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Department of Energy

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WM Project 10

REPLY TO
ATTN OF: RW-24

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Docket No.

PDR

LPDR

SUBJECT: Guidance for BWIP SCP Section 8.6, Quality Assurance

TO: John Anttonen

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At the September 9-10, 1986, review of the BWIP SCP Section 8.6, Quality Assurance, a number of issues were raised that needed resolution by DOE/HQ. This memo provides the needed guidance to BWIP. By copy of this memo, NNWSI and SRPO are also advised of the DOE/HQ position on these issues and are requested to assure that their versions of Section 8.6 conform.

The issues raised during the BWIP review and the DOE/HQ position on them are as follows:

1. Reference to draft NRC Regulations, Regulatory Guides, Branch Technical Positions, and Generic Technical Positions are not to be made.
2. A Q-List (items and activities important to public safety and waste isolation) will not be provided in Section 8.6; rather, a reference to the Q-List in Sections 6.1.4 and 6.1.5 will be made. Section 8.6 will contain only a summary of the Q-List methodology (from supplement Number 3 of the OGR QA Plan); Sections 6.1.4 and 6.1.5 will contain the Q-List and detailed rationale for how the Q-List was derived.
3. Detailed technical procedures will not be listed or described in Section 8.6.6; instead reference to Section 8.3 will be made. Section 8.3 will contain a description of the planned tests and studies to be conducted to acquire information during site characterization.
4. The governing QA document list in Section 8.6 will include NQA-1, 1986.
5. Section 8.6 is not to include any exemptions, exclusions, or clarifications to the NRC QA Review Plan. Clarifying interpretations may be set forth in other QA documents such as the project's QA Plan.
6. The description of the QA organization (Section 8.6.3) should include a short section describing OGR QA overview of the projects and OCRWM's overview of OGR. Attached is material which may be used directly or modified as desired.
7. Sections 8.6.5 and 8.6.6 are to contain a listing of administrative and QA procedures. A reference will be

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provided for each procedure listed as well as a brief description of the procedure. It is permissible to use the title of the procedure in lieu of a description if the title is sufficiently descriptive. If the title is not sufficiently descriptive, then a brief (few sentences) description shall be provided.

8. The description of the Q-List methodology should omit discussion of the methodology that DOE plans to use in deriving the Q-List that will be presented in DOE's License Application and instead describe the methodology used to arrive at the Q-List presented in the SCP. The methodology for the SCP Q-List may be based largely on engineering judgement consistent with my April 1986 "SCP and SCP-CDR Q-List Methodology " guidance; this fact may be noted.

9. Sections 8.6.4.2 and 8.6.4.3 are to be combined into 8.6.4.2.

10. Although OGR QA Plan Supplement Number 8 (Graded QA) was silent on the subject, each project is free to set requirements for all Level 3 items and activities and there is no requirement to provide written justification for deviations (since there is nothing to deviate from!).

Please contact Carl Newton on 252-5059 if you have any questions about this guidance.


Ralph Stein, Director
Engineering and Geotechnology
Division
Office of Geologic Repositories

Attachment

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HQ Overview of Project QA Activities

The DOE Headquarters QA overview responsibilities are defined in DOE Order 5700.6, the QAMPR, and the OGR QA Plan. The methods for complying with these responsibilities are listed below:

a. Develop direction and guidance for the implementation of QA policy

Headquarters direction and guidance are contained in Section 5 of the OGR QA Plan. When the need for interpretive or modified direction is identified, Headquarters will provide such direction through the issuance of QA supplements and/or revisions to the QA plan.

b. Define responsibilities and authority for QA activities

The definition of QA responsibilities and authorities for the OGR program is provided in Section 3 of the OGR QA plan.

c. Establish the scope and requirements of QA activities

The scope and QA administrative requirements of the OGR program as set forth in the OGR QA plan are reviewed for adequacy by the QA Manager. Approved changes will be incorporated into appropriate revisions to the QA plan as they occur. The QA requirements are to be amplified in the QA plans and procedures issued by the project and contractors as appropriate for their assigned responsibilities.

d. Assure funding for QA

The OGR Division Directors are primarily responsible for recommending and reviewing for QA adequacy of funds for their respective division activities. The OGR QA manager overviews the funding for QA activities and identifies insufficient resources to the Associate Director, OGR through the SLQA Division Director as a quality issue requiring management attention and/or action.

e. Review project documents

1. Review and approve project office QA plans and procedures

Each project office is to submit its QA plan and QA administrative procedures to the Associate Director, OGR, for approval. The OGR QA Manager reviews and documents the HQ-OGR approval. Pending receipt of HQ-OGR approval, the project

office may issue draft QA plans and administrative procedures for interim use provided that those to whom the documents are issued are so advised. Final project QA plans must include a signature block for approval by the Associate Director, OGR.

2. Technical reviews

HQ-OGR performs technical reviews, as appropriate, of technical plans and project status and progress reports, including related scientific/technical reports submitted by each project office. These reviews are performed in accordance with established procedures.

3. Readiness reviews

HQ-OGR participates in project readiness reviews during site characterization, construction, testing, or operation of the geologic repository. HQ-OGR reviews the project readiness review plans and readiness review reports for completeness of required actions and documentation, and for conformance with the QA program requirements.

f. Verify effective QA implementation

Verification that effective QA activities are being implemented by each project office is accomplished by HQ as follows:

1. Review and approve project office QA plans and QA administrative procedures.
2. Conduct QA audits of project offices and participate in project office audits of major contractors.
3. Review and analyze project office audit reports and issue summary and trend reports.
4. Perform design reviews; technical and/or peer reviews of such activities as design of repository, exploratory shaft, and waste package; licensing strategy; planned site characterization activities; and engineering testing.
5. Perform technical assessments of specific technical activities to determine compliance with technical procedures and QA requirements and adequacy of technical reviews and verification performed by project personnel.
6. Perform surveillance of project activities. HQ-OGR personnel are required, as part of selected planned field visits to each project office, to

perform surveillance of activities in progress covered in their mission. Results of surveillance performed will be reported to the project office.

- g. Identify QA-related issues and problems and take, or cause to be taken, effective correction action

Significant quality problems and unusual occurrences are identified, tracked, corrected, and corrective action verified.

- h. Verification that project QA programs meet QA requirements

Verification that each project QA program meets the requirements of the governing documents and the OGR QA Plan is accomplished by HQ review and approval of project office QA plans and procedures and by HQ QA audits of the project offices.

FOR OCRWM DISTRIBUTION

SUBJECT: Guidance for BWIP SCP Section 8.6, Quality Assurance

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