

**SUMMARY OF THE
U.S. NUCLEAR REGULATORY COMMISSION / U.S. DEPARTMENT OF ENERGY
QUARTERLY MANAGEMENT MEETING
IN ROCKVILLE, MARYLAND
NOVEMBER 22, 2004**

Introduction

The U.S. Nuclear Regulatory Commission (NRC) and U.S. Department of Energy (DOE) held a public quarterly management meeting on November 22, 2004. The purpose of this meeting was to discuss the overall progress of the project at the proposed geologic repository site at Yucca Mountain (YM), Nevada. The meeting was hosted at the NRC Headquarters in Rockville, Maryland, with audio connections to the Center for Nuclear Waste Regulatory Analyses (CNWRA) in San Antonio, Texas, and to the DOE offices in Las Vegas, Nevada. Other participants included representatives from NRC Region IV, the State of Nevada, the Nevada Nuclear Waste Task Force, Public Citizen, the press, and interested members of the public.

The NRC issued the notice for this public meeting on November 4, 2004. The meeting notice is available in the NRC Agencywide Documents Access and Management System (ADAMS) at Accession No. ML043090582.

NRC Opening Remarks

Mr. Jack Strosnider, Director, Office of Nuclear Materials Safety and Safeguards, NRC started the meeting by welcoming DOE managers, members of the public, and all other stakeholders.

He acknowledged that DOE might not be able to submit a license application (LA) for a geologic repository at Yucca Mountain, Nevada, by December 2004. He said that EPA had not specifically stated when and how it would revise its YM standard. He also said NRC would amend 10 CFR Part 63 to be consistent with any EPA revisions to the YM standard and that interested parties would have the opportunity to submit public comments in any rulemaking.

Mr. Strosnider noted that in August 2004 the Pre-license Application Presiding Officer (PAPO) Board granted the State of Nevada's motion to strike DOE's licensing support network (LSN) certification, and in September 2004, DOE filed a Notice of Appeal with the Commission to overrule a portion of the PAPO Board's August 31, 2004 order. He said DOE had indicated it would comply with those portions of the order that it did not appeal. On November 10, 2004, the Commission issued an order holding DOE's appeal in abeyance. Mr. Strosnider reminded the audience that, according to NRC regulations in 10 CFR Part 2, the staff cannot docket the LA until at least 6 months have elapsed from the time of DOE certification. He said NRC is interested in hearing from DOE about DOE's schedule for completing activities leading up to a DOE LSN certification and for submitting an LA.

Mr. Strosnider concluded by noting that the President's budget request for FY 2005 includes significant increases for the NRC's LA review, for the high level waste information technology and information management (IT/IM) metasystem, and for the NRC public hearing. He stated

that any decision to fund NRC below requested levels would adversely impact NRC's schedule for reviewing the LA.

NRC Program Update

Mr. C. William Reamer, Director, Division of High-level Waste Repository Safety, NRC, presented the NRC program update. Mr. Reamer began by discussing key technical issue (KTI) agreements. He noted that DOE submitted its responses to all 293 KTI agreements by August 31, 2004. He said 124 KTI agreements had been completed and the staff was currently reviewing 169 KTI agreement responses. He stated that the staff plans to give DOE feedback on DOE's responses to high-risk-significance agreements by the end of December 2004.

He said DOE sent a letter to NRC in July 2004 to say that it would not provide supplemental responses to those KTI agreements that NRC did not close by the end of August 2004. In a September 2004 response to DOE's letter, the staff told DOE it expects the issue resolution process, including the KTI agreement information exchanges, to continue as pre-licensing activities until the LA is submitted. When DOE files an LA, the pre-licensing phase, along with the KTI agreement resolution process, will end, and the KTIs and the related agreements will no longer be the focus of NRC staff attention. From then on, NRC will evaluate whether the application adequately addresses NRC regulations. Consequently, the requirements in 10 CFR Part 63, not the KTI process, will provide the basis for a licensing determination. He said it will be up to DOE to decide how, or whether, to respond to the staff's feedback. The NRC will make its final determination on any issues relevant to licensing during review of the LA.

Mr. Reamer provided an update with regards to the status of the revised Integrated Issue Resolution Status Report (IIRSR). The staff began drafting sections of the IIRSR in December 2003. He stated that although the staff's initial target date was to publish a revision to the IIRSR by the end of September 2004, the staff was on track to distribute the report to DOE and stakeholders by the end of November as Revision 1 to NUREG-1762.

Mr. Reamer noted that since December 2003, DOE and NRC staff have held three technical exchanges to discuss the level of detail in the LA with respect to the design of surface and subsurface facilities. Specifically, in an October 2004 letter to DOE, the staff conveyed the NRC's expectations about the type and amount of information that DOE should provide on the design of subsurface and surface facilities to enable the staff to perform its technical review in accordance with 10 CFR Part 63 and the Yucca Mountain Review Plan (YMRP). The letter explained the agency's expectations on level of the detail in four areas: (1) the design of the site-specific cask to be used at the aging facility, (2) unresolved design issues regarding the important-to-safety (ITS) portion of the Geologic Repository Operation Area (GROA) electrical distribution system, (3) reliability values for equipment and systems, and (4) effects of preclosure operations on postclosure performance objectives.

Mr. Reamer said the NRC Yucca Mountain Inspection Program team (composed of Region IV, quality assurance (QA), Office of Enforcement, and onsite inspection staff) completed the revision to Manual Chapter (MC) 2300, "Yucca Mountain Inspection Program License Application Review." He noted that MC 2300 was revised to include risk information and to establish a phased inspection approach.

Mr. Reamer gave an update on the transition of the NRC onsite representatives to the NRC Region IV office. He indicated that NRC has slightly modified the structure of the Las Vegas office to focus on reviewing the potential LA and has moved some site office management functions to the region. Specifically, beginning FY 2005, one senior onsite representative will continue to report to HQ and the other senior onsite representative and the office assistant will be transferred to Region IV. In addition to performing activities in direct support of the licensing action, Region IV will also manage allegation followup and enforcement issues, if such issues arise, when DOE submits its application.

Mr. Reamer concluded by noting that the Advisory Committee on Nuclear Waste (ACNW) reported its working group's evaluation of igneous activities and their consequences in a November 3, 2004 letter to the NRC Chairman. The NRC staff is evaluating the working group's comments and will respond to the ACNW letter.

DOE Program Update

Dr. Margaret Chu, Director of DOE's Office of Civilian Radioactive Waste Management, began her remarks by discussing recent significant events affecting the YM program. She said a draft LA was completed on July 26, 2004. The DOE reviewed that version of the LA and another revision was completed on November 5, 2004. That revision is currently undergoing DOE review. The DOE is also evaluating the impact of significant events, including the U.S. Court of Appeals' decision on the EPA radiation protection standard, and DOE certification of availability of documents relevant to the licensing of the repository through the Licensing Support Network (LSN). As a result, DOE is revising the goal to submit the LA to the NRC in December of 2004. DOE will provide a revised schedule to the NRC as soon as it is available.

Dr. Chu reported that funding for the Office of Civilian Radioactive Waste Management would be flat for Fiscal Year 2005 at \$577 million. She said that historical funding levels would no longer be sufficient to implement the national policy for a licensed geologic repository.

Mr. Reamer (NRC) asked Dr. Chu to clarify DOE's current goal for submitting the LA to the NRC. Dr. Chu said that the DOE will not submit the LA in December of 2004, but the delay will not be significant.

Mr. John Linehan (NRC) asked about the schedule for recertification of the LSN. Dr. Chu said that this is planned for the spring of 2005.

DOE Yucca Mountain Project Update

John Arthur, Deputy Director, Office of Repository Development gave an update on the Yucca Mountain Project (YMP). Mr. Arthur said the purpose of his remarks was to summarize DOE's continuing improvements and accomplishments since the August 19, 2004, management meeting and to discuss the status of DOE preparations to submit the LA and complete the supporting documentation.

Mr. Arthur began by discussing the LSN activities. He noted that the Atomic Safety and Licensing Board (ASLB) granted a motion on August 31, 2004, to strike DOE's LSN certification. During the following 2 months, DOE closely examined DOE's internal processes

and the complete text of the ASLB decision. Since then, new internal requirements have been established, the budget has been realigned, and DOE is proceeding with additional work. DOE expects to recertify the LSN in the spring of 2005 timeframe.

Mr. Arthur noted that DOE would not submit the LA in 2004. In September 2004 DOE and Bechtel SAIC Company (BSC) completed a major management review of the draft LA. This review indicated that the science and design work completed in support of the LA was technically sound, was adequate for its intended purpose, and meets quality assurance requirements. This work supports robust safety analyses for the preclosure (operational) period through 10,000 years after permanent closure and was thoroughly cross-referenced against the requirements in 10 CFR Part 63 and the guidance in the YMRP.

Mr. Arthur said that DOE needs to refine the presentation of this technical work for licensing. Also, DOE needs to assure the transparency, traceability, and the self-sufficiency of the LA; and if necessary, clarify the presentation of technical, analytical, and compliance information; improve the readability of the document; provide more details, particularly in distinguishing structures, systems, and components that are important to safety or important to waste isolation; verify document-to-document consistency between the LA and underlying technical documents that were in revision during the development of the draft LA (principally Analysis and Modeling Reports, System Description Documents, Facility Description Documents, and the Preclosure Safety Analysis); and document some additional preclosure and design detail, consistent with discussions between DOE and NRC in the September 2004 technical exchange and based in part on DOE internal design reviews (in particular, important-to-safety Electrical Systems and the Aging Facility.)

Following the September management review, DOE and BSC produced an interim consolidated draft LA. This will form the basis for the final application. By the next NRC/DOE quarterly management meeting, DOE expects to discuss detailed plans and present a revised estimate for completing and submitting the LA to the NRC.

With respect to key technical issues, Mr. Arthur stated that on August 31, 2004, DOE submitted the remaining 17 of the 293 agreement item responses to the NRC. With this submission of information, the intended purpose of the KTI process has been met and the process completed for DOE. The KTI process has served an important role in facilitating resolution of many of the NRC staff's questions and concerns. Although the NRC has not yet evaluated and closed all of the agreements, DOE expects that any additional NRC staff questions or concerns regarding these agreement topics will be addressed during the licensing process.

With respect to Analysis and Model Reports (AMRs) supporting the LA, Mr. Arthur said that Phase II of the Regulatory Integration Team's (RIT) phase activities were almost complete. DOE has reviewed and is revising the AMRs to assure that they are suitable for the intended technical and regulatory audiences. To date, 87 of the 89 AMRs have been approved. The remaining two documents are scheduled for completion in November 2004. Quality metrics and quality assurance oversight indicate that this process has been effective based on the number of insignificant issues and unresolved items found during checking. Overall Mr. Arthur noted that the intent of DOE letter of May 28, 2004, to the NRC was being achieved.

Mr. Arthur then reported that for preclosure analyses, a Preclosure Design Integration Team was initiated to ensure that the preclosure safety basis is well defined, understandable,

complete, and reflected in an integrated manner in the documentation supporting the LA. Team activities include reviewing the current set of System Description Documents (SDDs), Facility Description Documents (FDDs), Preclosure Safety Analysis (PCSA) calculations, and other design calculations, as needed. This review will identify inconsistencies and discrepancies in these documents, as well as between these documents and the related LA sections. The reviews will focus on items and supporting documentation that are important to safety. The team will work with the authors of these documents to identify proposed changes that resolve the inconsistencies and discrepancies found during the reviews, and to ensure that the documents are completed or revised.

In the area of human performance, Mr. Arthur said that a condition report (CR) was initiated last spring in recognition of the impact of human performance on DOE quality products. DOE has developed a 2-year management plan describing the strategies, objectives, and goals for developing an "error-prevention mindset" by 2006.

After an introduction from Mr. Arthur, Peggy McCullough, BSC Deputy General Manager, discussed human performance, the status of CR-3235, and trends. She noted that BSC has completed a management directive that defines the direction and expectations for human performance. A 2-year management plan has been developed describing the strategies, objectives, and goals for developing an error prevention mind set by 2006. BSC integrated the human performance issues in the Quality Assurance Management Assessment report (QAMA) and Integrated Safety Management (ISM) Internal Assessment and formalized the activities to align with the Office of Repository Development (ORD) transition plan.

Ms. McCullough stated that an ORD/BSC Steering Committee oversees a human performance team that is charged with implementing the actions necessary to meet the goals. The primary focus since July 2004 has been to develop the basic human performance principles and practices. The objective to improve the self-reporting culture by January 2005 has achieved some notable success, primarily due to management focus on the BSC self-assessment program. Current metrics show significant improvement since April 2004.

She said that a self-assessment completed in July 2004 included an evaluation of the effectiveness of the human performance tools introduced in response to CR-1497 and adequacy of the changes implemented by management. The results indicated an improvement in performance as a result of implementing pre-job briefs, self-checking, checklists, and showed continuing usage of these tools. The recent trend report and the subsequent analysis suggest the human performance problems are in the skill-based area. The number of cross-cutting issues suggest a need to do a more thorough review of the causes of human performance problem to look for systemic or underlying issues.

With regards to CR-3235, a DOE/BSC management review of a draft root cause analysis revealed several deficiencies: no linkage between the data presented in the body of the report and the conclusions reached in the root cause summary; an erroneous conclusion that the closed CRs on Design & Engineering and the Preclosure Safety Analysis documents constituted a statistically significant trend; and failure to do an extent-of-condition review to

determine if a condition adverse to quality currently exists in the documentation. In an effort to improve the quality of this root cause analysis, BSC took the following steps:

- (1) Brought in a corporate team to do an extent-of-condition of a statistically significant sample of calculations and system description documents.
- (2) Gave the root cause evaluation team additional resources.
- 3) Clarified the root cause team charter to remove the presumption of the condition and its cause, and reinforced that the timeframe identified for the root cause report is a target.
- 4) Established a management oversight board to assist the root cause evaluation team.

Ms. McCullough said a number of metrics and trends showed positive results for current performance:

- Self-identification of CRs has remained above 90 percent for the past 7 months, with September 2004 at 95%.
- Average time to complete Level B and C conditions-adverse-to-quality (CAQs) is on a general downward trend, with the past 3 months averaging just above 60 days.
- As the CRs tied to RIT close at the end of November and early December 2004, BSC expects the statistics to be negatively impacted due to the lengthy time for completion of some AMRs.

The time differential between the scheduled closure date and the actual closure date of Level A and B CRs has ranged between an average 10 days early to an average 3 days late over the past 5 months. This is a particularly important statistic because although BSC measures itself against a static goal, BSC expects the staff to identify an appropriate schedule for completing corrective actions, and then to work to that schedule. BSC has consistently met its goal for closing CRs. For example, successful QA verification of Level A and B CRs was 96% for the month of October and has remained at 95% or better for the past 9 months.

With respect to Level C CRs, Ms. McCullough noted that BSC recently made a change to the corrective action program (CAP) to assign complete responsibility for closure of level CRs to the line organization. These issues are lower significance conditions, such as typos, omissions of initials, signatures or designators, and one-time minor procedural non-compliance. To gauge the line organizations' performance in assuming full responsibility for these CRs, each of the line organizations performed several self-assessments and an assessment of another organization's processing of these types of CRs. The majority of the assessments have been performed. During the past several weeks, the line managers have provided their analyses of these assessments.

When organizations found issues in reviewing their processing of these CRs, they initiated CRs documenting the issues. Independent of the line self-assessments, BSC requested that QA perform a 100% review of these CRs after closure and provide a scorecard on the performance of the line organizations. Some individual line organizations received unsatisfactory scores; however, the low scores tended to be on a very small number of CRs (only one in several cases). The responsible line managers have been directed to mentor the individuals involved in the processing of those CRs.

Mr. Arthur continued noting that with more than a year's worth experience in trying to meet the 30- and 100-day goals, the leadership council recently reviewed the data on the Level A CRs to see if these goals should be changed. The data showed an average of 53 days for an approved action plan, an average of 615 days for closure on closed CRs, and an average of 412 days for CRs currently open.

Mr. Arthur said DOE does not see these timeframes changing substantially at this point in the program because the Level A CRs have dealt with and will likely continue to deal primarily with complex intellectual processes. To date, all Level A CRs have required multiple actions and the products have been significantly delayed beyond the goals. Therefore, DOE believes it is better to define the appropriate timeframe for closing a CR and to work to the schedule that is identified for that CR, rather than to an arbitrary timeframe. Therefore, the project is eliminating the arbitrary 30- and 100-day goals and will set a root cause target completion date. BSC will establish due dates for actions based on their nature and significance and the project schedule and will hold organizations accountable for the due dates they have established.

Regarding Safety-Conscious Work Environment, Mr. Arthur said that ORD completed a project-wide survey in October 2004 with a 65% total response rate. DOE expects to have the final results tabulated and analyzed early in 2005 and hopes to share these results with NRC at the next quarterly management meeting. The annual Quality Assurance Management Assessment was completed on September 30, 2004, by D.L. English Consulting. This assessment was performed on the basis of Rev 14 of the Quality Assurance Requirements and Description (QARD). DOE has forwarded a copy of the report to NRC. No compromising flaws were observed in the infrastructure and mechanics of the QA program.

Mr. Arthur said DOE would appreciate any NRC feedback on KTI agreements that NRC staff categorized as high-significance as soon as possible. This will facilitate any necessary DOE actions as it proceeds toward the licensing process. As DOE continues preparations for submittal of the LA, DOE welcomes a continuing dialogue through technical exchanges and Appendix 7 meetings on subjects of interest to both NRC and DOE. DOE expects to have a revised LA schedule by the next NRC/DOE quarterly management meeting.

Mr. Reamer (NRC) asked if DOE would notify NRC of any scheduling decisions in writing if decisions are made before the next management meeting. DOE agreed to send a letter, if appropriate. Mr. Marty Virgilio (NRC) noted that DOE has not yet responded to the recent NRC letter on the level of design detail. Mr. Joseph Ziegler, Director, Office of License Application and Strategy, (DOE), noted that a response was not planned. DOE's current approach to level of design detail addresses the NRC concerns documented in the letter. Mr. Virgilio noted that it would be useful for NRC and DOE to have additional dialogue on the level of design detail before DOE completes its ongoing management review of the draft LA. Mr. Elmo Collins (NRC) asked if the current budget will impact design activities. Mr. Arthur said that DOE is trying to maintain the focus on design by cutting back in other areas such as long-term procurement. Mr. Reamer (NRC) said that he did not have the same level of confidence in the preclosure design integration activity as he did in the KTI response effort and the Regulatory Integration Team activities and it is not clear that DOE understands NRC expectations. With the new DOE schedule, there is an opportunity to clarify these issues. Mr. Ziegler (DOE) suggested that NRC and DOE could address preclosure design issues in a future meeting.

License Application Update

Mr. Ziegler, Director, Office of License Application and Strategy, reported on the progress being made towards LA, including the status of the Regulatory Integration Team activities, the Preclosure Design Integration Team activities, management review of the LA, and KTI agreements. Mr. Ziegler provided a comparison of percentage completion for actions related to the LA from July 2004 to October 2004.

Regarding the Regulatory Integration Team (RIT), Mr. Ziegler noted that Phase I (reviews) was complete and Phase II (document revision and approval) was almost complete. Eighty-seven of the 89 AMRs that support the LA have been completed as of November 22, 2004. The remaining two are scheduled for approval by the end of November 2004. Quality metrics indicate that the RIT process has been effective.

Mr. Ziegler also noted that a Preclosure Design Integration Team (P/DIT) has been formed to ensure the preclosure safety basis is well defined, complete, and integrated in the LA support documentation. Fifty design and preclosure safety analysis documents are being reviewed and revised as appropriate. This activity is scheduled to be completed in December of 2004.

Mr. Ziegler provided a status of the management review of the LA. A joint DOE/BSC review of completeness of the LA was conducted during September 2004. The review indicated that transparency and traceability needed to be improved in some cases. The LA was revised and is under review in DOE.

Mr. Ziegler said that DOE had submitted responses to all 293 KTI agreements as of August 31, 2004. Of the 293 agreements, NRC considers 124 complete as of November 15, 2004. Mr. Ziegler said that a continuing dialogue between DOE and NRC technical staff might facilitate the NRC reviews.

Next, Mr. Ziegler discussed the September 2004 DOE/NRC technical exchange on Yucca Mountain surface and subsurface facilities, acknowledging the October 8, 2004, NRC letter reiterating NRC's expectations on content requirements for the LA.

In closing, Mr. Ziegler noted that the RIT activities are nearly complete, substantial progress has been made on the PDIT, a comprehensive management review of the LA has been completed, and data qualification, software verification, and model validation are essentially complete.

Mr. Strosnider (NRC) asked what criteria were used for the management review. Mr. Ziegler said that the YMRP criteria were used.

Mr. Reamer (NRC) asked if the 89 AMRs from RIT would be put on DOE website. Mr. Ziegler said that they would be put on the web or transmitted to NRC under a cover letter. He also said that DOE would send a list of the 89 AMRs to the NRC.

Transportation Cask Systems Acquisition

Gary Lanthrum, Director, Office of National Transportation, summarized the DOE approach to

acquiring cask systems, and efforts to ensure compatibility of casks with Yucca Mountain surface facilities and with shipping sites. He also discussed the capability of commercially available casks to accommodate commercial and DOE spent fuel.

Mr. Lanthrum said that DOE is focused on using existing cask designs and Certificates of Compliance when possible. DOE also has a preference for cask systems that provide maximum flexibility. Final decisions have not been made on the suite of casks required for both transportation and an aging facility.

DOE has purchased cask capability assessments from vendors possessing NRC Certificates of Compliance. Analysis of vendor data indicated that existing casks and Certificates of Compliance could accommodate about 60% of the fuel available for shipment in 2010. Preliminary analysis by the vendors indicated that Certificates of Compliance could be modified to accommodate more than 90% of the commercial spent nuclear fuel inventory, based on characteristics of spent nuclear fuel alone.

Mr. Lanthrum said that existing casks are technically capable of transporting DOE waste. New internal baskets could be developed to accommodate the DOE canisters. DOE fuel will only be shipped in canisters during the first 5 years of repository operations. Finally, DOE will continue efforts to integrate planning to reduce the number of new casks for NRC review and certification. Mr. Lanthrum also noted that some of the utilities did not have the infrastructure to accommodate large rail transportation and that less than 30 percent of the inventory is compatible with current rail casks' Certificates of Compliance.

Mr. Reamer (NRC) asked about the path forward for facility infrastructure. Mr. Lanthrum said that any plans for changes to the utilities infrastructures would be driven by utilities' needs, and would have to come from the utilities themselves.

Mr. Robert Lewis (NRC) asked about the use of nonstandard casks, such as those that may be used by the Private Fuel Storage Project. Mr. Lanthrum said that this is a waste acceptance and contractual issue and not a transportation issue.

Quality Assurance Program Update

Mr. Dennis Brown, Director, Office of Quality Assurance (OQA), provided an update on QA activities. Mr. Brown's presentation topics included the status of the Quality Assurance Requirements and Description (QARD), the corrective action program oversight, audits and surveillance, environmental management (EM) activities, Naval Nuclear Propulsion Program (NNPP) oversight, and trend evaluation and reporting.

Regarding the QARD, Mr. Brown summarized topics discussed during the September 2004 quarterly QA meeting with the NRC, including waste custodian interfaces, Part 21 commercial grade item dedication, records retention, supplier QA records, and ISO procurement.

Regarding the corrective action program (CAP), Mr. Brown reported that BSC QA is reviewing 100% of BSC Level C corrective actions and OQA is reviewing 100% of the DOE Level C corrective actions. OQA is observing selected BSC QA oversight activities. OQA completed surveillances of software quality assurance and AMR review and approval. In both cases,

procedures were effectively implemented and no conditions adverse to quality were identified. OQA has three audits planned through March of 2005, including preclosure safety analysis; qualification, indoctrination, training; and BSC Las Vegas activities.

BSC completed one audit on AMR documentation and several surveillances on data confirmation, model validation, waste package specifications, verification of education and experience, design and engineering processes, and effectiveness of CR-1720 corrective actions.

One limited-scope audit of EM activities was performed at Savannah River. The audit results indicated that the Savannah River high-level waste QA Program is effectively implemented. A desktop audit of the Office of River Protection high-level waste is in progress and an audit of the National Spent Nuclear Fuel Program in Idaho is planned for February of 2005.

OQA completed an annual program review of the NNPP and found that the NNPP QA Program was acceptable. Four observations were conducted during the fiscal year and no significant QA issues were identified. OQA is developing a new procedure that will formalize the OQA process for NNPP program oversight.

With respect to trend and evaluation reporting, more CRs are being self-identified. More than 80% of the CRs are Level C. The dominant causal factor is human performance (55%). Six procedures are causing 60% of the problems. An emerging issue has been identified related to change management and supervisory methods.

In closing, Mr. Brown discussed an organizational change in OQA to streamline the organization. Fred Brown (NRC) asked if OQA had identified any issues with model validation in the AMRs that OQA is reviewing to close the model validation CR. Mr. Brown reported that there may be issues in two of these documents.

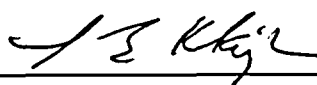
Mr. Reamer (NRC) asked about OQA interactions with the Preclosure Design Review Team. Mr. Brown noted that there is a full-time quality assurance engineer monitoring these activities. OQA is evaluating the need to conduct audit or surveillances of this activity later in the process.

Action Items Status

The status of open action items was discussed. Five new action items were established. DOE and NRC agreed to close two previous action items, MM 0304-07 and MM 0403-03. The status of the action items is summarized in the attached table.


Public Comments

Ms. Michele Boyd representing Public Citizen said that absent an EPA standard, DOE could not submit a high-quality LA. She said that the issues of igneous activity and corrosion need to be resolved before an LA can be submitted.

 Date: 12/2/04

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