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MAR 2 1983

MEMORANDUM FOR: Hubert J. Miller, Chief
High-Level Waste Technical Development Branch
Division of Waste Management, NMSS

FROM: Terry L. Harpster, Chief
Quality Assurance Branch
Division of Quality Assurance,
Safeguards, and Inspection Programs, IE

SUBJECT: RESULTS OF QA BRANCH REVIEWS

On February 7, 1983, we were asked by Jay Rhoderick to review and comment on two items:

1. Engineers International, Inc's assessment of Chapter 18 of the Site Characterization Report (SCR) concerning BWIP quality assurance.
2. The table of contents and some of the procedures under the maintenance responsibility of Rockwell's BWIP QA organization of Rockwell's "Basalt Operating Procedures."

We have reviewed both items and our comments follow. The assessment by Engineers International is basically a request for more information. You may recall that we supplied you a similar request by memorandum from W. P. Haass dated December 7, 1982. We have no quarrel with the results of Engineers International request, and, in some areas, the concerns of Engineers International closely parallel ours. For example, section 18.1 of Engineers International's request expresses concern over the autonomy of the QA program in that "the BWIP Project Manager ... verifies that the principal contractors ... are effectively implementing their quality assurance programs." We express the same concern in our item 4 which says: "Provide a commitment that verification of conformance to established requirements is accomplished by personnel within the QA organizations."

In other areas, Engineers International has requested more detail than required by our "Review Plan" which was included in your letter to DOE of November 4, 1982. While additional information as requested by Engineers International is of interest, we do not believe it is required. Further, if another organization was requested to review and comment on Chapter 18 of the SCR, it is likely that another set of questions would be generated which would differ from both our questions and Engineers International questions. We believe an acceptable response to our questions of December 7, 1982 will define an acceptable QA program for the BWIP site characterization.

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Rockwell's "Basalt Operating Procedures" is a lower tier document than the SCR. The procedures are more voluminous and more detailed than the SCR. Procedure A-2 indicates that there is at least one other document (Policies Manual, RHO-MA-100) between the SCR and the procedures. Procedure A-8 indicates there is also a BWIP QA Program plan in the document hierarchy. The QA Branch does not normally review documents at the procedure level as this is normally the responsibility of NRC Regional personnel who inspect to verify implementation of an NRC-accepted program. We have reviewed the information supplied (i.e., the Table of Contents and procedures A-2, A-3, A-7, A-8, D-4, D-5, G-2, and G-3) and we note that a number of procedures show no issue date in the table of contents. Obviously procedures covering the work should be available before the work begins. Section 6.2.1 of procedure A-3 states that personnel "shall be responsible for working to the procedures as approved...." It is difficult to visualize a properly functioning program with adequate controls without some of the procedures that show no issue date as of June 30, 1982. One would hope that such procedures have been issued and are being implemented presently.

The procedures themselves look to be generally acceptable, but a review by a qualified NRC Regional inspector would probably be more meaningful.

If you require additional assistance in the area of QA, please contact me or Jack Spraul of my staff (x24530).


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