



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 3, 1997

Ronald Gingerich, Director
Low-Level Radioactive Waste Program
Connecticut Hazardous Waste
Management Service
50 Columbus Boulevard
Hartford, CT 06106-1910

SUBJECT: REVIEW OF THE CONNECTICUT LOW-LEVEL RADIOACTIVE WASTE PROGRAM
QUALITY ASSURANCE PLAN

Dear Mr. Gingerich:

In response to your March 10, 1997, request, the staff reviewed your submittal entitled "Connecticut Low-Level Radioactive Waste Program Quality Assurance Plan." The staff did not conduct an in-depth review similar to the type of review that we conduct as part of the formal license application review. Instead, the staff initially conducted an "acceptance" review to determine if all the areas required in a Quality Assurance (QA) Plan were addressed. The acceptance review was based on reviewing and comparing the information in your Quality Assurance Plan (QAP) against the guidance identified in NUREG-1293 entitled "Quality Assurance Guidance for a Low-Level Radioactive Waste Disposal Facility," and Chapter 9, "Quality Assurance" of NUREG-1199, "Standard Format and Content of a license application for a Low-Level Radioactive Waste Disposal Facility." The staff concluded that the Connecticut QAP addressed all of the QA information recommendations.

Following the acceptance review, the staff reviewed your QAP to determine if it could identify any significant issues or concerns. This review was based on the guidance in NUREG-1293, and Chapter 9 of NUREG-1200, "Standard Review Plan for the Review of a License Application for a Low-Level Radioactive Waste Disposal Facility." The staff has identified two areas that it recommends be expanded, early on, in the development of your QAP.

First, the staff recommends that detailed implementing procedures be developed to support each of the 18 criteria identified in your QAP. The implementing procedures can either be developed by the your staff (CHWMS) or by your selected contractor. However, the group applying the QA criteria should develop the implementing procedures.

The implementing procedures serve four main functions: (1) they focus both your staff and supporting contractors on the necessary training to support the QAP criteria; (2) they provide a simple mechanism for making adjustments/corrective actions in the program while minimizing schedule and cost impacts; (3) they provide both your staff and supporting contractors a written standard to evaluate their own performance (self-assessment), and take corrective actions when necessary; and (4) they provide CHWMS a mechanism for conducting audits/inspections of the program to determine if the QAP is properly implemented. For example, if the result of an audit/inspection determines that the proper procedures and supporting revisions are being used

NW4
110

140022

NRC FILE CENTER COPY

R. Gingerich

-2-

and understood by the staff/contractor applying the procedures, CHWMS will have a high level of confidence in the QA program.

Finally, the staff recommends that CHWMS define early in the QA process when and where the QA criteria will be applied. Chapter 6, "Applicability of Quality Assurance" of the QAP recognizes the need to establish a QA program early in the facility development, and to define when and where the QAP should be applied. Considering the fact that work affecting the site characterization, performance, and safety of the facility may be performed prior to selecting the facility developer/operator, the staff cannot overemphasize the importance of defining early in the QA process when and where the QA criteria will be applied. Because of the way CHWMS responsibilities were established by the General Assembly, this area has the potential to be the biggest single weakness in the process. However, early definition of the application of the QAP will resolve this potential issue.

The review was conducted by Larry Pittiglio who was the author of the guidance documents addressed above. He can be reached (301) 415-6702, should you have any questions concerning these comments.

Sincerely,
[Original signed by]
John W. N. Hickey, Chief
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

TICKET: LLDP-7070

DISTRIBUTION: Central File
PSobel PLOhaus

LLDP r/f
PUBLIC

DWM r/f

NMSS r/f

JGreeves

MFederline

*SEE PREVIOUS CONCURRENCE

T. Johnson

Path & File Name: S:\DWM\LLDP\CLP\QA.CON

OFC	LLDP*		LLDP*		LLDP	N								
NAME	CPittiglio		RNelson		JHickey									
DATE	4/02/97		4/02/97		4/3/97									

OFFICIAL RECORD COPY

ACNW: YES ☒ NO ☐
IG : YES ☐ NO ☒
LSS : YES ☐ NO ☒

Category: Proprietary ☐ or CF Only ☐

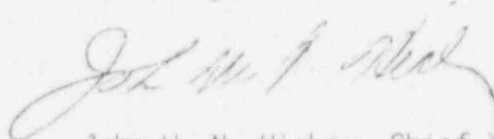
Delete file after distribution: Yes ☐ No ☒

and understood by the staff/contractor applying the procedures. CHWMS will have a high level of confidence in the QA program.

Finally, the staff recommends that CHWMS define early in the QA process when and where the QA criteria will be applied. Chapter 6, "Applicability of Quality Assurance" of the QAP recognizes the need to establish a QA program early in the facility development, and to define when and where the QAP should be applied. Considering the fact that work affecting the site characterization, performance, and safety of the facility may be performed prior to selecting the facility developer/operator, the staff cannot overemphasize the importance of defining early in the QA process when and where the QA criteria will be applied. Because of the way CHWMS responsibilities were established by the General Assembly, this area has the potential to be the biggest single weakness in the process. However, early definition of the application of the QAP will resolve this potential issue.

The review was conducted by Larry Pittiglio who was the author of the guidance documents addressed above. He can be reached (501) 415-6702, should you have any questions concerning these comments.

Sincerely,



John W. N. Hickey, Chief
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

and understood by the staff/contractor applying the procedures. CHWMS will have a high-level of confidence in the QA program.

Finally, the staff recommends that CHWMS define early in the QA process when and where the QA criteria will be applied. Chapter 6, "Applicability of Quality Assurance" of the QAP recognizes the need to establish a QA program early in the facility development, and to define when and where the QAP should be applied. Considering the fact that work effecting the site characterization, performance, and safety of the facility may be performed prior to selecting the facility developer/operator, the staff cannot over emphasize the importance of defining early in the QA process when and where the QA criteria will be applied. Because of the way CHWMS responsibilities were established by the General Assembly, this area has the potential to be the biggest single weakness in the process. However, early definition of the application of the QAP, will resolve this potential issue.

The review was conducted by Larry Pittiglio who was the author of the guidance documents addressed above. He can be reached (301) 415-6702, should you have any questions concerning these comments.

Sincerely,

[Original signed by]

John W. N. Hickey, Chief

Low-Level Waste and Decommissioning
Projects Branch

Division of Waste Management

Office of Nuclear Material Safety
and Safeguards

TICKET: LLDP-7070

DISTRIBUTION: Central File

LLDP r/f

DWM r/f

NMSS r/f

JGreeves

MFederline

PSobel

PLohaus

PUBLIC

To receive a copy of this document in small box on "OFC:" line enter: "C" = Copy without attachment/enclosure; "E" = Copy with attachment/enclosure; "N" = No copy

Path & File Name: S:\DWM\LLDP\CLP\QA.CON

OFC	LLDP	E	LLDP	LLDP															
NAME	CPittiglio		RNelson	JHickey															
DATE	4/2/97		4/2/97	1/97															

OFFICIAL RECORD COPY

ACNW: YES ☒ NO ☐

IG : YES ☐ NO ☒

LSS : YES ☐ NO ☒

Category: Proprietary ☐ or CF Only ☐

Delete file after distribution: Yes ☐ No ☒