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March 11, 2010
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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Dr. James Rubenstone
11545 Rockville Pike
Mailstop: EBB-2-B02; Room E-2C20
Rockville, MD 20852

Subject: Quality Assurance Manual Rev 6 Chg 0 (Intermediate Milestone 14002.01.021.020)

Dear Mr. Rubenstone:

The Geosciences and Engineering Division has issued Rev 6 of its Quality Assurance (QA) Manual. In addition to relatively minor updates, this revision describes a reorganization of the quality assurance (QA) support function of the Geosciences and Engineering Division.

Historically, the QA organization has been led by a director. Recent changes in tasking and associated funding, however, have required reconsideration of staffing this function in this manner. More specifically, with less than one full-time equivalent of work having a full-time quality assurance staff member—let alone at the director level—cannot be justified. Making a change at this time is motivated additionally by the retirement of Robert Brient in late April 2010. In the context of these programmatic and individual developments, we have reassessed the level and types of effort necessary to effectively and efficiently implement the QA program.

In developing an approach for an effective QA organization, we considered the guidance from the U.S. Nuclear Regulatory Commission (NRC) Review Plan for High-Level Waste Repository Quality Assurance Program Descriptions. Pertinent sections of that guidance document state that organizations must “identify a management position ... that retains overall authority and responsibility for the QA program. This position, occupied by an individual with appropriate management and QA knowledge and experience, has the following characteristics: (i) is at the same or higher organizational level as the highest line manager directly responsible for activities affecting quality and is sufficiently independent from cost and schedule; (ii) has effective communication channels with other senior management positions; (iii) has responsibility for approval of QA manual(s), changes thereto, and interpretations thereof; and (iv) has no other duties or responsibilities unrelated to QA that would prevent full attention to QA matters.”

The intent of the guidance can be achieved by designating the Geosciences and Engineering Division vice president as the QA management representative. The vice president would be assisted by knowledgeable and experienced QA specialists reporting directly to him. In general, the portions of the manual previously identifying responsibilities of the director of QA are changed to indicate those as responsibilities of the QA staff.



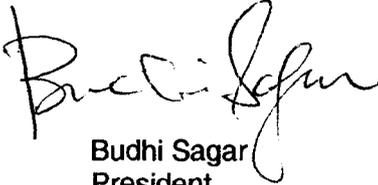
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The revision satisfies Intermediate Milestone 14002.01.021.020. While the change in organizational approach is significant, we do not consider it to be a reduction in commitment of the QA manual because (i) no QA responsibilities are reduced and (ii) the QA staff will report directly to the Geosciences and Engineering Division vice president. The Geosciences and Engineering Division vice president will remain responsible for the overall implementation and effectiveness of the QA program.

Please contact Robert Brient at 210.522.5537 or me at 210.522.5158 if you have questions regarding this matter.

Sincerely yours,



Budhi Sagar
President

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