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9C

United States Government

Department of Energy

## memorandum

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DATE: MAY 9 1984

'85 JUL 30 P3:47

Subj file 9.1

REPLY TO:

ATTN OF: RW-23

SUBJECT: SRPO QA Manual Revision 1

TO: Jeff Neff, Salt Repository Project Office

Thank you for the opportunity to review the SRPO QA Manual Revision 1. It is well written and represents a fine effort on the part of your office. We have a number of suggestions we think will be beneficial.

The manual was submitted by you for comment prior to the QA Coordinating Group (QACG) meeting of April 11-12, 1984. It thus references NQA-1, 1979 edition and the Carl Cooley QA guidance memorandum dated 10/27/81. It was decided at the QACG meeting that NQA-1, 1983 edition would apply and that the Carl Cooley memorandum would be superseded by updated QA guidance, which was recently issued. We also feel greater consistency would result by changing the title of the document from Quality Assurance Manual to Quality Assurance Plan since the BWIP and WMPO projects are using the title Quality Assurance Plan. More specific comments are provided in the attachment. Please contact Carl Newton if any clarification is needed.

I am asking you to resubmit the QA Plan to HQs for approval when your revisions are complete.

JW Bennett

J. William Bennett  
Acting Associate Director  
Office of Geologic Repository  
Deployment

Attachment

cc: ✓ E. Sulek, Weston  
G. Langston, NE-74  
G. Bracken, RL  
H. Melancon, NV

WM Record File

405

WM Project 1

Docket No.

PDR ✓

LPDR

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To: Hedges

SEE QA LIBRARY FOR QA PLAN COPY  
(MANUAL)

HQ-OGRD COMMENTS ON SRPO  
QUALITY ASSURANCE MANUAL, REVISION 1

QAP #1.0 Organization.

- a) 2.0, references NQA-1-1979 should be NQA-1-1983
- b) 4.1.(e), identifies stop work authority. Shouldn't procedures controlling stop work activities be provided?
- c) General comment, USGS liaison and legal counsel are shown on organization chart but responsibilities, roles, or interfaces are not discussed in the text.

QAP #2.0 Quality Assurance Program

- a) 2.0, 3.1, and 3.2 refer to NQA-1-1979. This should be NQA-1-1983. Also Attachment A contains NQA-1 modifications based on Headquarters guidance dated 10/27/81. This guidance has been superseded. Shouldn't references include supplements 2S-1, 2S-2, and 2S-3?
- b) 3.2(C), the criteria refers to "Program/Projects" which are "Major or Prime", shouldn't major or prime projects be better defined?

QAP #3.0 Project Design Control

- a) 2.0 should reference NQA-1-1983, not 1979. Should not supplement 3S-1 be referenced?

- b) 5.1 should not SRPO's method for identifying to the contractor and controlling design documents and changes be prescribed in detail? This is part of overall configuration control. Is SRPO's method for review and approval of contractor submitted design documents and changes described in another procedure? Shouldn't it be?

#### QAP #3.1 Research and Development Controls

5.1 requires SRPO chiefs to evaluate work plans submitted for approval for technical adequacy and QA procedures. How is this review documented?

#### QAP #5.0 Procurement Document Control

5.0 specifies that quality related activities will be conducted by SRPO in accordance with procedures contained in the SRPO QA manual. Is there another level of QA implementation procedures? If so, should they be referenced?

#### QAP #6.0 Document Control

- a) Purpose is to control "these procedures and other documents". Can we identify the other documents?
- b) 5.1.e refers to the office support contractor. Who is this? Can we be more specific?

#### QAP #8.0 Identification and Control of Materials

Paragraph 4.0 refers to the "Project Integrator". Is this ONWI? Should the procedure be specific and identify the integrator?

#### QAP #11.0 Test Control

Paragraph 3.0 refers to Attachment A to QAP 2.0. If Attachment A is revised, this paragraph of QAP 11.0 may be affected. Modifications, if required, should be contained in this procedure.

#### QAP #13.0 Handling, Shipping, and Storage

Paragraph 4.0 - Who is the technical support contractor? Is it the integrator or office support contractor? Shouldn't the procedures be consistent and specific in identifying contractors?

#### QAP #15.0 Nonconforming Material

Paragraph 4.0 delegates responsibility for the control of nonconforming material totally to the contractors. What if SRPO discovers a nonconformance during routine surveillances or overview? Shouldn't there be provisions for SRPO to report nonconformances or will SRPO report nonconformances via corrective action request per QAP 16.0?

#### QAP # 16.0 Corrective Action

- a) 3.2 makes reference to situations which have a reasonable chance for correction within a year. This needs expansion or clarification.
- b) 3.4 requires the QA manager to maintain a corrective action log. Can the information contained in the log and its use be detailed in this procedure?

#### QAP #17.0

- a) 5.3 does not meet 17S-1, Paragraph 4.1 for storage and preservation.
- b) 5.4 a system for receipt and storage of SRPO generated records should also meet basic requirement 17 and supplement 17S-1. Definition of lifetime and non-permanent records should be provided.

#### QAP # 18.1 Auditor Qualification

- a) Paragraph 5.4 does not meet the qualification records requirements of Supplement 2S-3, paragraphs 6.1, 6.2, and 6.3.
- b) Paragraph 5.1 does not meet the requirements of Supplement 2S-3, paragraphs 3.1 through 3.4.

#### General Comment

All procedures should reference NQA-1-1983 instead of NQA-1-1979 and since all supplements apply, each procedure should reference all supplements which apply to that procedure. Any modification to any basic or supplementary requirement should be provided within the affected procedure.

# memorandum

*Subj file 9.1*

DATE: \_\_\_\_\_  
 REPLY TO: \_\_\_\_\_  
 ATTN OF: RW-23  
 SUBJECT: SRPO QA Manual - Headquarters Approval of Revision 2  
 TO: Jeff Neff, SRPO

Thank you for the opportunity to review Revision 2 of the SRPO QA Manual, which was submitted to Headquarters by a letter from Ram B. Lahoti dated July 17, 1984. Our review has focused primarily on the compliance of your QA Manual with the requirements of the NRC QA Review Plan. With this in mind, we have the following comments:

1) QAP 2.0 Quality Assurance Program

The NRC Review Plan, Appendix A, Paragraph 2.1 and Criteria II of Appendix B to 10 CFR 50 require that the documents establishing a QA program must identify the items and activities covered by the QA program and the rationale for determining how items or activities important to safety are selected. This information is missing from the SRPO QA Plan. We recognize that the general issue of how the repository program will define the items or activities important to safety or waste isolation is still under review by the QA Coordinating Group and has not yet been approved by OCRWM. Nevertheless, the QA plan should be revised to include a section where this material may be inserted when it is complete. In the interim, the rules currently being followed by SRPO should be specified there. In recognition of the fact that these are interim requirements, this section should be marked as "Interim, Pending Development of Final Requirements."

2) QAP 3.2 Verification of Technical Work

The NRC Review Plan, Appendix A, Paragraph 3.8, and Criteria III of Appendix B to 10 CFR 50 require that procedures defining the selection process for a peer group and the process by which the peer group conducts its review be developed. The SRPO QA Plan fails to cover these requirements, and they should be added.

3) QAP 17.0

The sentence "Until a repository construction license is issued, normal business practice is considered adequate to protect and maintain the SRPO generated records." should be deleted. This sentence does not meet the requirements of the NRC Review Plan, Appendix A, Section 17 and criteria XVII of Appendix B to 10 CFR 50. The specifics, such as types of records to be maintained, how they are stored, and where they are stored should be added to meet requirements.

4) QAP 18.1 Auditor Qualification

The last sentence of Paragraph 3.2, "Other team members may have direct responsibility for performance of the activities to be audited.", should be deleted. This sentence does not meet the requirements of the NRC Review Plan, Appendix A, Paragraph 18.5 and Criteria XVIII of Appendix B to 10 CFR 50.

Additional comments, that do not derive directly from the NRC Review Plan, but which you may wish to consider in your revision are offered in the attachment.

Due to the nature of the comments provided in this memorandum, we request that you revise the SRPO QA Manual and resubmit it for Headquarters approval. We would be pleased to provide assistance to you in developing resolutions to our comments if you would find that helpful, or to provide clarification of any comments in this memorandum if needed. In either event, the point of contact on my staff is Carl Newton on FTS 252-1248.

Please advise this office by January 15, 1985 of your schedule for resolving the comments provided by this memorandum and resubmitting the SRPO QA manual. In the meantime until Headquarters has completed approval of the SRPO QA Manual, we have no objection to your interim use of a QA Plan revised as specified in this memorandum.

William J. Purcell  
Associate Director  
Office of Geologic Repositories

Attachments:

Quality Assurance Manual, Revision 2  
HQ-OGR Comments on SRPO

HQ-OGR Comments on SRPO  
Quality Assurance Manual, Revision 2

QAP 1.0 Organization

- a. Paragraph 3.3 uses the title "Office of Geologic Repository Deployment". Change to "Office of Geologic Repositories".
- b. Organization Chart - USGS liaison is shown on the Organization Chart, but neither role responsibility nor interface is discussed in the text.

QAP 3.0 Project Design Control

Applicable DOE design inputs described in Paragraph 5.1, such as design bases and performance requirements, should be identified, documented, specified and controlled. These requirements should be added to this section.

QAP 4.0 Procurement Document Control

- a. Add to this section a statement that changes to procurement documents are subject to the same degree of control as used in the preparation of the original.
- b. Add to the program a description of the types of contractors documents to be submitted for review and concurrence and described the review and concurrence process.

QAP 7.0 Control of Purchased Items and Services

A statement should be added to the program that source evaluation and selection is performed, and that it is performed to a written procedure.

QAP 16.0 Corrective Action

Add to the program provisions for analyzing and reporting both the project office - and the contractor-identified nonconformances and corrective action reports to permit early detection of quality trends.

QAP 17.0 Records

The program should be expanded to state that records are protected against damage, deterioration, or loss and further describe where the records are stored and how they are protected.



# memorandum

File 9.2

DATE JAN 3 1985

REPLY TO  
ATTN OF RW-23SUBJECT BWIPO QA PLAN - HEADQUARTERS APPROVAL OF REVISION O  
TO Lee Olson, BWIP

Thank you for the opportunity to review Revision O, of the BWIPO QA Plan, which was submitted to Headquarters by a letter from O. L. Olson to J. W. Bennett dated August 17, 1984. Our review has focused primarily on the compliance of your QA Plan with the requirements of the NRC QA Review Plan. With this in mind, we have the following comments:

## 1) Quality Assurance Plan

To meet the requirements of the NRC Review Plan, Appendix A, Paragraph 2.1 and Criteria II of Appendix B to 10 CFR 50, the QA Plan must identify the items and activities covered by the QA program and the rationale provided for determining how items or activities important to safety or waste isolation are selected. We recognize that the general issue of how the Repository Program will define the items or activities important to safety or waste isolation is still under review by the QA coordinating group and has not yet been approved by OCRWM. Nevertheless, the QA Plan should be revised to include a section where this material may be inserted when it is complete. In the interim, the rules currently being followed by BWIPO to identify items covered by the QA Plan should be specified there. In recognition of the fact that these are interim requirements, this section should be marked as "Interim, Pending Development of Final Requirements."

## 2) Design Control

To meet the requirements of the NRC Review Plan, Appendix A, Paragraph 3.8, a statement should be added to specify that the BWIPO QA procedures define the selection process for a peer group and the process by which the peer group conducts its review.

## 3) Instructions, Procedures and Drawings

To meet the requirements of the Office of Geologic

Repositories Quality Assurance Plan, Section VII.A.8), the QA Plan should identify the types of contractor documents to be submitted for review and approval. It should also describe the review and approval process. This might be partially covered in Item 6 on page 7, but we are uncertain as to its meaning.

4) Control of Purchased Items and Services

To meet the requirements of the NRC Review Plan, Appendix A, Paragraph 7.2, all procurement of items or services, and the evaluation and selection of suppliers must be performed in accordance with written procedures. This requirement should be added to the QA Plan.

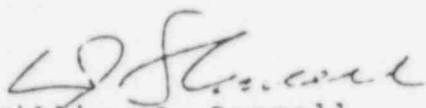
In addition to the comments listed above, we note that the requirements of the NRC Review Plan, Appendix A, Paragraph 1.10 state that a QA management position must be established within the DOE organization "at the same or higher organizational level as the highest line manager directly responsible for performing activities affecting quality" and that this QA manager should have "no other duties or responsibilities unrelated to QA that would prevent full attention to QA matters." Since BWIPO relies on RL for QA support, the Project Office itself clearly does not meet the NRC requirement. However, it is not clear that the requirement needs to be applied just to the Project Office, especially at this stage in the program. In recognition of these uncertainties, we are not asking you to take any action on this item at this time. Headquarters will pursue this item in more detail with the NRC staff and let you know of the result as soon as possible.

Further comments, that do not derive directly from the NRC Review Plan, but which you may wish to consider in your revision, are provided in the Attachment.

Due to the nature of the comments provided in this memorandum, we request that you revise the BWIPO QA Plan and resubmit it for Headquarters approval. We would be pleased to provide assistance to you in developing resolutions to our comments if you would find that helpful, or to provide clarification of any comments in this memorandum if needed. In either event, the point of contact on my staff is Carl Newton on FTS 252-1248.

Please advise this office by January 15, 1985 of your schedule for resolving the comments provided by this memorandum and resubmitting the BWIPO QA Plan. In the meantime, until

Headquarters has completed approval of the BWIPO QA Plan, we have  
objection to your interim use of a revised QA Plan as suggested  
in this memorandum.

  
William J. Purcell  
Associate Director  
Office of Geologic Repositories  
Office of Civilian Radioactive  
Waste Management

Attachment:

HQ-OGR Comments on BWIPO Quality Assurance Plan, Revision 0

HQ-OGR Comments on BWIPO  
Quality Assurance Plan, Revision 0

1. Organization

a. Page 2 of 22 1st line

*done* Change "The Director of the Office of Geologic Repository Deployment (OGRD)" to "The Director of the Office of Geologic Repositories (OGR)."

b. Page 3 of 22 Figure 1

*done* *use figure from OGR WAP* Change "The Director of the Office of Geologic Repository Deployment (OGRD)" to "The Director of the Office of Geologic Repositories (OGR)."

2. Quality Assurance Plan

a. Page 12 of 22 QA Policies 6th line

*done* Change "The Director of the Office of Geologic Repository Deployment (OGRD)" to "The Director of the Office of Geologic Repositories (OGR)."

b. Page 13 of 22 Program Assessment

*done* Change "OGRD" to "OGR".

3. Design Control

*done* The first sentence should be changed to read "When design activities . . . The Project Office should conduct peer reviews . . ."

. The following cannot be found in the QA Plan, but might be addressed in specific Project Management Procedures:

3. Design Control

*done - add one word on pg 44* a. The requirement that applicable design inputs such as design bases and performance requirements are identified, documented and specified.

4. Procurement Document Control

*done* a. The requirement that procurement documents require contractors and subcontractors to provide access to plant facilities and records for inspection or audit.

*done* b. The requirement in the procedures that changes to the procurement documents are subject to the same degree of control as used in the preparation of the original.

18. Audits

*done* The requirement that all findings are promptly responded to in writing.

FOR OCRWM DISTRIBUTION

SUBJECT: Approval of BWIP QA Plan

ADDRESSEES: O. L. Olson

OCRWM DISTRIBUTION

C. Head, RW-23  
R. Stein, RW-23  
✓ E. Sulek, Weston  
M. E. Langston, RW-43

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United States Government

Department of Energy

# memorandum

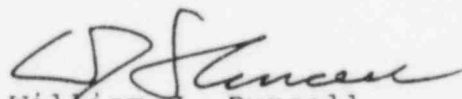
DATE: MAY 15 1985

REPLY TO  
ATTN OF: RW-23

SUBJECT: Approval of BWIP Quality Assurance (QA) Plan

TO: O. L. Olson

HQ furnished comments to you on your draft QA Plan in a January 3, 1985, memo. Your revised QA Plan was resubmitted to HQ for approval by a March 28, 1985, memo. We have reviewed the Plan and find that you have satisfactorily responded to all our comments. Accordingly, we are approving the Plan for use by BWIP. Any subsequent changes to the BWIP QA Plan and issuance of any procedures are to be approved by HQ.



William J. Purcell  
Associate Director  
for Geologic Repositories  
Office of Civilian Radioactive  
Waste Management

*jm* *JM*  
*file 9.2*

United States Government

Department of Energy

# memorandum

*Subj. file # 9.3*

DATE: MAY 9 1984

REPLY TO

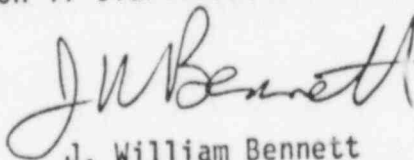
ATTN OF: RW-23

SUBJECT: WMPO-NV Draft Quality Assurance Plan, Revision 2

TO: Donald Vieth, NNWSI Project Office, NV

Thank you for the opportunity to review the draft Waste Management Project Office (WMPO) QA Plan, NVO-196-17. It is well written and represents an excellent effort on the part of your office. We feel the document provides information not only necessary to your project, but useful for HQs as well. It effectively describes the WMPO-NV organizational structure, identifies interfaces and defines quality assurance program requirements for all participating organizations. We have no further comment on NVO-196-17, Draft Revision 2 and request a copy be provided to HQs when formally issued by your office.

We feel that HQs should not review NVO-196-17 for approval purposes. Rather, NVO-196-18, Waste Management Project Office Quality Assurance Plan, which is now under revision by your office, appears to be the document which delineates the QA program plan for WMPO personnel. This is the DOE project office QA document we intended in our November 4, 1983, memorandum to review and approve. Accordingly, I am asking you to submit NVO-196-18 for HQs review and approval. Please contact Carl Newton if clarification is needed.



J. William Bennett  
Acting Associate Director  
Office of Geologic Repository  
Deployment

cc: ✓ E. Sulek, Weston  
G. Langston, NE-74  
R. Lahoti, SRPO  
G. Bracken, RL



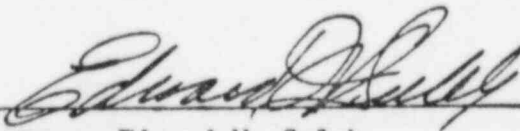
## NWTS PROGRAM CONCURRENCE

**TITLE OF DELIVERABLE:** DOE/HQ Comments on WMPO-NV QA Plan

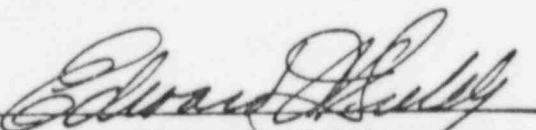
**TASK NUMBER:** 3001-02-42-05

**ASSIGNED DELIVERABLE DATE:** 4/30/84

**ACTUAL DELIVERY DATE:** 5/01/84

  
\_\_\_\_\_  
**TASK MANAGER:** Edward W. Sulek

4/30/84  
DATE

  
\_\_\_\_\_  
**TASK LEADER:** Edward W. Sulek

4/30/84  
DATE

  
\_\_\_\_\_  
**PROGRAM COORDINATION MANAGER - JAMES F. STRAHL**

5/1/84  
DATE





WESTON WAY  
WEST CHESTER, PA. 19380  
PHONE: (215) 692-3030  
TELEX: 83-5348

April 30, 1984

Mr. Mark W. Frei, Acting Director  
Engineering and Licensing Division  
Office of Geologic Repository  
Deployment  
U. S. Department of Energy  
GTN (S-10), Room J-413  
Washington, DC 20545

SUBJECT: DOE/HQ Comments on WMPO-NV QA Plan  
Work Order No. 3001-02-42-05

Dear Mr. Frei:

We have reviewed Draft QA Plan (NVO-196-17), Revision 2 which was submitted, by WMPO-NV, for review and approval in response to the DOE/HQ memorandum dated November 4, 1983.

We have no comment on NVO-196-17 except that it is a well composed document which provides necessary and useful information. It effectively describes the WMPO-NV organizational structure, identifies interfaces and defines quality assurance program requirements for all participating organizations. It should have been submitted for HQ information but not for approval.

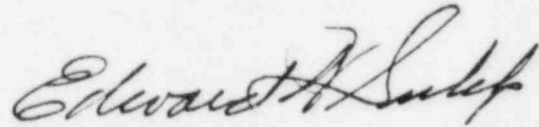
NVO-196-18, waste management project office quality assurance program plan appears to be the document that delineates the project office specific QA program and thus should be the one to be reviewed and approved by HQ. We understand NVO-196-18 is currently under revision by WMPO-NV.

It is recommended that the attached draft memorandum be sent to WMPO-NV to transmit HQ comments on NVO-196-17 and to request that NVO-196-18 be submitted for HQ review and approval.

Should any question arise or additional information be required, please call me.

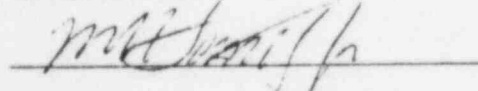
Sincerely,

ROY F. WESTON, INC.



Edward W. Sulek  
Manager, Quality Assurance  
Department

APPROVED BY:



Amir A. Metry, Ph.D., P.E.  
Program Manager

Attachment

cc: J. W. Bennett  
R. Stein  
J. Fiore  
C. Newton  
W. Hewitt  
E. Gilardi  
J. Strahl  
B. Thompson

RW-23

WMPO-NV Draft Quality Assurance Plan, Revision - 2

Donald L. Vieth, Director, WMPO-NV

Thank you for the opportunity to review the draft WMPO QA Plan, NVO-196-17. It is well written and represents an excellent effort on the part of your office. We feel the document provides information not only necessary to your Project but useful for Headquarters as well. We have no further comment on NVO-196-17, Draft Revision 2 and request a copy be provided to Headquarters when formally issued.

We feel that Headquarters should not review NVO-196-17 for approval purposes. Rather, NVO-196-18, Waste Management Project Office Quality Assurance Plan appears to be the document which delineates the WMPO-NV specific QA Program Plan. Accordingly, I am asking you to submit NVO-196-18 for Headquarters review. Please contact Carl Newton if clarification is needed.

cc: E. Sulek, Weston  
G. Langston, NE-74



## Department of Energy

Nevada Operations Office

P. O. Box 14100

Las Vegas, NV 89114-4100

NOV 30 1983

J. William Bennett, Acting Associate Director, Office of Geologic Repository  
Deployment, HQ (RW-20) GTN

### QUALITY ASSURANCE (QA) GUIDANCE

Enclosed are copies of the NNWSI QA Audit Schedule for FY 1984 and the audit reports for NNWSI QA audits conducted by WMPO/NV during FY 1983.

In accordance with agreements reached during a meeting on November 9, 1983, attended by Gene Langston, Carl Newton, and John Rinaldi, NV QA Director, WMPO/NV will send copies of audit reports and significant related correspondence for QA audits conducted during FY 1984.

The NNWSI QA Plan, NVO-196-17 (Rev. 1), is now being revised and a draft of Revision 2 is due to WMPO/NV by December 15, 1983. A copy for DOE/HQ review should be available by January 30, 1984. As also agreed upon during the November 9th meeting, WMPO/NV will not submit copies of implementing QA procedures to DOE/HQ. These procedures will be made available during audits of the NNWSI QA activities by DOE/HQ personnel.

  
Donald L. Vieth, Director  
Waste Management Project Office

WMPO:HLM-252

Enclosures:  
As stated


cc w/o encls:

D. C. Newton, HQ (RW-23) GTN

M. E. Langston, HQ (NE-74) GTN

J. R. Rinaldi, QAD

S. H. Klein, SAI, Las Vegas, NV

Edward Sulek, Weston, Rockville, MD 

NNWSI Project File

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FOR OCRWM DISTRIBUTION

SUBJECT: APPROVAL OF QUALITY ASSURANCE PLAN

ADDRESSEE: Don Vieth

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- R. Stein, RW-23
- J. W. Bennett, RW-21
- M. E. Langston, RW-43

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# memorandum

DATE: APR - 6 1985

REPLY TO  
ATTN OF: RW-23

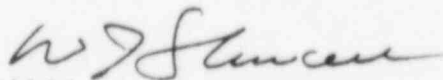
SUBJECT: Approval of Quality Assurance Plan

TO: Don Vieth

Thank you for the opportunity to review the Waste Management Project Office (WMPO) Quality Assurance Program Plan (QAPP) NVO-196-18 (Rev. 2). Since the QA requirements for the Nevada Nuclear Waste Storage Investigations (NNWSI) participating organizations are contained in the NNWSI Quality Assurance Plan (QAP), NVO-196-17 (Rev. 3), OGR has concluded that the NNWSI QAP must also be approved by Headquarters. Accordingly, we are acting on both documents in this memorandum. We also reviewed the twelve Quality Management Procedures (QMP's) in Section II of the WMPO QAPP and the three Standard Operating Procedures (SOP's) submitted with the NNWSI QAP. The QMP's 01-01; 02-01; 02-02; 03-01; 06-01; 06-02; 06-03; 07-01; 15-01; 16-01; 16-02; and 18-01 and the SOP's 02-01; 03-01 and 15-01 were all revision 0.

Our review was focused primarily on the compliance of your QA program with the requirements of the NRC QA Review Plan. We hereby approve the WMPO QAPP (Rev. 2), the twelve QMP's in Section II of the QAPP, the NNWSI QAP (Rev. 3) and the three SOP's submitted with the NNWSI QAP subject to incorporation of the comments provided in the attachment to this memorandum. All revisions to the WMPO QAPP, the NNWSI QAP, the WMPO QMP's and the NNWSI SOP's should be submitted to HQ for approval. Also, any new QMP's or SOP's should be submitted to HQ for approval.

If you have any questions, please contact Carl Newton on FTS 252-1248.



William J. Purcell  
Associate Director  
for Geologic Repositories  
Office of Civilian Radioactive  
Waste Management

Attachment: HQ Comments on WMPO QA Documents

## HQ Comments on WMPO QA Documents

1. WMPO QAP, Policy Section and Purpose and Scope - Importance to Safety and Waste Isolation

Although we are not requesting a change here, we wish to ensure that you are aware that program wide rationale and the process for identifying items and activities important to safety and waste isolation are being developed and Headquarters Guidance on how to accomplish these tasks will be issued in the near future. Your current QAP and Procedures, as well as the activities performed in accordance with them will need to be reviewed and possibly revised when this guidance is issued to assure compliance. A conservative interim approach is therefore recommended to preclude the necessity for increasing the QA level of any item or system and the rework that could entail.

2. QMP-03-01, Peer Review, Section 5.1.2

To ensure compliance with Appendix A, paragraph 3.8 of the NRC QA Review Plan concerning selection of qualified individuals to conduct peer reviews, this section should be revised to specify that the reviewers selected by the branch chief should not only be technically competent as stated but should also have expertise equivalent to those who performed the work.

3. WMPO QAPP, Section 17, QA Records

We were unable to review this section for compliance with specified requirements since QMP-17-01 was not included. Please submit QMP-17-01 to HQ for review and approval when developed.

4. NNWSI QMP-06-01 Paragraph 5.3.1

To avoid the potential of an inconsistency developing between QMP-06-01 and QMP-06-02, you should delete the approval requirements from paragraph 5.3.1 of QMP-06-01 since they are repeated in Paragraph 5.2.3 of QMP-06-02.

5. NNWSI QMP-06-01 Paragraph 5.5

You should delete the distribution requirements from paragraph 5.5 of QMP-06-01 and cover the material in paragraph 5.3 of QMP-06-02; we feel this is a more appropriate location.

6. NNWSI QMP-18-01 Paragraph 5.6

To aid Headquarters in monitoring of project QA activities please add a requirement to paragraph 5.6 of QMP-18-01 to supply copies of audit reports and their associated correspondence to DOE-HQ, OGR and to the HQ Technical Support Services Contractor (Weston).