

WM DOCKET CONTROL  
CENTER

August 20, 1985

'85 SEP -9 P4:19

Subject: Minutes of Quality Assurance Coordinating Group (QACG) Meeting of  
July 30-August 1, 1985

To: Sally Mann, CRPO  
Jeff Neff, SRPO  
Lee Olson, BWIP  
Don Vieth, NNWSI

Attached for your information are the minutes of QACG Meeting that was held in Columbus, Ohio on July 30-August 1, 1985. Please contact me at FTS 252-1248 if you have any questions, comments or additions you feel should be made.

attachment

CARL NEWTON

*[Signature]*

cc. w/attachment

E. Sulek, Weston  
C. Williams, BPMD (ONWI)  
M. Nicol, RHO  
J. Reese, SRPO  
E. Patzer, BPMD (SRP)  
D. Lozier, BPMD (CRP)  
M. Flanningan, DOE/CH  
J. Blaylock, WMPO-NV  
S. Klein, SAIC  
E. Langston, HQ/OCRWM, RW-43  
P. Saget, BWIP-RL  
B. Kehew, CPO-CH  
H. Steinberg, RW-33  
C. Head, RW-23  
R. Stein, RW-23  
D. Hedges, NRC

WM Record File  
405

WM Project 1  
Docket No. \_\_\_\_\_  
PDR ☒  
LPDR \_\_\_\_\_

Distribution:

Hedges HJM Dellagatti  
Kehewy DEM Belhorn  
(Return to WM, 623 SS)

*[Signature]*

8509300042 850820  
PDR WASTE  
WM-1 PDR

Quality Assurance Coordinating Group  
Meeting Held At

Battelle Project Management Division  
505 King Avenue  
Columbus, Ohio

July 30 - August 1, 1985

Participants

Pierre Saget

John Clark

Mike Nicol

John Rinaldi

Jim Blaylock

Stan Klein

Mike Flannigan

Bud Kehew

Don Lozier

Jerry Reese

Buck Patzer

Clarence Williams

Gene Langston

Hal Steinberg

Carl Newton

Ed Sulek

BWIP

BWIP

Rockwell/BWIP

DOE-NV

DOE-NNWSI

SAIC/QASC

DOE-CH

DOE-CPO-CH

BPMD/CRP

SRPO

BPMD/SRP

BPMD

DOE-OCRWM

DOE-OCRWM-OSTS

DOE-OCRWM-OGR, Chairman

Weston, Secretary

Summary  
QACG Meeting  
Columbus, Ohio  
July 30 - August 1, 1985

The participants included representatives from OGR Headquarters, the four project offices and principal contractors. The OCRWM and OSTs QA Managers also attended.

1) The status of development of Q-List methodology was discussed, list of the DOE/NRC actions identified, and a schedule for the required actions provided. Several participants expressed concern that the projects were not given sufficient time to review the proposed methodology prior to its submittal to the NRC and that their comments were not properly dispositioned.

2) The ten concerns identified by the NRC during their site visits along with DOE's proposed responses to the concerns were discussed; principally the one dealing with the independence of DOE's QA organization. The OCRWM QA Manager advised that the NRC position on this matter is being prepared and should be sent by the NRC to DOE/HQ in six to eight weeks. The projects felt that past DOE/NRC interactions on QA have been inadequate and that regular and more frequent DOE/NRC interactions are required in the future to obtain prompt resolutions of issues as they arise. The group requested the Chairman to initiate regular and frequent interactions.

3) The threshold point for the application of 10CFR Part 21 was again questioned by the projects and an official interpretation from DOE-OGC was requested.

4) Headquarters presented a report on the results of their QA audits of the project offices. The project representatives agreed that a copy of future reports of HQ audits will go to all projects for information, not just to the audited project.

5) The OCRWM QA Manager made a presentation on the purpose, scope and content of the Quality Management Policies and Requirements Document and advised the group that it is expected to be signed by the Director in August and officially issued as Program Wide QA Requirements in September.

6) SCP preparation was discussed by the projects and no problems were foreseen in the preparation or review of the SCP's by the projects. However, the checklist proposed to be used by Headquarters during HQ review was questioned by Nevada. It was resolved that the "Annotated Outline for the Site Characterization Plans" would be used as the governing document during HQ review and the HQ proposed checklist would be reviewed to assure that it does not introduce new and conflicting requirements.

7) The projects provided a briefing on the status of development and implementation of their QA programs along with proposed staffing levels. Details are provided in the meeting minutes.

8) A proposed approach to applying graded QA to OGR items and activities was discussed. It was agreed that Weston's draft methodology for graded QA would include the following principles:

- 1) There should be only two quality classes, Q-List and non Q-List.
- 2) Graded QA would be applied to Q-List as well as to non Q-List items.
- 3) Four grades of QA will be applied.
- 4) The Canadian (Z-299) approach would be modified and adapted for OGR application.

9) It was decided that future QACG meetings would be held at central locations. The next two will be held in Denver and Albuquerque respectively.

10) A workshop was held for the review and comment on proposed HQ-OGR supplementary QA requirements for features of the QA program which are not adequately covered in existing standards and federal regulations. The proposed requirements were reviewed and comments were discussed with the respective authors. Revisions are to be made by Headquarters to incorporate the comments. The revised version of each supplementary requirement will then be sent to the baseline change control board (consisting of the Associate Director, OGR and the Project Managers) for their official approval and issue as part of the baselined HQ-OGR QA plan.

OACG Meeting Minutes  
July 30 through August 1, 1985

Copies of the agenda (Attachment #1) were distributed to the attendees.

The Chairman, Carl Newton, could not attend on July 30 due to other commitments. The meeting was chaired by the Secretary. The Chairman will be present at the July 31 and August 1 sessions.

Agenda Item 1, Opening Remarks

The Chairman's opening remarks covered the following topics:

o Status of Q-List Methodology

At a DOE/NRC meeting on July 1, 1985 the draft Q-List methodology was discussed and the following 10 action items were identified: (Attachment #2)

- DOE to provide a general list of activities which will fall under their Appendix B QA Program
- DOE will furnish to NRC rationale showing that the methodology is conservative and appropriate
- DOE to propose for consideration a low probability cut off limit
- NRC staff to investigate other rationale for developing a low probability cut-off limit
- DOE will eliminate reference to safety classes 1 and 2 in the methodology paper
- DOE will develop a provisional Q-List for consultation with the NRC staff prior to submittal of the SCP.
- DOE will provide more detail on the approach for reviewing retrievability for possible Q-List items
- NRC agreed to provide DOE with additional information on the definition of "Important to Waste Isolation"
- DOE agreed, in the Q-List methodology document, to provide for resolution of any discrepancies between definitions in the DOE GRD document and regulations
- NRC and DOE agreed on additional discussions on graded QA

A schedule for the actions are summarized as follows:

8/15/85	Q-List, revised Q-List methodology, proposed graded QA methodology from Weston to HQ
8/20/85	Above to Projects for comment
9/10/85	Project comments to HQ
9/20/85	HQ incorporate comments and furnish revised methodology to NRC

During discussions the Projects expressed concerns that HQ is not always providing adequate time for Project to comment on various issues and that Project comments are not always properly dispositioned by Headquarters.

o Status of DOE QA Handbook for Geologic Investigations

- The QACG Chairman has informally discussed the handbook with Jim Kennedy of NRC who had no official comment on the document but indicated that DOE should issue it as a QA requirements document
- Chairman will send a camera ready copy of the handbook, through HQ concurrence channels, to the printer by September 30
- HQ distribution of the handbook as a tutorial document (not requirements) is expected by October 31

o DOE/NRC Resolution of "QA Independence" Issue

During their visit to each of the first repository projects in December 1984, the NRC identified 10 possible areas for improvement of DOE's QA Programs. The NRC's concern of DOE's emphasis on the line organization's responsibilities for QA and its impact on the NRC required independent QA organization as well as DOE's proposed response to this concern is presented on page 4 of Attachment #3. The proposed DOE positions on all issues are scheduled for discussion at the next Project Manager's meeting and the positions modified to incorporate all agreed upon changes. The revised version will be sent to the NRC in August followed by discussions at a DOE/NRC meeting in September.

During additional discussions, Gene Langston advised the QACG that NRC, Dale Hedges, is preparing a "White Paper" on QA organizational independence which will take a "strong position" on the issue. The NRC position paper is expected to be sent to HQ within 6 weeks.

Most of the Projects expressed a concern that many issues have been identified and questions raised by them with no NRC response or, where NRC response was forthcoming, it was late. They requested that the QACG Chairman provide effective channels for regular DOE interactions with the NRC so that prompt resolution of issues and responses to questions can be obtained.



It was suggested that one way of providing DOE/NRC interaction on QA matters would be to have NRC attend the QACG meetings. After considerable discussion, it was decided that NRC should not attend the working sessions of the group but that interaction should be through other means with both headquarters and project participation.

o Status for the QA Program at HQ

A report on the status of HQ QA activities was distributed (Attachment #4). It provides status and schedules for the following planned and completed HQ QA actions.

- Update HQ-OGR QA Plan (OGR-B/3)
- Issue HQ quality implementing procedures
- Initiate OGR QA indoctrination and training program
- Conduct internal OGR QA audits
- Summary of results of HQ OGR QA audits of first repository projects
- Selected participation by HQ in project QA audits of major contractors
- Analysis of project audit reports
- Issue of OGR Program-wide QA policy guidance
- Resolution of NRC QA concerns
- Provide SCP input
- Conduct QACG meetings

Agenda Item 2, Threshold Point for the Application of 10 CFR 21

Jerry Reese of SRPO requested that this item be included in the agenda because of a recent experience with one of his contractors. The NRC memo Davis to Cunningham, 6/20/84 and Cunningham to Davis 7/24/84 (Attachment #5) were discussed. In Cunningham's summary, he states that the view of the NRC's Office of the Executive Legal Director is: "That Part 21 has little, if any, applicability to near-term repository activities of DOE, its contractors, or subcontractors, but that its objectives might be achieved pursuant to the Quality Assurance principles of Part 60." The projects were advised to be guided accordingly. It was requested that the QACG Chairman obtain DOE's position on 10CFR21 Threshold Point from the Office of General Counsel.

Agenda Item 3, Action Items

A report was presented by the Secretary on the action items from the last meeting. All action items have been completed except as noted below.

- Projects and prime/integrating support contractors were to send controlled copies of their QA plans and procedures to all other project and contractors. WMPO, SAI and BPMD had made transmittals to other projects/contractors the week of July 22. BWIP procedures are under preparation and SRPO QA plan and procedures are undergoing a major rewrite. Copies of these will be provided by BWIP and SRPO to other projects/contractors when available. Projects/contractors are to deal directly with each other in arranging for their inclusion on controlled distribution lists.
- The QA requirements for qualification and certification of personnel has been revised to incorporate QACG comments and is being sent out for Project Manager's review and concurrence through established baseline document change procedures. The requirement when approved will be issued as a change to the HQ-OGR QA Plan, OGR/B-3.
- BWIP was to provide members with Rockwell's procedures on readiness reviews and copies of DOE Directive RL-5481.1. John Clark distributed copies of RL 5481.1 and Rockwell's procedure RHO-MA-150 dated 4/26/85 (Attachment #6).

BWIP also agreed to make a presentation on readiness reviews at the next QACG meeting in October. Two to three hours will be set aside for this presentation which will include discussions on the extent of NRC involvement in BWIP readiness reviews.

- The secretary was to investigate possible central location for future QACG meetings. This report was prepared and will be presented tomorrow morning during discussions on Agenda Item 9.
- The remaining open action items dealt with review and comment on 8 specific areas of supplementary QA requirements being proposed for OGR Program-wide application. When approved they will be issued as changes to the HQ-OGR QA plan through baseline procedures. These open action items will be completed at workshop sessions scheduled for the next two days.

#### Agenda Item 4, Report on HQ QA Audits of the Project Offices

The results of HQ-OGR QA audits of NNWSI, BWIP and SRPO were summarized and presented by the Chairman. Details of the audits are contained in pages 2-5 of Attachment #4. It was decided that for future HQ audits of each Project Office, copies of the audit reports will be distributed to all projects for information.

Gene Langston suggested that all audit reports should open with a brief Executive Summary to cover all conclusions, not only deficiencies, but acceptable and exemplary practices as well.

Discussion followed concerning the MAC position of "Auditing for Effectiveness." SRPO has agreed to make a presentation at the next QACG meeting on the course, "Auditing for Effectiveness" conducted by MAC and attended by F. Hood, BPMD QA manager.



Agenda Item 5, Status of the Quality Management Policies and Requirements (QMPR) Document

Gene Langston made a presentation on the purpose, objectives and content of the OCRWM Quality Management Policies and Requirements Document (QMPR). The QMPR will establish OCRWM program-wide quality policies and requirements. Gene has received OGR and OSTS comments and expects to have the document ready for Ben Rusche's signature in mid August. Printing and official issue is expected in September.

Agenda Item 6, Report by the Projects on SCP Preparation

The three first repository projects provided brief presentations on the status of preparation of the QA Section (8.6) of their respective SCPs. The major problem centered around the use of a draft check list developed at HQ to assist HQ in their review of SCP Section 8.6. Nevada representatives expressed concern that the check list imposes requirements beyond those specified in the SCP annotated outline. The Chairman pointed out that the checklist did not intend to impose additional requirements but serves only to provide more detail than is contained in the annotated outline. Concerns also were expressed by NNWSI that the checklist would change the location of specific information within Section 8.6 from the location specified in the annotated outline. The Chairman advised that HQ review of Section 8.6 of each project's SCP would be based strictly on the annotated outline for location of information and on the annotated outline, applicable portions of the NRC review plan and HQ draft checklist for content and requirements.

A second question arose as to the level of detail required in describing the QA administrative and technical procedures in the SCP. SRPO and BWIP had apparently received conflicting verbal information from NRC on this matter. The consensus was that all projects would merely list procedure number and title. A synoptic description of each procedure would not be provided.

Agenda Item 7, Status of Project Office QA Programs

Each project presented a report on the status of QA program development and implementation.

- NNWSI are in process of reviewing the Project QA plan and QA program plan, NVO-196 -17 and 196-18, respectively. They are also in process of reviewing the QA Plans of major project participants. The QA plans of four major participants have been approved. Three others required major rewrites. It is anticipated that all participants programs will be approved by the end of December. The role of USGS has not been fully resolved. Discussions are ongoing at higher levels to obtain resolution. Plans are underway to enlarge and reactivate a surveillance plan over contractor/participant activities. Staffing level is to increase from 4 SAI people to 14 in support of the Project Office QA Program.
- BWIP has formed a task force of 4 people headed by Pierre Saget and supported by additional contractor people from MAC and PNL. The initial effort is focused on writing the required QA procedures by the end of FY 85. The task force is also responsible for personnel training.

BWIP will review and approve contractors' QA plans but do not intend to approve contractors' QA procedures. They also question the need for submitting the BWIP QA administrative procedures to HQ for approval as required by the HQ-OGR QA Plan.

BWIP QA planned staffing level for FY 1986 is 18-20 people. Of this number 7 or 8 will be DOE, remainder will be subcontract support.

- SRPO advised that their QA program is being totally overhauled. The first draft of the QA Plan will be ready for internal (SRP) review on August 30. Approximately 40 QA administrative procedures will be required to implement the plan. In the interim, SRPO will be implementing existing procedures. CER is providing technical support to SRPO in rewriting the QA program. Schedule for development of the QA program is slipping due to emphasis on EAs.

Staffing levels are expected to be 4 people in FY 1986 and 6 in FY 1987. Additional support is being provided to SRPO by CER.

- CRPO is also using the support services of CER. Plans and procedures are being developed for approval in the July 1986 timeframe. Staffing levels are expected to be 2 DOE plus 2 CER support for FY 1986.

#### Agenda Item 8, Proposed Methodology on Quality Levels for Non Q-List Items

The Secretary presented a proposed philosophy for applying graded QA to OGR items and activities (Attachment #7). After considerable discussion, it was decided that: 1) graded QA should be applied to Q-List as well as non Q-List items and activities; 2) there should be only Q-List and non Q-List quality classifications; 3) there should be four grades of QA applied; and 4) the Z-299, Canadian approach will be modified as required to adapt it for use in the OGR program.

Weston will develop a detailed proposed procedure for graded QA and submit it to HQ for transmittal to the projects by 8/15/85. After receipt of project comments the procedure will be revised to incorporate them and the revised version will be submitted to NRC.

The projects recommended that after DOE/NRC agreement is reached, the final graded QA approach be subject to an independent peer review.

#### Agenda Item 9, Presentation on Central Location for the Next QACG Meeting

At previous QACG meeting it was decided to hold future meetings at a central location rather than rotating among the project offices and headquarters as before.

Four cities were investigated as being potentially acceptable; these were Albuquerque, Denver, St. Louis, and Chicago. Information was presented on costs and accessibility (Attachment #8).

It was unanimously decided that the next meeting would be held October 22-24 in Denver and the following meeting January 28-30 in Albuquerque. Arrangements are to be made by the secretary.

BWIP suggested that the Residence Inn in Denver and in Albuquerque be considered as a potentially acceptable facility along with the others listed in Attachment #8. This suggestion was based on a recent satisfactory experience with the Residence Inn in Denver.

Several agenda items were identified for the next meeting:

- 1) Presentation on "Auditing for Effectiveness by Jerry Reese (SRPO)
- 2) Discussion on QA audits: pros and cons, format and content of audit reports, analysis of audit results by all members
- 3) Presentation on the readiness review process (construction pre-requisite plan) by Pierre Saget (BWIP)
- 4) Discussion on how to deal with definitions of NRC terms such as reproducibility, replicability and uncertainty of data to be led by Buck Patzer of BPMD/SRP
- 5) Workshop on QARD led by BWIP.

Agenda Item 10, Workshop on Proposed Supplementary QA Requirements For

Drafts of the following proposed, supplementary OGR QA requirements were distributed by the authors during the last meeting and dates for comments were scheduled.

<u>Proposed Requirement</u>	<u>Author</u>
1) Computer Software Control	Don Lozier
2) Control of Measuring and Test Equipment	Mike Nicol
3) QA Records	Clarence Williams
4) Reliability of Existing Data	Jim Blaylock
5) Peer Review	Mike Nicol
6) QA for Experiments	Jim Blaylock
7) Oversight of Field Activities	Ed Sulek
8) Significant Problem Reporting	Ed Sulek

When it became apparent to the Chairman that comments were not to be forthcoming, this workshop session was scheduled to review the proposed requirements, and discuss and resolve comments with each author.

At the conclusion of the workshop it was decided that Headquarters would take on the responsibility for revising proposed requirements 1 through 4, 6 and 7. Mike Nicol will revise requirement 5, peer review. Requirement 8, significant problem reporting, was adequately covered in the OCRWM, Quality Management Policies and Requirement Document and supplementary requirements are not needed.

The person responsible for making the revision is to telefax a draft of the completed revision to the author and obtain his concurrence. This will be followed by submitting a Baseline Document Change Proposal for each supplementary requirement and obtaining the official approval of the Associate Director, OGR and the four project managers who comprise the Baseline Change Control Board.

Agenda Item 11, Review and Identification of Open Item

- 1) Obtain DOE-OGC position on the threshold point for 10CFR21. C. Newton
- 2) Coordinate more effective interactions with NRC on QA matters. C. Newton
- 3) Draft a proposed approach to graded QA and submit to HQ for transmittal to projects for review. E. Sulek  
C. Newton
- 4) Transmit copies of BWIP BOARD to all members for comment followed by a workshop at the next meeting. R.P. Saget
- 5) Revise proposed OGR supplementary QA requirements, except peer review, discuss revised versions with the authors, submit revised proposed requirements to Baseline Change Control Board for approval. E. Sulek

- 6) Revise proposed OGR supplementary QA requirements  
for peer review, incorporating QACG comments,  
submit revised version to HQ for submittal to  
Baseline Change Control Board for approval.

M. Nicol

Agenda Item 12, Adjournment at 12:30 PM on 9/1

Agenda  
QACG Meeting  
July 30 - August 1, 1985  
Columbus, Ohio

QACG MEETING  
MINUTES  
E/30-9/1/85  
ATTACHMENT #1

July 30

- |   |             |             |
|---|-------------|-------------|
| 1. Opening Remarks  | Chairman    | 8:30-9:00   |
| <ul style="list-style-type: none"><li>o General Comments</li><li>o Status of Q-List Methodology</li><li>o Status of DOE QA Handbook</li><li>o DOE/NRC Resolution of QA Independence</li><li>o Status for QA Program at HQ</li></ul> |             |             |
| 2. Threshold Point for Application of 10 CFR 21   | C. Newton   | 9:00-9:30   |
|   | J. Reese    |             |
| 3. Review Action Items From Previous Meeting  | Secretary   | 9:30-10:00  |
| Break   |             | 10:00-10:15 |
| 4. Report on HQ QA Audits of P.O.'s   | Chairman    | 10:15-11:00 |
| 5. Status of QMPR Document  | E. Langston | 11:00-12:00 |
| Lunch   |             | 12:00-1:00  |
| 6. Report on SCP Preparation (QA Section)   | BWIP        | 1:00-2:00   |
|   | NNWSI       |             |
|   | SRPO        |             |
| 7. Status of Project Office QA Program  | Projects    | 2:00-3:30   |
| <ul style="list-style-type: none"><li>o Procedures</li><li>o Implementation</li></ul>   |             |             |
| Break   |             | 3:30-3:45   |
| 8. Proposed Methodology on<br>Quality Levels for Non Q-List Items.<br>Followed by Open Discussion   | Sulek       | 3:45-5:00   |

July 31

- |   |           |           |
|---|-----------|-----------|
| 9. Next QACG Meeting  | Secretary | 8:30-9:00 |
| <ul style="list-style-type: none"><li>o Presentation on Central Location<ul style="list-style-type: none"><li>- Accommodations</li><li>- Prices</li></ul></li><li>o Establish Location &amp; Dates</li><li>o Identify Proposed Agenda Items</li></ul> |           |           |
|   | All       | 9:00-9:30 |



July 31

10. Workshop on QA Program Requirements		9:30-5:30
(a) Computer Software Control	D. Lozier	9:30-10:45
Break		10:45-11:00
(b) Control of Measuring & Test Equipment	M. Nicol	11:00-12:00
Lunch		12:00-1:00
(c) QA Records	C. Williams	1:00-2:30
Break		2:30-2:45
(d) Reliability of Existing Data	J. Blaylock	2:45-4:00
(e) Peer Review	M. Nicol	4:00-5:30

August 1

10. Workshop on QA Requirements (Cont.)		8:30-5:00
(f) QA for R&D	J. Blaylock	8:30-10:00
Break		10:00-10:15
(g) Oversight of Field Activities	E. Sulek	10:15-11:30
Lunch		11:30-12:30
(h) Significant Problem Reporting	E. Sulek	12:30-2:00
11. Review and Recap	All	2:00-4:00
Identification of Action Items	All	4:00-5:00
12. Adjourn		

To: Ralph Stein  
Thru: Charles Head  
From: Carl Newton

*Carl Newton*  
*7-26-85*

*QACG MEETING  
MINUTES*

*8:30 - 9/1/85*

*ATTACHMENT #2*

In your note of July 16, 1985 you asked for an explanation of how the action items identified in the minutes of the July 1 Q-List Methodology meeting with NRC were to be accomplished. Ten action items were listed in the minutes; eight for DOE and two for NRC. The ten action items are repeated below along with the parties responsible for resolving them and the expected completion dates. The proposed schedules have been reviewed by Hank Bermanis and Ed Sulek and it appears the dates can be met.

1. Action:

. . . DOE will provide a generic list of activities which will fall under the Appendix B QA program.

Assigned to:

Carl Newton, DOE-HQ, Hank Bermanis and Terry Bates, Weston

Plan of Action and Schedule:

Hank Bermanis is going to work with Terry Bates on the existing, generic Q-List prepared by Weston and will furnish a listing to HQ by August 15, 1985. This listing will be accompanied by the rationale for how items on the Q-List were selected. The selection rationale will be based on preclosure and postclosure performance ~~assessments~~ and engineering judgment. Assumptions used in making the <sup>estimates</sup> estimates will be set forth.

Hank Bermanis will revise the Q-List Methodology paper and will submit it to HQ for review by August 15. The revised paper will include:

- a) The rationale for the methodology showing it is conservative and appropriate.
- b) A low-probability cut-off limit and the rationale for it.
- c) An elimination of the safety class 1 and 2 terminology.
- d) More detail on the approach for reviewing retrievability for possible Q-List items.
- e) Identification and resolution of any discrepancies between definitions in the DOE Generic Requirements Document, NRC regulations, and the Q-List Methodology document.

HQ will review the Weston draft Q-List and the revised Q-List Methodology paper and by August 20, 1985 will send them to the projects for their review and comment. Project comments are to be submitted to HQ by September 10 along with their preliminary site-specific Q-List. A meeting

between project representatives and HQ/Weston is to be held on September 10 to discuss and resolve Q-List questions.

Following this meeting Hank Bermanis and Carl Newton will work together in making any needed revisions to the Q-List Methodology paper and to the generic Q-List itself. By September 20 the revised paper and Q-List will be furnished to NRC for their review.

A meeting with NRC to discuss our methodology and Q-List and to receive any NRC comments will be scheduled for October 21, 1985.

2. Action:

. . . to furnish to NRC the rationale showing their methodology is conservative and appropriate.

Assigned To:

Carl Newton, HQ

Plan of Action and Schedule:

A revised methodology paper will be:

- a) prepared by Weston (August 15)
- b) reviewed by HQ and furnished to the projects (August 20),
- c) reviewed and commented on by the projects (September 10),
- d) revised again to incorporate any project comments (September 20), and
- e) furnished to NRC for their review (September 20).

3. Action:

. . . to propose for consideration a low probability cut-off limit.

Assigned To:

Carl Newton, HQ

Plan of Action and Schedule:

A revised methodology paper will be:

- a) prepared by Weston (August 15)
- b) reviewed by HQ and furnished to the projects (August 20),
- c) reviewed and commented on by the projects (September 10),
- d) revised again to incorporate any project comments (September 20), and
- e) furnished to NRC for their review (September 20).

4. Action:

The NRC staff agreed to investigate other rationales for developing a low cut-off probability limit.

Assigned To:

Dale Hedges, NRC

Plan of Action and Schedule:

This matter was discussed with Dale Hedges of NRC on July 24 who agreed to take action on it. Details to be provided later.

5. Action:

The DOE agreed to eliminate reference to Safety Classes 1 and 2 in the methodology paper.

Assigned To:

Hank Bermanis, Weston

Plan of Action and Schedule:

This will be done in the revision of the Q-List Methodology Paper by August 15. See action 1 above, item c.

6. Action:

The DOE indicated that they will develop a provisional "Q" list for consultation with NRC staff prior to submittal of the SCP. the schedule for this list is October, 1985.

Assigned To:

Carl Newton, DOE

Plan of Action and Schedule:

A meeting with NRC to discuss our methodology and Q-List and to receive any NRC comments will be scheduled for October 21, 1985.

The Q-List will be furnished to NRC on September 20, 1985.

7. Action:

DOE will provide more detail on the approach for reviewing retrievability for possible "Q" List items.

Assigned To:

Hank Bermanis, Weston

Plan of Action and Schedule:

More detail on the approach for reviewing retrievability for possible Q-List items.

The revised paper will be given to NRC by September 20, 1985.

8. Action:

NRC staff agreed to provide DOE additional information on the definition of "Important to waste isolation."

Assigned To:

Dale Hedges, NRC

Plan of Action and Schedule

Dale Hedges agreed on July 24 to take action on this matter. Details are to be provided later.

9. Action:

DOE agreed to specify in the "Q" list methodology document that any discrepancies between definitions in the DOE Generic Requirements Document (GRD) and the regulations would be resolved so that the basis for the "Q" list analysis will be well founded.

Assigned To:

Hank Bermanis, Weston

Plan of Action and Schedule:

Identification and resolution of any discrepancies between definitions in the DOE Generic Requirements Document, NRC regulations, and the Q-List Methodology document.

The revised paper will be given to NRC by September 20, 1985.

10. Action:

The NRC and DOE staffs agreed there should be additional discussion on grading QA within the "Q" list and assurance measures for non-"Q" list items which fall under NRC oversight.

Assigned To:

Carl Newton, DOE  
ED Sulek and Hank Bermanis, Weston

Plan of Action and Schedule

A paper proposing a DOE policy on graded QA:

- a) Is being prepared by Weston and will be available for HQ review by August 15, 1985.
- b) Will be reviewed by DOE-HQ by August 20, 1985 and furnished to the DOE projects for review.
- c) Will be commented on by the projects by September 10.
- d) Will be discussed at a meeting on September 10.
- e) Will be reviewed to incorporate any project comments and incorporated into the Q-List Methodology Paper by September 20.
- f) Will be furnished to NRC by September 20.



QACG MEETING  
MINUTES  
8/30 - 9/1/85  
ATTACHMENT # 3

DISCUSSION PAPER FOR PROJECT MANAGERS' MEETING  
PROPOSED RESPONSE TO NRC'S CONCERNS ABOUT DOE'S QUALITY ASSURANCE PROGRAM

Background

NRC visited each of the first repository projects during December 1984 to be briefed on each projects' QA programs. Following each meeting, NRC and the project being visited prepared meeting minutes. In these minutes NRC voiced a number of concerns and possible areas for improvement of DOE's QA programs. Six of these concerns were generic and NRC raised them in the meeting minutes for all three projects. Additionally, NRC had some project specific comments for each project. In March of 1985 OGR solicited input from each project on how we should respond to these NRC concerns. Responses have been received from the projects and a consolidated approach developed. Because there was not complete agreement among the projects on how to proceed, we feel it prudent to discuss the approach HQ proposes to take and to allow each project manager the opportunity to suggest changes.

Future Plans

Following this project managers' meeting, the OGR position described in attachment 1 will be modified to incorporate all agreed-upon changes and then furnished to NRC in August for their review. Then we would plan to meet with NRC in September to present our views on these issues and to receive any comments they have. After receiving NRC's response we will make any necessary changes to policy and, if necessary, document these changes in the OGR QA Plan.

Description of Attachments:

The following material is attached to this discussion paper:

1. OGR Proposed Position on QA Issues Raised by NRC.
2. Summary of Project Proposed Responses to QA Issues Raised by NRC.
3. BWIP Proposed Response to QA Issues Raised by NRC (March 21, 1985, Olson to Purcell).
4. NNWSI Proposed Response to QA Issues Raised by NRC (March 29, 1985, Vieth to Purcell).
5. SRPO Proposed Response to QA Issues Raised by NRC (April 1, 1985, Neff to Purcell).

OGR PROPOSED POSITION ON QA ISSUES RAISED BY NRC

GENERIC ISSUES

1. Issue: The size of the DOE technical staff may not be sufficient to provide adequate oversight of such a large and complex project.

Response: Continued increases in staff are planned for all projects. The number of staff, their expertise, experience, and responsibilities is examined each year as a part of the budget process. The requirements for staff will be changing with the start of site characterization in FY 86. These changes have been projected in the planning of each of our projects.

2. Issue: The size of the DOE QA staff may also not be sufficient.

Response: Each project now has at least one full-time, dedicated Quality Assurance position filled by a DOE employee. Additional QA personnel will be added when site characterization activities commences. Additional support is and will continue to be supplied by contractors, matrix support from the Quality Assurance group within each field office, and from other qualified and independent project personnel (technical).

3. Issue: U.S. Nuclear Regulatory Commission (NRC) questioned the DOE emphasis on the line responsibilities for QA and advised DOE to be careful to avoid a situation where the NRC required independent QA organization does not or cannot fulfill its responsibilities.

Response: DOE plans to continue to hold the line managers in each project office responsible for the quality of the work performed by the staff and contractors who report to him/her. The QA manager for each project will continue to make an independent assessment, on behalf of the project manager, of the quality of work performed by both the DOE project office and the contractors. The QA manager in each project will continue to report to the project manager. The QA manager may also use line personnel to assist him in the conduct of audits, surveillances, and inspections-- providing the line personnel used have no direct responsibility for the work being audited, surveilled, or inspected.

4. Issue: The extensive dependence on contractors for QA assistance was questioned.

Response: The manager of each project is ultimately responsible for the quality of work performed by that project. Each participating organization and contractor organization is responsible for assuring the quality of their work.

The DOE has historically and continues to rely heavily on contractors for QA assistance. It has been the policy of the Atomic Energy Commission (AEC), Energy Research and Development Administration (ERDA) and DOE to have a small

group of technically competent people manage major projects that are executed by contractors. We do not consider that any change is required in this area.

5. Issue: NRC noted the need for developing an approach to graded Quality Assurance.

Response: We agree and are actively working on a common approach now. We expect to be able to present this to NRC in the near future.

6. Issue: NRC noted the need for an approach for qualifying existing and historical data.

Response: We agree and are actively working on a common approach now. We expect to be able to present this to NRC in the near future. We do expect to limit the application of this to data needed to support the licensing application.

7. Issue: NRC noted the value of readiness reviews and suggested they be included as participants in such reviews.

Response: We agree this would be useful for major decision points in each project and are now planning the scope, schedule, and method of participation by NRC. We would expect the first such review to be conducted just prior to the start of the exploratory chart.

#### BWIP SPECIFIC ISSUES

8. Issue: NASA consultant to NRC noted that separate technical design review teams provided useful additional checks.

Response: The NASA consultant identified this as one means of verifying the quality of technical work. We agree these types of reviews can add value to the project and have included them in our QA program for use as appropriate. As committed during the December 10-11, 1984, meetings, our goal is to have the BWIP QA program fully implemented by October 1985.

9. Issue: USGS has not accepted the project QA requirements.

#### Responses

This issue was raised by DOE during the December 10-11, 1984, meetings and is being actively pursued at this time to assure that future USGS involvement on the BWIP reflects resolution of this area. We expect to discuss this with the USGS at the next quarterly DOE/USGS meeting and anticipate reaching agreement on corrective actions.

10. Issue: NASA consultant noted the value of a central reporting system for problems.

Response: We agree with the usefulness of this tool and are planning to use it.



11. Issue: More trend analysis would be useful.

Response: We agree with the usefulness of this tool and are planning to use it.

#### NNWSI SPECIFIC ISSUES

12. Issue: NRC noted that research activities may have questionable value in licensing.

Response: The results of research activities that DOE will use in licensing will be subjected to the same degree of quality controls that are applied to activities important to safety and waste isolation. We believe NRC will find such results fully acceptable. Research activities that are not important to safety and waste isolation, and which will not be used to support DOE's license application, may not have the same degree of quality controls and, therefore, could not be used by DOE in licensing without a careful review and evaluation of the quality controls used.

13. Issue: Some Project participants appear to hold a view of QA as unnecessary, burdensome, and an imposition.

Response: The view that the NNWSI Project QA program was unnecessary, burdensome, and an imposition stemmed from the "Mickey Mouse QA" statement during the DOE/NRC QA meeting during December 1984. The NNWSI Project has strived to train, educate, and integrate the Project technical staff into the QA program and is continuing to do so. A very high percentage of technical

staff have accepted and adopted QA philosophy attitude toward this work. There will always be a few people in any large group that will require more attention to convince as to the overall role of QA to the successful completion of the Project. There is also a potential for people to say things that they do not mean in a moment of frustration. We believe the single comment at an inappropriate moment is not representative of the majority of personnel in the NNWSI Project and has been overly emphasized.

14. Issue: NRC expressed concern over NNWSI's possible lack of authority and leverage over contractors and Project participants.

Response: WMPO is actively pursuing the management authorities required to effectively manage the NNWSI Project. These authorities will originate from delegations for Contracting Officers, Project Charter, Memorandum of Agreement, or other appropriate vehicles. In order to get these points resolved, OCRWM-OGR will take an active role in discussions with DP, the Albuquerque and San Francisco Operations Offices and the USGS. The Project Manager has raised these points previously since he does not have the authority to change them unilaterally.

15. Issue: NRC was concerned over the USGS management structure (matrix support).

Response: The USGS has examined the existing internal organizational structure for USGS NNWSI Project activities and recommendations proposing alternate organizational structures have been forwarded to the Director, USGS.

#### SRPO SPECIFIC ISSUES

16. Issue: NRC noted the limited use of surveillances by SRPO.

#### Responses

SRPO agrees with NRC concerning the importance of an active surveillance program to assess the effectiveness of subtier QA programs. Although a number of surveillances have been performed by our prime contractors in the past (with limited SRPO participation), they were utilized primarily to deal with specific issues, e.g., QA program developments, sample control, procedure development, records, training. As stated in the meeting with NRC on December 18 and 19, 1984, surveillances were intended to supplement, not replace, the audit program. It was felt that up to this time, this approach was adequate for the activities associated with this project, which were primarily research and data gathering.

As SRPO enters the Site Characterization phase of the project, it will initiate an expanded surveillance program commensurate with the importance of the activities being performed. A SRPO QA procedure for surveillance has been drafted and will be in place prior to beginning site characterization.

17. Issue: NRC noted the usefulness of an umbrella form and content document, like NNWSI's, and lack of one for SRPO.

Response: SRPO, utilizing those aspects of the NNWSI umbrella document appropriate for the SRP program, will develop and issue a similar type

document which will provide further SRP project-wide QA guidance on the development, description and implementation of contractor and subcontractor QA programs in order to obtain maximum uniformity of QA programs utilized on the Salt Repository Project. This effort is scheduled for completion October 1, 1985. Inputs for the umbrella document will come from the SRPO QA Managers meetings.

18. Issue: NRC questioned traceability of ONWI reports to subcontractor reports.

Response: ONWI has developed an action plan in response to this comment which is intended to correct the noted conditions. This plan has been submitted to SRPO and is presently being reviewed by SRPO for adequacy.

## Attachment 2

## SUMMARY OF PROJECT PROPOSED RESPONSES TO QA ISSUES RAISED BY NRC

	BWIP	NNWSI	SRPO
1. DOE technical staff is too small.	agree	agree	agree
2. DOE QA staff is too small.	agree	agree	agree
3. DOE has too much emphasis on line responsibility for QA.	agree	<u>disagree</u>	<u>disagree</u>
4. DOE depends too much on contractors for QA assistance.	agree	agree	<u>disagree</u>
5. DOE needs an approach to graded QA.	agree	agree	agree
6. DOE needs an approach for qualifying historical data.	agree	agree	agree
7. DOE should conduct readiness reviews and include NRC.	agree	<u>disagree</u>	agree
8. Separate technical design review teams should be used.	agree	N/A	
9. USGS needs to accept DOE QA requirements.	agree	N/A	
10. A central problem reporting system is needed.	agree	N/A	
11. More trend analysis would be useful.	agree	N/A	
12. R&D activities may have questionable licensing value.	N/A	<u>disagree</u>	
13. Some project participants think QA unnecessary and burdensome.	N/A	agree	
14. DOE lacks authority over some contractors and participants.	N/A	agree	
15. USGS management structure (matrix support) needs improving.	N/A	agree	
16. DOE should use more surveillances.	N/A	N/A	agree
17. DOE needs an umbrella QA document.	N/A	N/A	agree
18. DOE should improve traceability of ONWI reports.	N/A	N/A	agree

QA STATUS REPORT - JULY 1985

QA STATUS REPORT  
MINUTES  
2/30-9/1/85  
ATTACHMENT # 4  
Date

1. Update HQ QA Plan

- |    |   |          |
|----|---|----------|
| A. | Revision of QA Plan (on hold pending review on need for revision) | Open     |
| B. | Update as necessary to include additional project guidance        | 10/30/85 |

2. Issue Additional HQ Quality Implementing Procedures

- |    |   |                                 |
|----|---|---------------------------------|
| A. | HQ review of project QA Plans and Administrative Procedures QIP 2.0 | Draft 4/8/85*<br>Final 7/26/85  |
| B. | Indoctrination and Training QIP 2.1                                 | Draft 4/2/85*<br>Final 8/16/85  |
| C. | Peer Reviews QIP 3.1  | Draft 6/21/85*<br>Final 8/6/85  |
| D. | Document Control QIP 6.0  | Draft 6/10/85*<br>Final 8/2/85  |
| E. | Significant Problem Reporting and Corrective Action QIP 16.0        | Draft 4/8/85*<br>Final 7/26/85  |
| F. | QA Records QIP 17.0   | Draft 6/10/85*<br>Final 7/29/85 |
| G. | Headquarters Review of Project Submitted Audit Reports QIP 18.2     | Draft 4/8/85*<br>Final 8/9/85   |
| H. | Internal Audits QIP 18.4  | Draft 4/8/85*<br>Final 7/26/85  |
| I. | Procurement Document Control QIP 4.0                                | Draft 8/30/85<br>Final 11/15/85 |

3. Initiate OGR QA Indoctrination and Training Program

- |    |  |           |
|----|--|-----------|
| A. | Draft procedure issued for comment               | 04/02/85* |
| B. | Final procedure issued                           | 8/16/85   |
| C. | First training session conducted                 | 9/13/85   |
| D. | QA auditor training course (in-house or outside) | 12/31/85  |

\* Denotes Action complete

#### 4. Conduct Internal OGR QA Audits

- |    |   |         |
|----|---|---------|
| A. | Send notification letter                              | 1/20/86 |
| B. | Prepare check list                                    | 2/1/86  |
| C. | Conduct audit   | 2/20/86 |
| D. | Audit report issued                                   | 3/20/86 |
| E. | Corrective action review                              | 5/20/86 |
| F. | Notification of acceptability of<br>corrective action | 7/15/86 |

#### 5. Audit Project Offices

##### A. NNWSI

##### 1. Audit Activities

- |   |  |           |
|---|--|-----------|
| o | audit notification letter                                      | 2/5/85*   |
| o | prepare audit check list                                       | 02/19/85* |
| o | conduct NNWSI audit  | 3/4-7/85* |
| o | issue audit report   | 3/27/85*  |
| o | evaluate corrective action responses                           | 7/1/85*   |
| o | notify NNWSI of acceptability of corrective<br>action response | 7/29/85   |

##### 2. Summary of Audit

##### Findings

- o Management controls are not documented between project and most participating organizations.
- o WMPO has not documented and established a Records Management System.
- o QA program does not describe provisions for the resolution of disputes involving quality or define a PQM position.
- o Audit Team Leader on the LANL and SNL audit was not certified to the requirements of NQA-1.

##### Observations

- o Copies of the five OGR baseline documents were not readily available in branch chief offices nor were they familiar with them.



- o Initial proficiency evaluation for WMPO personnel were not in the QA files.
- o WMPO does not, to a reasonable representative degree, perform audits of representative subcontractors, consultants or vendors.
- o WMPO QA plan does not adequately describe how the yearly management assessment of the QA Program is performed.
- o Internal audits have been scheduled but have not commenced.

## B. BWIP

### 1. Audit Activities

- o audit notification letter 2/5/85\*
- o prepare audit check list 4/5/85\*
- o conduct BWIP audit 5/20-23/85\*
- o issue audit report 6/20/85\*
- o evaluate corrective action responses 8/5/85
- o notify BWIP of acceptability of corrective action responses. 8/19/85

### 2. Summary of Audit

#### Findings

- o The project has not issued procedures covering Stop Work, Nonconformances, Corrective Action, Indoctrination and Training, Management Assessment, Peer Review, Document Control, Surveillance, Design Control, Procurement Document Control, Document Review, and QA Records. (Procedures must be in place before site characterization activities can commence.)
- o The project has not audited representative subcontractors, consultants, vendors and laboratories.
- o Audit findings have not been tracked, analyzed for trends or closed out.
- o Organizational responsibilities for reviewing, approving and verifying designs are not specified in project documents nor is QA involvement given.
- o Procurement document review by QA personnel has not been performed.
- o Project requirements for review and concurrence with contractors procedures for safety related items or activities are not defined.

- o Items important to safety and waste isolation have not been identified.

#### Observations

- o A management position that retains overall authority and responsibility for the QA program has not been identified within the project.
- o Additional clarity should be provided for implementation of management controls and establishing effective communications channels.

#### C. SRPO

##### 1. Audit Activities

- o audit notification letter 2/5/85\*
- o prepare audit check list 5/31/85\*
- o conduct SRPO audit 7/8-11/85\*
- o issue audit report 7/19/85\*
- o evaluate corrective action responses 9/24/85
- o notify SRPO of acceptability of corrective action response 10/8/85

##### 2. Summary of Audit

#### Findings

- o Performance requirements are not specified for repository system components as required by the NRC Review Plan. Also, the items which are important to waste isolation have not been identified nor has a graded approach to QA been established.
- o The required QA reviews are not required by the SRPO QAPs and are not being performed by SRPO.
- o The procedure for documenting and controlling non-conformances does not meet the requirements of the NRC QA Review Plan and is not effectively implemented. The procedure for corrective action, likewise, neither meets the requirements nor is being effectively implemented.
- o SRPO has not implemented a QA Records System that meets the requirements of the NRC QA Review Plan.
- o The SRPO auditing program does not meet the requirements of the NRC QA review Plan and of NQA-1.

- o The SRPO QA Program does not include a commitment for the control of computer programs and procedures describing the controls have not been provided.
- o The SRPO QA Program does not require the assessments to be made by management above or outside the QA organization. There is no evidence that management assessments have been made by individuals above or outside the QA organization.
- o The indoctrination, training and qualification programs required by the NRC QA Review Plan have not been established.
- o The SRPO QA Program does not describe the involvement of the QA Organization in supplier selection and bid evaluation.

#### Observations

- o In reviewing the Battelle contract and modifications and the Parsons-Redpath contract and modifications, evidence that reviews of procurement documents had been performed was not always available in the files of the chief of contracts and administration. In addition, the evidence of approvals, when available, was inconsistent in format.
- o The SRPO does not have an audit tracking system. Audit tracking is performed by ONWI, but documentation of the results is not routinely provided to the SRPO.

Also, no trending has been performed to date.

#### D. CRPO

##### 1. Audit Activities

- |  |          |
|--|----------|
| o audit notification letter                                  | 8/05/85  |
| o prepare audit check list                                   | 8/30/85  |
| o conduct CRPO audit   | 9/17/85  |
| o issue audit report   | 10/15/85 |
| o evaluate corrective action responses                       | 12/10/85 |
| o notify CRPO of acceptability of corrective action response | 1/15/86  |

##### 2. Summary of Audit

later

#### 6. Participate in Project Audits of Contractors

- |                            |          |
|----------------------------|----------|
| A. Prepare master schedule | 2/15/85* |
|----------------------------|----------|

B.	Make assignments to OGR auditors	3/1/85*
C.	Participate in audit of TBEG by SRPO	4/17/85*
D.	Participate in audit of Kaiser (desk) by BWIP	4/29/85*
E.	Participate in audit of Rockwell (Field) by BWIP	5/85**
F.	Participate in audit of Morris/Knudson by BWIP	6/85**
G.	Participate in audit of Flour by SRPO	6/11/85*
H.	Participate in audit of Kaiser/Oakland by BWIP	6/85**
I.	Participate in audit of LLNL by WMPO	7/08/85
J.	Participate in audit of Rockwell by BWIP	7/85
K.	Participate in audit of ONWI by SRPO	8/6/85
L.	Participate in audit of Parsons-Redpath by SRPO	8/27/85
M.	Participate in audit of SNL by WMPO	8/05/86
N.	Participate in audit of H & N by WMPO	8/12/85
O.	participate in audit of F & S by WMPO	8/26/85
P.	Participate in audit of LANL by WMPO	9/03/85
Q.	Participate in audit of Battelle PNL by SRPO	9/16/85
R.	Participate in audit of SAIC by WMPO	9/23/85
S.	Participate in audit of LLNL by SRPO	9/30/85
T.	Participate in audit of USGS Denver by WMPO	9/17/85
U.	Participate in audit of USGS Menlo Park by WMPO	9/23/85
V.	Participate in audit of REECO by WMPO	9/10/85

7. Analyze Project Audit Reports (Oct. 84 through May 85)

A.	Audit Reports transmitted to DOE-HQ	
1.	BWIP	2
2.	NNWSI	3

---

\* Completed

\*\* Postponed - To Be Rescheduled

3.	SRPO	5
4.	CRPO	<u>0</u>
	Totals	10

B. Audits Scheduled

1.	BWIP	4
2.	NNWSI	6
3.	SRPO	10
4.	CRPO	<u>1</u>
	Totals	21

C. Summary of Results

<u>Auditor</u>	<u>Auditee</u>	<u>Date</u>	<u>Find.</u>	<u>Obs.</u>
SRPO	ONWI	10/29/84	1	1
DOE/CH	SRPO	12/11-13/84	3	5
SRPO	Bendix	1/16-18/85	1	2
SRPO	Pacific Northwest Lab	4/2-4/85	0	0
BWIP	Pacific Northwest Lab	4/2-4/85	7	2
NNWSI	WMPO	4/10-11/85	3	7
SRPO	Texas BEG	4/17-18/85	2	1
BWIP	RKE/PB	4/29-5/1/85	7	1
NNWSI	WMPO	5/1-2/85	3	2
NNWSI	WMPO	5/8-9/85	<u>1</u>	<u>3</u>
	Totals		28	24

D. Breakdown of Findings/Observations

<u>Category</u>	<u>Find</u>	<u>Obs.</u>
Organization	2	1
Training/QA Program	6	2
Design/Peer Review	2	2
Procurement Activities	4	3
Procedures	1	4
Document Control	1	0
Identification & Control	1	0
Inspection	1	5
Calibration	1	0
Nonconformances	3	1
Records	3	3
Audits	<u>3</u>	<u>3</u>
Totals	28	24

E. Analysis of Reports

- o From the small amount of data presented no trends could be established.
- o A majority of the audits scheduled for FY85 (45) have been delayed until the last quarter.
- o WMPO is reviewing all contractors QA Plans which is causing their audit delays. BWIP has QA personnel shortages, which will likely cause further delays; efforts are being concentrated on development of internal procedures.

8. Issue Program Wide Policy Guidance

- |  |          |
|--|----------|
| A. Issue important to safety (Q-list) methodology. | 7/31/85* |
| B. Issue QA Handbook for Geologic Investigations.  | 8/15/85  |
| C. Issue program wide QA requirements.             | TBD      |
| 1. Qualification of personnel                      | TBD      |
| 2. Computer software control                       | TBD      |
| 3. Control of measuring and test equipment         | TBD      |
| 4. QA records                                      | TBD      |
| 5. Reliability of existing data                    | TBD      |
| 6. Peer reviews                                    | TBD      |
| 7. QA for research and development                 | TBD      |
| 8. Oversight of field activities                   | TBD      |
| 9. Significant problem reporting                   | TBD      |

9. Resolve NRC QA Concerns

- |   |          |
|---|----------|
| A. Input from projects on NRC issues raised during December 84 site visits. | 3/29/85* |
| B. Proposed DOE position on independence of QA position.                    | 8/15/85  |
| C. Proposed DOE position on dependence on contractors.                      | 8/15/85  |
| D. Proposed DOE position on graded QA.                                      | 8/15/85  |
| E. Proposed DOE position on qualifying historical data.                     | 8/15/85  |

- F. Proposed DOE position on readiness reviews. 8/15/85
  - G. Proposed DOE position on NNWSI control of participants. 8/15/85
  - H. Proposed DOE position on USGS matrix management approach. 8/15/85
  - I. Follow-up meeting with NRC. 9/15/85
10. Provide SCP Input
- A. Guidance to project QA managers (check list) 5/15/85\*
  - B. Meeting among project participants to discuss issues 7/30/85
  - C. Final guidance 8/30/85
11. Conduct QACG Meetings
- A. Issue agenda for July '85 meeting 6/28/85\*
  - B. Conduct July meeting 7/30-8/1/85
  - C. Distribute meeting minutes 8/16/85
  - D. Issue agenda for Oct '85 meeting 9/30/85
  - E. Conduct Oct. meeting 10/29-31/85
  - F. Distribute meeting minutes 11/15/85