

United States Government

Department of Energy

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WM Record File

WM Project

Docket No.

PDR

LPDR

Distribution:

M. Delaney, Kennedy, Bilhorn
B. Miller, Sem, LHedges
(Return to WM, 623-SS)

DATE: AUG 30 1985

REPLY TO
ATTN OF: RW-23SUBJECT: Proposed Change to OGR QA Plan - Addition of a Supplement Titled
"Program-Wide QA Requirements for Qualification of Personnel"TO: William Purcell, Associate Director
Office of Geologic Repositories

The attached proposed change to the OGR QA Plan, concerning QA requirements for qualification of personnel, was developed by the Quality Assurance Coordinating Group (QACG). The comments of the QACG members representing the four projects have been incorporated. We are now asking that you issue the document to the OGR projects for their formal review under our document baseline control procedures. Following the formal review by the projects, and resolution of any comments, the change will be issued under the baseline change control procedure, as a QA requirement in the HQ-OGR Quality Assurance Plan, OGR/B-3.

The basic need for this supplement to our QA Plan comes from the NRC QA Review Plan. The NRC QA Review Plan in section 2.8 of Appendix A sets forth five requirements for the indoctrination, training, and qualification of personnel, namely:

1. Personnel responsible for performing quality-related activities must be instructed as to the purpose, scope, and implementation of the quality-related manuals, instructions, and procedures.
2. Personnel verifying activities affecting quality must be qualified in the principles, techniques, and requirements of the activity being performed.
3. Documentation of formal training and qualification programs, must include the objective, content of the program, attendees, and date of attendance.
4. Appropriate management must monitor the performance of individuals involved in activities affecting quality and determine the need for retraining and/or replacement. A system of annual appraisal and evaluation can satisfy this criterion.
5. To be considered qualified to do quality related work, personnel must be certified in accordance with applicable codes and standards.

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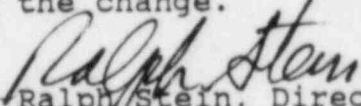
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The projects recognized the need for a common approach to meeting these NRC requirements; this supplement to our QA plan will meet this need.

I foresee that there would only be two areas where implementation of these new requirements would impact OGR. First, we will have to establish and implement a procedure on indoctrination and training of OGR personnel. Preparation of this procedure is well underway. The second impact is that the annual performance appraisals for personnel will have to be retained as permanent QA records. The impacts on the projects will be similar.

If you agree with the proposed change, please sign the attached Baseline Change Proposal form and return it to Carl Newton. He will send it to Martin Hanson of Weston for transmittal to the projects under the baseline control system. We would be happy to meet with you to discuss any questions on the change.


Ralph Stein, Director
Engineering and Licensing
Division

Attachment:
OGR Basline Change Proposal Form

OFFICE OF GEOLOGIC REPOSITORIES
PROGRAM
BASELINE CHANGE PROPOSAL

DATE: 8/9/85

SHEET 1 OF

BCP NUMBER B. _____

BCP TITLE Su-plemental QA Requirements

DOCUMENT NUMBER OGR/B-3

REVISION 0

DOCUMENT TITLE OGR QA Plan

ADDITION OF DOCUMENT ☐

CHANGE BASELINED DOCUMENT 

DESCRIPTION AND JUSTIFICATION FOR PROPOSED CHANGE: There is a need for consistency among the projects in qualifying personnel who perform and/or verify activities affecting the quality of items important to safety and/or waste isolation and in documenting the qualification of these personnel. Accordingly, we are proposing a supplement to be added to the OGR QA Plan to specify these requirements. This supplement has been reviewed by the Quality Assurance Coordinating Group members and their comments have been incorporated. The changes to be made to the OGR QA Plan are shown on the attached sheets.

Additional QA Requirements are being developed by the OGR QA Coordinating Group (QACG). The first of these is documented in Supplement No. 1

OTHER BASELINE DOCUMENTS AFFECTED:

None.

DETAILS OF IMPACT ACTIVITY/ITEM AFFECTED	COST IMPACT	SCHEDULE IMPACT

ORIGINATOR

NAME Carl Newton

ORGANIZATION OGR-HQ QA

PHONE 252-1248

SUBMITTED BY

SIGNATURE

PROJECT OGR

DATE _____

DISTRIBUTE FOR REVIEW TO:

CCB MEMBERS

ASSOCIATE DIRECTOR, OGR
PROJECT MANAGER, SRPO
PROJECT MANAGER, BWIPO
DIRECTOR, WMPO
PROJECT MANAGER, CPO

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III. APPLICABLE QUALITY ASSURANCE DOCUMENTS

A. U.S. Department of Energy

The DOE's QA requirements are defined in DOE Order 5700.6A which identifies ANSI/ASME NQA-1 as the preferred standard for quality assurance programs for nuclear projects.

B. Nuclear Regulatory Commission

The Nuclear Regulatory Commission's (NRC) QA requirements for site characterization of high-level waste repositories are contained in 10 CFR part 60, which specifies the Program Implementation criteria of Appendix B of 10 CFR 50.

C. Office of Geologic Repositories

HQ-OGR, its project offices, and their contractors shall develop, implement, and maintain a quality assurance program that complies with the basic and supplementary requirements of ANSI/ASME NQA-1, 1983, "Quality Assurance Requirements for Nuclear Facilities." All basic and supplementary requirements may not be applicable to every activity performed by HQ-OGR, Project Offices, and their contractors during siting and site characterization. However, rationale for exclusion of basic requirements is to be provided in the respective programs. Where a basic requirement is determined non-applicable, the supplement(s) for that requirement is/are also non-applicable.

D. Supplemental QA Requirements

Supplemental QA Requirements will be issued by OGR as part of this QA Plan as the need for them is identified. The supplemental requirements are to be complied with by HQ-OGR, Project Offices, and their contractors.

Supplement
No.

Title

1

Qualification of Personnel Performing and
Verifying Activities Affecting Quality

SUPPLEMENTAL QUALITY ASSURANCE REQUIREMENTS

QUALIFICATION OF PERSONNEL PERFORMING AND
VERIFYING ACTIVITIES AFFECTING QUALITY

1.0 SCOPE

These HQ/OGR requirements apply to all personnel who are assigned to perform and verify activities affecting quality.

1.1 QUALIFICATION REQUIREMENTS

Each OGR participating organization shall establish written procedures for the qualification of personnel and ensure that only those personnel who meet the minimum established qualification requirements are permitted to perform or verify activities that affect quality.

Minimum education and experience requirements shall be established and documented in job specific position descriptions or other suitable means as appropriate for the job to be performed.

In addition, personnel who verify the quality of items and activities through audits, inspections, tests, and nondestructive examinations shall be certified in accordance with the applicable supplementary requirements of NQA-1.

1.2 PERSONNEL SELECTION

Personnel selected for performing or verifying activities shall have education and experience commensurate with the minimum requirements specified for the job. The capabilities of an individual shall be based upon an evaluation of the candidate's education, experience, and training and compared to those established for the position.

1.3 INDOCTRINATION

Provisions shall be established for the indoctrination of personnel prior to assigning them to perform activities affecting quality. Emphasis shall be placed on the purpose, scope, and implementation requirements of the related manuals, procedures, and instructions. Those who verify activities affecting quality shall be instructed in the principles, techniques, technical objectives, and requirements of the activity being performed. Records of indoctrination shall be maintained and will include as a minimum, the objective and content of the session, instructor, attendees, and dates of attendance.

1.4 TRAINING

Suitable proficiency shall be maintained by establishing a formal training program. For those areas which require training, determination will be

made of: personnel required to attend; description of course content, instructor qualifications and frequency. The trainee's assimilation of the subject matter shall be determined through either examination or performance evaluation. Training records shall include the names of attendees, date of training, type of training, instructor's name and results of examination or performance evaluation.

On-the-job training may also be included in the program, with emphasis on hands-on experience gained through actual performance of activities.

1.5 PERFORMANCE EVALUATION

The job performance of personnel who perform or verify activities important to quality shall be evaluated at least annually. The evaluation shall determine whether adequate proficiency has been maintained. The evaluation shall also determine the need for retraining or replacement.

1.6 DOCUMENTATION OF QUALIFICATION

The qualification of personnel shall be documented on appropriate forms and include the following information:

- (a) Employer's name;
- (b) Name of person being qualified;
- (c) Activities qualified to perform;
- (d) Basis used for qualification, including such factors as:
 - (1) Education, experience, and training;
 - (2) Test results, where applicable;
 - (3) Results of capability demonstration;
- (e) Results of periodic evaluation;
- (f) Results of physical examination, when required;
- (g) Signature of employer's designated representative who is responsible for evaluation;
- (h) Date of qualification and date of expiration (where applicable).

The documentation of qualification shall be retained as permanent QA records.