by Blair and sent to Frank, who obtains the necessary review and approvals from the responsible HLWRS Branch Chief, the responsible Technical Project Manager, and OGC. Significant changes to the audit/inspection plan will be discussed with RIV.
6	RIV, as the lead, conducts the audit/inspection in accordance with the proposed schedule. Outside participation is determined by OGC. An entrance and exit is conducted with DOE.
7	After the audit/inspection, a technical briefing is provided by RIV to HLWRS and OGC of the findings.
8	RIV writes a report to HLWRS using IMC 0610 as guidance. Blair approves the report and forwards the report to OGC for concurrence. The report is made publicly available as determined by OGC.
9	RIV processes potential violations.
10	RIV tracks the audits/inspections by topic and status (i.e. complete, in-process, on-hold, etc)
11	RIV and Onsite Representatives periodically seek updates for information related to engineering design activities. Changes impacting the inspection schedule are reported to Blair and HLWRS for adjustment to the schedule.



## FABRICATOR & VENDOR AUDITS/INSPECTIONS (02.04)

MC 2300 Section 02.04 Objective: *“To provide guidance for the evaluation of fabricator and vendor quality assurance programs for companies providing services, equipment and components for long lead time items important to safety and important to waste isolation. This may include audits/inspections at facilities where actual design, fabrication and testing is performed.”*

The following process is proposed to implement this objective in MC 2300:

STEP	ACTION
1	RIV and the Onsite Representatives meet with DOE to obtain a status of fabricator and vendor activities for long lead time items that are important to safety and important to waste isolation.
2	Based on schedule and the importance of the component, RIV and the Onsite Representatives develop a recommended list of inspections that will monitor design, fabrication and testing activities over the period the license application will be under review.
3	Blair reviews the list, then send the recommendations with the list of inspections to Frank, who will coordinate a review with HLWRS personnel and provide comments back to Blair. Blair resolves comments with HLWRS resulting in a final list of proposed audits/inspections.
4	Blair assigns his staff to develop audit/inspection plans for the agreed areas, reviews the audit/inspection plans, and determine reasonable dates for the audits/inspections.
5	The audit/inspection plans are approved by Blair and sent to Frank, who obtains the necessary review and approvals from the responsible HLWRS Branch Chief, the responsible Technical Project Manager, and OGC. Significant changes to the audit/inspection plan will be discussed with RIV.
6	RIV, as the lead, conducts the audit/inspection in accordance with the proposed schedule. Outside participation is determined by OGC. An entrance and exit is conducted with DOE.
7	After the audit/inspection, a technical briefing is provided by RIV to HLWRS and OGC of the findings.
8	RIV writes a report to HLWRS using IMC 0610 as guidance. Blair approves the report and forwards the report to OGC for concurrence. The report is made publicly available as determined by OGC.
9	RIV processes potential violations.
10	RIV tracks the audits/inspections by topic and status (i.e. complete, in-process, on-hold, etc)
11	RIV and Onsite Representatives periodically seek updates for information related to fabricator and vendor activities. Changes impacting the inspection schedule are reported to Blair and HLWRS for adjustment to the schedule.

## ALLEGATIONS (02.05)

MC 2300 Section 02.05 Objective: *“To evaluate allegations that information provided in the licensee application is not complete or accurate per 10 CFR 63.10.”*

The following process is proposed to implement this objective in MC 2300:

<b>STEP</b>	<b>ACTION</b>
1	An allegation is received by RIV, the Onsite Representatives, or HLWRS staff
2	The allegation is processed in accordance with NRC policy and procedures for allegations.
3	If a site visit is required or the issue can be encompassed into an audit/inspection, the allegation follow-up is performed by RIV or the onsite Representatives. If the allegation is related to the license application review and can be followed-up by HLWRS staff using existing available documents, the follow-up is performed by HLWRS. Blair and Melanie make a decision on who will be assigned the allegation follow-up. Based on whether RIV vs HLWRS conducts the follow-up, will dictate which ARB is responsible for processing the allegation.
4	Allegation close-out will be conducted in accordance with agency policy and procedures on handling allegations.