



Department of Energy

Washington, DC 20585

NOV 7 1986

WM DOCKET CONTROL
CENTER

'86 NOV 12 A11:36

Mr. John J. Linehan
Repository Projects
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Linehan:

Thank you for the opportunity to review and comment on the following Draft Generic Technical Positions (DGTP):

1. Peer Review for High-Level Nuclear Waste Repositories, June, 1986
2. Qualification of Existing Data for High-Level Nuclear Waste Repositories, June, 1986
3. Items and Activities in the High-Level Geologic Repository Program Subject to 10 CFR 60 Quality Assurance Requirements, July, 1986

Attached are the DOE comments and suggested changes or clarifications to the DGTPs.

Looking back over the many discussions our two organizations have had in the past few years regarding the assurance of quality in the High-Level Waste Program, it is obvious that our common goal is public safety through quality. In that spirit, our comments are meant to clarify issues rather than to create controversy.

Generally, the DGTPs address the topics adequately; however, they are more prescriptive than we had expected them to be. On a number of occasions the staff has stated that, because of its first-of-a-kind nature, the regulatory guidance pertaining to the high-level waste management program would have to be more performance-oriented rather than prescriptive. There are some places in the DGTPs, however, where this thought has not been successfully implemented.

As we have indicated previously, DOE believes that the designation of 0.5 rem as the limiting off-site dose resulting from a design basis accident is an unprecedented regulatory requirement with no foundation in the assurance of public health and safety; detailed discussion of that subject, however, will be reserved for another time.

8612020109 861107
PDR WASTE
WM-1 PDR

WM Record File

108.15

108.17

108.1

WM Project 1

Docket No.

PDR ✓

LPDR

Distribution:

x J. Linehan

x L. Riddle

x J. Kennedy

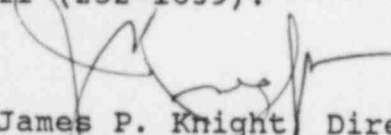
S. Bilhorn

(Return to WM, 623 SS)

Sac

In addition, we believe the concept of including activities on the "Q-List" is not adviseable since the design requirements that are appropriate for structures system and components on the "Q-List" are not germane. We instead propose providing NRC with a separate list of those activities which relate to structures, systems and components important to safety and waste isolation. Also, in the DGTP on Peer Review, the concept for independence of funding of peer reviewers is confusing and is not practicable.

If you have any questions or would like to have a meeting to discuss these comments, please feel free to contact me or Karl Sommer of my staff (252-1639).



James P. Knight, Director
Siting, Licensing & Quality
Assurance Division, Office of
Civilian Radioactive Waste Management

cc w/att: State and Tribal QACG Representatives (List attached)

State and Tribal Representatives to QACG

Mr. J. Herman Reuben, Chairman
Nez Perce Tribal Executive Committee
Box 305, Main Street
Lapwai, ID 83540

Mr. Kendall Hall, Chairman
Board of Trustees
Umatilla Confederated Tribes
P. O. Box 638
Pendleton, OR 97801

Mr. Melvin R. Sampson, Chairman
Yakima Tribal Council
Yakima Indian Nation
P. O. Box 151
Toppenish, WA 98948

Mr. Terry Husseman
Program Director
Office of High-Level Nuclear
Waste Management
Washington State Department
of Ecology, MS PV-11
Olympia, WA 98504

Mr. Max S. Power
Washington State Institute for
Public Policy
Science and Technology Project
The Evergreen State College
4111 Seminar Building TA-00
Olympia, WA 98505

Mr. Steve Frishman, Director
Nuclear Waste Program Office
Office of the Governor
201 E. 14th Street, Room 205
Austin, TX 78711

Mr. Robert Loux, Jr.
Director
Nuclear Waste Project Office
Office of the Governor
Capitol Complex
Carson City, NV 89710

Ms. Susan Zimmerman, Geologist
Nuclear Waste Program Office
Office of the Governor
P. O. Box 12428
Austin, TX 78711

Mr. James Reed
Advisory Committee on Institutional
Government Relations
P. O. Box 13206
Austin, TX 78711

Ms. Cheryl Runyon
National Conference of State Legislatures
1050 17th Street
Suite 2100
Denver, CO 80265

Mr. Carl Johnson
Nevada Nuclear Waste Storage
Investigation
State of Nevada Capitol Complex
Carson City, NV 89710

Mr. Don Provost
Ofc. of High Level Nuclear Waste
Management
Department of Ecology
Mail Stop P.V. -11
5820 Pacific Avenue
Lacey, WA 98503

Mr. Stephen S. Hart
Council of Energy Resource Tribes
1580 Logan Street, Suite 400
Denver, CO 80203

Mr. Hal Aronson
Nuclear Waste Program
Yakima Indian Nation
5041 West Fair Avenue
Littleton, CO 80123

Mr. Robert Mooney
State of Washington
Dept. of Social & Health Services
Office of Radiation Protection
MS LE-13
Olympia, WA 98504

Mr. William Burke
Nuclear Waste Project Director
Umatilla Confederated Tribes
P. O. Box 638
Pendleton, OR 97801

ATTACHMENT #1
DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION:
PEER REVIEW, JUNE, 1986

Page 1 of 4

ITEM	COMMENT	SUGGESTED CHANGE/CLARIFICATION
<u>General Comments</u>		
1.	It should be made clearer that this GTP is only one method of assessing the adequacy of work.	See specific comments (Nos. 3, 5 and 6)
2.	References to salary, performance reviews, funding and financial stake are considered inappropriate and too prescriptive. It should be the responsibility of the person requesting the Peer Review to determine and <u>document</u> the independence of Peer Reviewers.	See specific comments (No. 11, 19 and 21)
<u>Specific Comments</u>		
3.	Page 1, Sect. I, para. 1: The paragraph appears to be contradictory in that it states: "Peer reviews <u>may</u> be employed..." then later in the paragraph it states "Peer reviews <u>are</u> the mechanism..."	Change latter statement to read: "Peer reviews are a mechanism" Also see comment #5.
4.	Page 1, Sect. I, Para. 1, Line 12: "Inherent"; appears to be inappropriate. Not all geotechnical data and analysis are subject to uncertainty.	Change "inherent" to "potential".
5.	Page 1, Sect. I, para. 1, last sentence: Peer reviews are one of the methods by which judgments are made.	Rewrite last sentence to state: "Peer reviews are a mechanism to aid in making these judgments."
6.	Page 1, Sect. I, para. 2: This paragraph should be reworded to provide clarification.	"This GTP provides a definition of peer reviews and provides guidance on areas where a peer review is appropriate, the qualifications of peers, and the conduct and documentation of a peer review. Other methods of assessing adequacy of work may be proposed or used on technical data and documents required in the licensing process and will be reviewed for acceptability by the NRC on a case-by-case basis."
	Page 2, Sect. II, top line: "State-of-the-art" should be defined. For example, "state-of-the-art" equipment does not necessarily mean it is unproven, simply that it is the best available.	This phrase should be changed to read "beyond the state-of-the-art."

ITEM	COMMENT	SUGGESTED CHANGE/CLARIFICATION
8.	Page 2, Sect. III, Peer: "a person knowledgeable in the subject matter" should be more clearly defined.	Change to read: "A peer is a person having technical expertise in the subject..."
9.	Page 2, Sect. III, Peer Review Group: Specifying the minimum number of peer reviewers in a group is inappropriate and should be deleted.	Delete the last sentence.
10.	Page 2, Section III, Peer Review: The first sentence should be clarified. If "personnel" is changed to "peers" then the last part of the sentence can be deleted.	First sentence should read: "A peer review is a documented critical review performed by peers who are independent of the work being reviewed."
11.	Page 2, Section III, Peer Review, para. 1: "Funding" in the last sentence should be deleted as it is understood that DOE will fund peer reviews.	Delete reference to "funding."
12.	Page 3, Section IV, 1a, b & c: Three different terms are used: "should be used", "is appropriate or necessary", "is recommended." These are confusing and should be consistent.	Make these terms consistent by using "should be used."
13.	Page 3, Section IV, 1b: Clarify first item to quantify "uncertainty." To eliminate <u>all</u> uncertainty may be impossible.	Add "significant" before "uncertainty"
14.	Page 3, Section IV, 1b: Re-word second item to qualify that these decisions and interpretations have been made in the face of uncertainty.	Second item to read: "Decisions or interpretations having significant impact on performance assessment conclusions when such decisions and interpretations have been made in the face of significant uncertainty."
15.	Page 3, Section IV 1b: The last item in section b. should be clarified to use the last part of item as an example.	Last item should read: "Data adequacy is questionable --such as, data may not have been collected in conformance with an established QA program."
16.	Pages 3 and 4, Section IV: The following terms need to be defined to clarify use and to avoid controversy: "Ambiguous" - Section IV.1.b, 10th line "Professional stature" - Sect. IV, 2nd para. "ability to span the technical issues" - Sect. IV, 2nd para. "major schools of scientific views" - Sect. IV, 2nd para. "recognized technical credentials" - Sect. IV, 3.a., 1st line "prestige" - Sect. IV, 3.a., 5th line "eminent scientist" - Sect. IV.3.b., 1st line	DOE understands these terms to be generic.

ATTACHMENT #1
DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION:
PEER REVIEW, JUNE, 1986

Page 3 of 4

ITEM	COMMENT	SUGGESTED CHANGE/CLARIFICATION
	"general scientific consensus has been reached regarding the validity of their earlier work" - Sect. IV.3.b, 3rd line "differing viewpoints" - Sect. IV.2, 1st para.	
17.	Page 4, Sect. IV.3.a, 2nd sentence: Clarify last part of sentence to be consistent with definition of peer.	Reword sentence to read: "The technical qualifications of the peer reviewers in their review areas should be at least equivalent to that needed for the original work."
18.	Page 4, Sect. IV.3.b.(b): This part should be deleted. The requirement is outside the qualification criteria and does not provide any added assurance of objectivity when dealing with professionals in the realm of technical issues. In addition, it would be very difficult to document and/or demonstrate for credibility.	Delete part (b)
19.	Page 4, Sect. IV.3.b. last sentence in first paragraph: This sentence should be deleted. It is understood that DOE will fund the original work as well as any peer reviews of it.	Delete sentence
20.	Page 4, Sect. IV.4, 4th line in 1st para.: Adequacy of requirements and criteria should be added to listing.	Add to listing: "Adequacy of requirements and criteria."
21.	Page 4, Section IV, 5, 4th and 5th sentences: These two sentences are redundant.	Delete the 5th sentence.
22.	Pages 4&5, Sect. IV, 1st para. last sentence: Reference to salary, funding, and performance reviews should be deleted. This requirement is outside qualification criteria and does not provide any added assurance of objectivity.	Delete sentence
23.	Page 5, Sect. IV, 2nd para.: This paragraph should be deleted. The statement is already made in the 1st para., 6th line.	Delete second paragraph
24.	Page 5, Section V, 2nd para., 2nd & 3rd sentences: These two sentences contradict the last sentence in the 1st paragraph. Scientific uncertainties exist but technical judgments must still be made. A peer review lends additional confidence to those judgements.	Delete the 2nd and 3rd sentences in the 2nd paragraph.

ATTACHMENT #1
DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION:
PEER REVIEW, JUNE, 1986

Page 4 of 4

ITEM	COMMENT	SUGGESTED CHANGE/CLARIFICATION
25.	Page 5, Section V, 3rd paragraph: This paragraph should be clarified to state that the QA organization will overview the peer review process. Overview will include audits and surveillance of the peer review process and review of implementing plans and procedures.	Clarify paragraph

ATTACHMENT #2
DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION:
QUALIFICATION OF EXISTING DATA, JUNE, 1986

Page 1 of 1

ITEM	COMMENT	SUGGESTED CHANGE/CLARIFICATION
1.	Page 1, Sect. II, second from last sentence: "... currently ..." implies that these methods may be unacceptable at some future time. This is an unacceptable concept and should be revised.	Delete "currently."
2.	Page, 2, Sect. II, <u>Qualified Data</u> : The definition of Qualified Data is not compatible with the intent of this GTP. This would not permit existing data to be "qualified" without meeting 10 CFR 60, Subpart G requirements.	Add the following after "program": "or existing data that is qualified in accordance with this GTP."
3.	Page 2, Sect. III, <u>Existing Data</u> : Data presented in technical and scientific articles should be included in this definition.	Add the following after "universities": "or in technical or scientific publications."
4.	Pages 2 and 3, Sect. IV and V: The term "non-qualified data" is used throughout these sections. The defined term is "existing data."	Change "non-qualified data" to "existing data" (9 places)
5.	Page 2, Sect. IV.1: This paragraph could be deleted as it was already stated in Section II, Regulatory Framework.	Delete Section IV.1.
6.	Page 2, Sect. V. A: In the first sentence "the use of peer reviews" should be clarified to read "the use of a peer review process." This is a broader term to include the decision process to use a peer review, procedures to be used and the results of the peer reviews.	Change end of sentence to read: "...the use of a peer review process."
7.	Pages 2 and 3, Sect. V. A., 2nd paragraph: This sentence concerning attributes to be considered for qualification applies not only to peer review but also the other methods of qualifying existing data.	Move this sentence to Sect. V under <u>Discussion</u> .

DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION
 ITEMS AND ACTIVITIES IN THE HIGH-LEVEL WASTE GEOLOGIC REPOSITORY PROGRAM
 SUBJECT TO 10 CFR 60 QUALITY ASSURANCE REQUIREMENTS (JULY, 1986)

ITEM	COMMENT	SUGGESTED CHANGE/CLARIFICATION
	<u>General Comments</u>	
1.	<p>The identification of an item on the Q-List has specific design implications, e.g., ability to withstand seismic events. (60.131). These design requirements have no meaning for activities such as site characterization testing. This anomaly has led to difficulties in implementing the QA program. DOE will be proposing that the Q-List be limited to hardware items only. DOE will develop a methodology for defining which activities will be subject to Subpart G QA requirements. This approach will require a change in definitions and in other places in the GTP as noted.</p>	<p>The following is the suggested definition for "Activities" as noted on Page 4, Section 4.0 "Activities" are deeds, actions, work, or performance of a given function. With respect to a geologic repository, activities include such things as site characterization, facility and equipment construction, facility operation performance confirmation and assessment, permanent closure, and decontamination and dismantling of surface facilities (60.151), as well as designing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, and modifying (50 App. B, Introduction).</p> <p>All activities related to structures, systems, and components important to safety and to engineered barriers important to waste isolation should be subject to graded quality procedures commensurate with the item's safety function. No activities should be placed on the Q-list. However, activities should be compiled on a "Quality Activities List" and should include those related to structures, systems, or components important to safety or to engineered barriers important to waste isolation.</p>
2.	<p>This Draft GTP, either directly or by implication, can be read as having <u>predetermined</u> certain items as being on the Q-List. Examples: page 4, 4.0 Activities - "exploratory shaft testing" page 4, 4.0 Barriers - "shafts, boreholes" page 13.6.1(c) last para. - entire paragraph It is recommended that any predetermination be avoided.</p>	<p>Page 5, Section 4.0, "Q-List", delete "... and related activities...". Page 4, 4.0 "Barrier" delete "(including bulkheads and seals)" Page 13, 6.1(c) last para., delete "(e.g., materials...)"</p>

DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION
ITEMS AND ACTIVITIES IN THE HIGH-LEVEL WASTE GEOLOGIC REPOSITORY PROGRAM
SUBJECT TO 10 CFR 60 QUALITY ASSURANCE REQUIREMENTS (JULY, 1986)

ITEM	COMMENT	SUGGESTED CHANGE/CLARIFICATION
	<u>Specific Comments</u>	
3.	There are cases where the language apparently "changes the rules" as the concept of credible accidents is discussed. In the context of this GTP the words "prevented", "credible", and "with certainty" are not considered interchangeable. Examples: p.13, para 6.2, p. 25, 1st paragraph.	It is recommended that <u>one concept</u> and <u>one word</u> be used throughout with the result that <u>only one "rule"</u> is being articulated. For consistency with Part 60, we suggest that "credible events" be used.
4.	There is a major concern relative to the concept of "credible accidents" in the following paragraphs: - page 7, Section 5.2(a), last paragraph - page 13, Section 6.2, first para., 3rd sentence - page 15, Section 6.2(a)(2), last para., 2nd sentence On page 7, the concept of credible accidents appears to be set aside but it is included on pages 13 and 15.	Page 7, Section 5.2(a) delete "... irrespective of the probability of failure,..." page 7, Section 6.2, first paragraph, delete "... (made not credible)" page 16, 1st line, delete "... So unlikely as to be incredible." and add "... sufficiently unlikely."
5.	A major concern is the use of 0.5 rem as the dose limit for design basis accidents. The whole body dose of 0.5 rem is specified in 10 CFR 20 as the off-site dose limit for normal operation. To use the same dose limit for both normal operations and design basis accidents is unduly restrictive and inconsistent with previous NRC practice. DOE will propose a 5.0 rem off-site dose limit for design basis accidents. The supporting position is extensive and will be the subject of a separate communication.	Page 6, Section 5.2, delete second sentence "The design basis..." Page 13, Section 6.2, delete 4th sentence "Therefore the 0.5..."
6.	It is clear from this draft generic technical position that use of event/fault trees is mandated by the NRC. This may be overly prescriptive in that it focuses on one technique among several alternatives. For example, another structured approach called MORT (Management Oversight and Risk Tree) has been, and is used by DOE as the standard accident investigation method for all DOE facilities.	Page 6, Section 5.2(a)(1), second sentence should state "Fault trees, event trees, MORT or similar structured analytical methods, should be utilized in system modeling."

DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION
ITEMS AND ACTIVITIES IN THE HIGH-LEVEL WASTE GEOLOGIC REPOSITORY PROGRAM
SUBJECT TO 10 CFR 60 QUALITY ASSURANCE REQUIREMENTS (JULY, 1986)

<u>ITEM</u>	<u>COMMENT</u>	<u>SUGGESTED CHANGE/CLARIFICATION</u>
7.	It is recommended that the terms "important to safety" and "important to waste isolation" be clearly defined once in the text and in the Glossary. These terms are defined several times throughout the text and the definitions are not always the same. The GTP should use the legal definitions from the regulations.	
	<u>Specific Comments</u>	
8.	Barriers which contribute to meeting the containment and isolation requirements of 10 CFR 60 are not necessarily "important to waste isolation". Only those that are essential to meeting the requirements, or for which credit is taken, are "important to isolation." (Refer to 10 CFR 60.2 "Important to Safety").	"In the post-closure phase, the engineered barriers that are essential, or for which credit is taken, for meeting the containment and isolation requirements of 10 CFR 60 are defined as important to isolation." Page 18, Section 6.3, 10th line, change "The items and activities ... and <u>should</u> include:" to "... and <u>may</u> include:"
9.	Section 2 implies that as a result of many years of reactor licensing experience the NRC and industry have developed a body of practice for developing Q-lists which identify all safety related items, and that such lists include "a series of design basis accidents, a source term for release of radionuclides to the atmosphere, and meteorological conditions to be assumed during an accident." In reactor licensing, in fact, the Q-list is a list of quality components (hence Q-list); these components are assigned varying levels of quality depending on their contribution to safety, or on the risk to the public health and safety associated with their failure. Hypothesized accident conditions, source terms, or meteorological parameters are used to assess the safety of the facility under severe conditions and they are treated corresponding to assigned levels of quality but are not themselves on a Q-list.	Delete the fifth sentence ("For example, a series of design basis accidents...") in the first paragraph.

DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION
ITEMS AND ACTIVITIES IN THE HIGH-LEVEL WASTE GEOLOGIC REPOSITORY PROGRAM
SUBJECT TO 10 CFR 60 QUALITY ASSURANCE REQUIREMENTS (JULY, 1986)

<u>ITEM</u>	<u>COMMENT</u>	<u>SUGGESTED CHANGE/CLARIFICATION</u>
10.	Reference to the EPA standards should be deleted as they will be included in the proposed revision to 10 CFR 60.	Page 3, Section 3.0, delete "(10 CFR 60.112) and add ", as proposed to be incorporated in 10 CFR 60 (51 FR 22288).
11.	<p>Page 3, Section 3.0, 2nd paragraph: The Draft GTP states that "DOE (shall) apply a QA program based on the criteria of 10 CFR 50 Appendix B as applicable and appropriately supplemented..." to "...all systems, structures and components important to safety, to design and characterization of barriers important to waste isolation and to activities related thereto" (10 CFR 60.151)</p> <p>By contrast, 10 CFR 60.152 states that "DOE shall <u>implement</u> a quality assurance program based upon the criteria of Appendix B of 10 CFR 50 as applicable, and as appropriately supplemented by <u>additional criteria as required by 60.151.</u>" (We have underlined the regulation wording that is different than the Draft GTP). 60.151 requires that the QA program "applies to all structures systems and components important to safety, to design and characterization of barriers important to waste isolation and to activities related thereto."</p> <p>A few observations are appropriate.</p> <ol style="list-style-type: none"> 1. The GTP seems to be citing 10 CFR 60.151. However, the language is taken, in part, from 10 CFR 60.152. 2. The language in the GTP is not the exact language of the regulation (See underlined words above). This invites misinterpretation. 3. It is our interpretation of 10 CFR 60.151 that it limits the QA program to things which are important to safety or waste isolation. 	<p>Page 3, Section 3.0, change the second sentence as follows: "... necessary to provide adequate confidence that the systems, structures, and components important to safety and engineered barriers important to waste isolation of the geologic..." Change first sentence as follows: "... as applicable and appropriately supplemented" (10 CFR 60.150) to "all systems ..."</p>

DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION
ITEMS AND ACTIVITIES IN THE HIGH-LEVEL WASTE GEOLOGIC REPOSITORY PROGRAM
SUBJECT TO 10 CFR 60 QUALITY ASSURANCE REQUIREMENTS (JULY, 1986)

<u>ITEM</u>	<u>COMMENT</u>	<u>SUGGESTED CHANGE/CLARIFICATION</u>
	By contrast, we construe the GTP as requiring QA for a broader spectrum of program elements. The GTP appears to require QA for all the repository, its subsystems, and components which will enable the repository to perform satisfactorily in service (page 3, para. 2).	
12.	Page 4, Section 4.0, Definitions: The Draft GTP includes definitions which are inconsistent with 40 CFR 191 and 10 CFR 60. The definition for "Barriers Important to Waste Isolation" cannot be more global than the definition for "Barrier".	In definition of "Barrier" delete the parenthetical statement "(including bulkheads and seals)." Change the definitions for "Barriers important to waste isolation" to "Barriers important to waste isolation are those engineered barriers that are essential, or for which credit is taken for, meeting the containment and isolation requirements of 10 CFR 60".
13.	Page 5, Section 5.1(b): The second sentence ("while these items") is confusing because the term "requirements" is used twice but with different meanings.	Revise sentence to read: "While these items and activities are not subject to the QA requirements in 10 CFR 60 Subpart G, DOE should implement a program to assure compliance with those aspects of 10 CFR 60 which apply to items other than structures, systems, and components important to safety and engineered barriers important to waste isolation."
14.	Page 8, Section 5.4(b), last sentence: This sentence requires in the SCP "... a schedule for refinement of the preliminary Q-list based on design advancements and collection of new information." It is not clear that such a schedule can be constructed at the time of filing the SCP with sufficient confidence to be of use to the NRC, nor has NRC identified the regulatory purpose of such a schedule.	Delete the last sentence of the first paragraph of Section 5.4(b)

DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION
ITEMS AND ACTIVITIES IN THE HIGH-LEVEL WASTE GEOLOGIC REPOSITORY PROGRAM
SUBJECT TO 10 CFR 60 QUALITY ASSURANCE REQUIREMENTS (JULY, 1986)

<u>ITEM</u>	<u>COMMENT</u>	<u>SUGGESTED CHANGE/CLARIFICATION</u>
15.	Page 9, Section 5.4(b), 1st full paragraph: The first sentence states that "All site characterization activities should be considered to be within the scope of the 10 CFR 60 Subpart G QA program, unless DOE can demonstrate they are not related to items important to safety or waste isolation." This is too global a requirement. Testing and collection of data needed for design optimization, for example, need not be covered by 60.151. The decision whether a given item or activity must be subject to 60.151 requirements must be left to the judgment of the DOE; a judgment which the NRC will certainly wish to monitor.	Delete the first sentence of the second paragraph of Section 5.4(b): "All site..."
16.	Page 9, Section 5.4(b) last paragraph: The paragraph should be omitted. We are unable to identify a regulatory basis for requiring DOE to describe in the SCP their plans to develop and implement a program to assure and document conformance with non Q-list requirements. In addition, this GTP is not the appropriate document to address the requirements of the SCP.	Delete last paragraph of Section 5.4(b)
17.	Page 12, Section 6.1(c), first paragraph: A statement should be inserted in this paragraph to allow acceptance of work done by DOE, project contractors, research labs, universities, etc., that worked under DOE Level II Programs without having to qualify the information or data gathered. Some information may be needed for licensing which predates either the DOE Level II Program or 10 CFR 60 Subpart G. Such information should be reviewed for licensability. It is suggested that, on line 10 of this paragraph the "Subpart G QA" be expanded to include DOE Level II program.	Insert the following after the second sentence: "Information collected under QA Programs that satisfy QA requirements of DOE's Level II programs may be acceptable to NRC for non-Q-list items and related activities used to support licensing findings."
18.	Page 14, Section 6.2(a)(1), 2nd paragraph The requirement to identify "all conceivable events" is difficult if not impossible.	Suggest deletion of "all" conceivable and, in next sentence, delete "all".

ATTACHMENT No. 3DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITIONITEMS AND ACTIVITIES IN THE HIGH-LEVEL WASTE GEOLOGIC REPOSITORY PROGRAMSUBJECT TO 10 CFR 60 QUALITY ASSURANCE REQUIREMENTS (JULY, 1986)

<u>ITEM</u>	<u>COMMENT</u>	<u>SUGGESTED CHANGE/CLARIFICATION</u>
19.	Page 16, Section 6.2(a)(2), first full paragraph. In the second line the word "large" is difficult to define.	Suggest deletion of "large".
20.	Page 17, Section 6.2(d), second paragraph: Reference to a document, which has not been endorsed by DOE or NRC, could be interpreted as having tacit endorsement.	Delete this paragraph.
21.	Page 17, Section 6.2(e), Retrieval: Analyses to identify structures, systems, and components which may be important to safety during a potential retrieval operation should be prepared as part of the retrieval planning and not earlier. Since the nature of the retrieval operation may depend on conditions which make retrieval necessary, even in the face of exposures above 0.5 rem, and since the state of technology which would be utilized at that time is likely to be different from today's, early analyses would be speculative and likely of little use. What is important now is that the option for retrieval not be foreclosed. For this reason, DOE intends to apply appropriate quality procedures to those structures, systems and components whose failure could make retrieval impracticable.	Delete starting in the third line to end of paragraph "... to identify Q-list items and activities..."
22.	Page 19, Section 6.3, 3rd paragraph: In classifying items important to waste isolation, the Draft GTP indicates that DOE should refer to the "Draft Generic Technical Position on Licensing Assessment Methodology for High-Level Waste Geological Repositories." We understand that the GTP will be substantially revised, probably renamed, and published in mid-1987. It is difficult to review or respond meaningfully to the subject Draft GTP if it attempts to incorporate methodology in another document which will not be published for about one year. DOE needs to see both documents together in order to provide meaningful response to NRC on either GTP.	Delete entire paragraph.

DOE COMMENTS ON NRC DRAFT GENERIC TECHNICAL POSITION
ITEMS AND ACTIVITIES IN THE HIGH-LEVEL WASTE GEOLOGIC REPOSITORY PROGRAM
SUBJECT TO 10 CFR 60 QUALITY ASSURANCE REQUIREMENTS (JULY, 1986)

<u>ITEM</u>	<u>COMMENT</u>	<u>SUGGESTED CHANGE/CLARIFICATION</u>
23.	Page 20, Section 6.4, 1st paragraph, 2nd sentence: "Obvious or likely candidates" is inappropriate.	Please delete sentence.