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MEMORANDUM FOR: BWIP Group Coordinators

FROM: John T. Greeves, Section Leader  
Design Section  
High-Level Waste Technical  
Development Branch  
Division of Waste Management

SUBJECT: REVIEW OF BWIP QUALITY ASSURANCE TECHNICAL PROCEDURES

Quality Assurance (QA), and also our review of QA programs, has basically two parts: (1) administrative procedures and (2) technical (or implementing) procedures (Figure 1). Administrative procedures are based on the 18 criteria of 10CFR50 Appendix B, which lays out the basic QA program requirements. These are generated by the quality assurance organization and apply across the board to all technical program areas. They guide the administration of a QA program (e.g., establish when and how technical procedures should be developed; specify when and how QA audits should be conducted; specify generally how data should be collected, etc.). The detailed technical (or implementing) procedures are developed by organizations responsible for each technical area following the requirements spelled out in the administrative QA procedures. These technical procedures contain instructions for actual performance of testing and investigations (e.g., hydrologic pump tests, setting a packer, etc.). Therefore, the nature of the two types of procedures are fundamentally different. Responsibilities for developing them rest in different organizations.

A draft NRC Review Plan of QA Programs for High Level Waste Repository Site Investigations has been developed (Attachment 1). The plan for NRC review of these QA programs has been divided into parts following the distinction made above. The review of the administrative procedures will be conducted by the Design Section and our QA consultants (NRR and Engineers International). This review is presently being done for the BWIP SCR. The review of the technical (implementing) procedures will be coordinated by Jay Rhoderick of the Design Section, but the responsibility for the review and evaluation of these procedures will lie

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in each of the technical program areas. For example, the geochemistry group will be responsible for reviewing the geochemistry technical procedures while coordinating their effort with the Design Section.

In order to conduct this review in a consistent and efficient manner in all program areas, we must answer some basic questions concerning implementing procedures in each program area. Attached are a series of questions intended to help identify the level of detail and timing required in each area (Attachment 2). Answers will be different in various areas, even in specific issues within an area.

It is very important that the staff begin reviewing technical procedures being used at BWIP for site characterization activities. Although the SCR did not include detailed technical procedures, some of the technical procedures being used at BWIP are contained in RHO-BWI-MA-4, which we have in-house. Attached are those technical procedures from MA-4 which apply to your respective technical area (Attachment 3). Please review these procedures for obvious problems so that comments will be available for incorporation into the SCA. In addition to this review, please identify additional test procedures which are not in MA-4 that staff in your technical program area need to see. Please provide this information to Jay Rhoderick by January 13, 1983.

**"ORIGINAL SIGNED BY"**

John T. Greeves, Section Leader  
Design Section  
High-Level Waste Technical  
Development Branch  
Division of Waste Management

**Enclosures:**

1. NRC QA Review Plan
2. Questions on Level of Detail and Timing
3. MA-4 Test Procedures -

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DATE :	1/7/83	:	1/10/83	:	1/1/83	:	1/10/83	:	:	:

## ATTACHMENT 2

### **Implementing Procedures - Questions on Level of Detail and Timing**

1. What kind of activities (i.e., tests, data analyses, etc.) is it essential to have documented, approved procedures developed for?
2. What is the level of detail (varies with each issue) needed for implementation procedures and test plans?
3. What level of NRC staff review is needed of written approved implementing procedures considering that we have limited time and resources? (i.e, where, beyond making procedures available for review which is a requirement in all cases where procedures are required to be prepared, does NRC staff intend to do reviews and comment?)
  - Review all procedures to assure they are in place?
  - Detailed review of selected important procedures for adequacy?
4. When is detailed procedure and test plan review needed (varies with each issue)?

FIGURE 1

