Kenneth R. Hooks

U.S. Nuclear Regulatory Commission

Office of Nuclear Material Safety and Safeguards

Division of High-Level Waste Management

ESSENCE OF QA

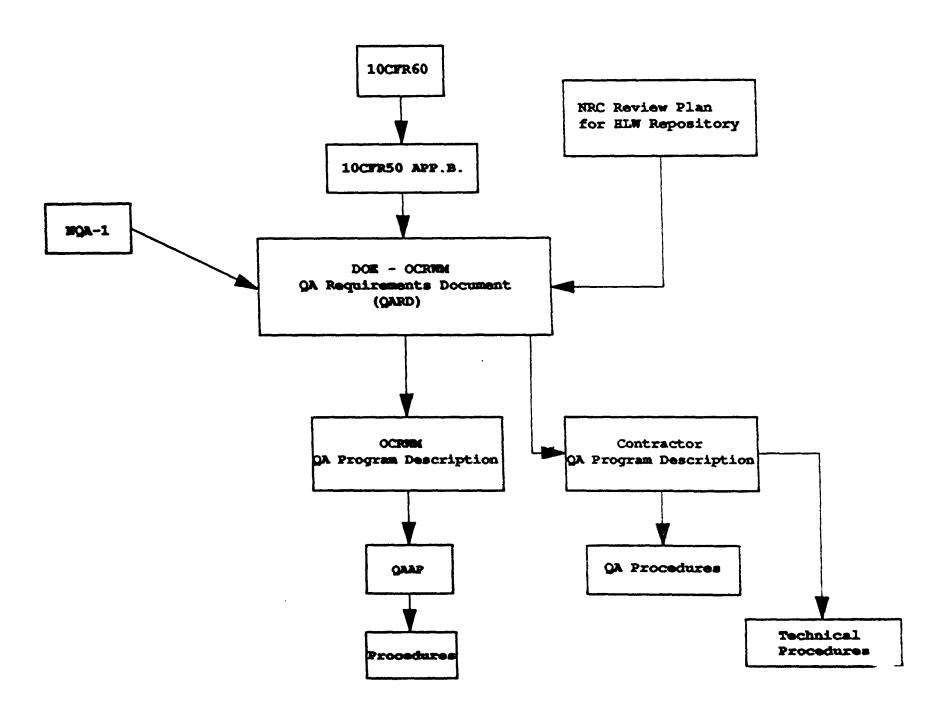
PLAN ACTIVITIES (AND DOCUMENT PLANNING PROCESS).

FOLLOW THE PLAN (AND DOCUMENT THE WORK PROCESS).

DOCUMENT RESULTS.

AUDIT TO VERIFY ADEQUACY OF ABOVE STEPS, AND DOCUMENT AUDITS.

HIERARCHY OF HLW QA PROGRAM



LEVELS OF SPECIFICITY IN QA REQUIREMENTS

10 CFR PART 60, SUBPART G

10 CFR PART 50, APPENDIX B

NRC REVIEW PLAN

NRC REQUIREMENTS

NUREGS

NQA-1

DOE REQUIREMENTS

OCRWM QAR

OCRWM QAPD

PARTICIPANT QAPP

YMPO QUALITY MANAGEMENT PROCEDURES

PARTICIPANT QA PROCEDURE(S)

PARTICIPANT TECHNICAL PROCEDURE(S)

SCIENTIFIC INVESTIGATION (ACTUAL WORK)

18 CRITERIA OF 10 CFR PART 50, APPENDIX B

- I. ORGANIZATION
- II QUALITY ASSURANCE PROGRAM
- III DESIGN CONTROL
- IV PROCUREMENT DOCUMENT CONTROL
- V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS
- VI. DOCUMENT CONTROL
- VII. CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES
- VIII.IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS

CONTINUED

CONTINUED

18 CRITERIA OF 10 CFR PART 50, APPENDIX B

- IX. CONTROL OF SPECIAL PROCESSES
- X. INSPECTION
- XI. TEST CONTROL
- XII. CONTROL OF MEASURING AND TEST EQUIPMENT
- XIII HANDLING, STORAGE AND SHIPPING
- XIV. INSPECTION, TEST, AND OPERATING STATUS
- XV. NONCONFORMING MATERIALS, PARTS, OR COMPONENTS
- XVI. CORRECTIVE ACTION
- XVII QUALITY ASSURANCE RECORDS
- XVIII. AUDITS

TRANSLATION OF 10 CFR PART 50, APPENDIX B REQUIREMENTS AS APPLIED TO SCIENTIFIC (FIELD) INVESTIGATIONS

CRITERION III, DESIGN CONTROL (FIELD CHANGES)

"DESIGN CHANGES, INCLUDING FIELD CHANGES, SHALL BE SUBJECT TO DESIGN CONTROL MEASURES COMMENSURATE WITH THOSE APPLIED TO THE ORIGINAL DESIGN AND BE APPROVED BY THE ORGANIZATION THAT PERFORMED THE ORIGINAL DESIGN UNLESS THE APPLICANT DESIGNATES ANOTHER RESPONSIBLE ORGANIZATION."

"NQA-1-1986, DESIGN CONTROL (FIELD CHANGES)

"DESIGN CHANGES, INCLUDING FIELD CHANGES, SHALL BE GOVERNED BY CONTROL MEASURES COMMENSURATE WITH THOSE APPLIED TO THE ORIGINAL DESIGN."

CONTINUED...

NNWSI/88-9, REV.2, SCIENTIFIC INVESTIGATION CONTROL AND DESIGN CONTROL

"1.6.1 DOCUMENTATION

THERE ARE TWO METHODS WHICH CAN BE USED FOR THE QUALITY ASSURANCE, DOCUMENTATION AND CONTROL OF SCIENTIFIC WORK. THESE ARE THE SCIENTIFIC NOTEBOOK SYSTEM AND THE TECHNICAL IMPLEMENTING PROCEDURE SYSTEM.

THE SCIENTIFIC NOTEBOOK SYSTEM WILL GENERALLY BE USED BY QUALIFIED INDIVIDUALS WHO ARE USING A HIGH DEGREE OF PROFESSIONAL JUDGEMENT, TRIAL AND ERROR METHODS, OR DEVELOPING
THE METHODOLOGY BY WHICH AN ACTIVITY WILL BE ACCOMPLISHED. WHEN THE SCIENTIFIC NOTEBOOK SYSTEM IS USED, THE STUDY PLAN OR SCIENTIFIC INVESTIGATION PLANNING DOCUMENT SHALL BE THE CONTROLLING DOCUMENT USED TO PERFORM THE ACTIVITY SINCE IT DESCRIBES THE PROPOSED APPROACH OR GENERAL PROCEDURE FOR ACCOMPLISHING THE WORK.

WHAT DOES THIS EXAMPLE SHOW

THERE IS A GENERAL REQUIREMENT IN 10 CFR PART 50, APPENDIX B, CRITERION III, FOR CONTROL OF DESIGN ACTIVITIES.

OCRWM QAPD SAYS SCIENTIFIC INVESTIGATIONS ARE DESIGN ACTIVITIES AND WILL BE CONTROLLED.

NNWSI/88-9 SAYS SCIENTIFIC NOTEBOOKS CAN BE USED FOR NON-REPETITIVE WORK REQUIRING A HIGH DEGREE OF PROFESSIONAL JUDGEMENT OR TRIAL AND ERROR METHODS. IN SUCH CASES, THE CONTROL IS PROVIDED BY THE STUDY PLAN OR SCIENTIFIC INVESTIGATION PLANNING DOCUMENT. USE OF DETAILED TECHNICAL PROCEDURES IS NOT REQUIRED.

NRC PERCEPTIONS OF QA

10 CFR PART 50, APPENDIX B QA PROGRAM CAN BE IMPLEMENTED ON EARTH SCIENCES, BASED ON EXPERIENCE WITH NUCLEAR POWER PLANT SITE INVESTIGATIONS. NRC QA REQUIREMENTS ARE SUFFICIENTLY GENERAL TO PERMIT ADEQUATE FLEXIBILITY IN SCIENTIFIC INVESTIGATIONS.

IMPLEMENTING PROCEDURES AT THE WORKING LEVEL ARE BEST DEFINED BY EXPERIENCED SCIENTISTS/ENGINEERS WHO UNDERSTAND THE INTENT OF QA REQUIREMENTS.

THE APPLICATION OF A MEANINGFUL QA PROGRAM TO ANY COMPLEX ACTIVITY WILL REQUIRE SUCCESSIVE ITERATIONS.

ABI:	PRESSES/REQUIRES	254	•								
	-MOT APPLICABLE -MO RESPONSIBILITY	1000	•		:	!		:	:	:	
	9 *** ********************************	war.	7500		:						
	APPENDIX B CRITERIA	QARD	QAPD	USGS	LLML	REECO	LANL	- TSN	SNL	BEN	CONTRA
I.	CREATIENTON	X	X	x	X	X	X	X	X	X	X
II.	QA PROGRAM	X	x	x	X	x	x	X	X	x	x
m.	DESCRICE CONTROL	x	X	X	X	0	X	X	X	ONLY ONLY	x
IV.	PROCURERET DOCUMENT CONTROL	x	x	x	x	x	x	X	x	PROCES.	TWOOMP, SMCT, FII
٧.	INSTRUCTIONS, PROCEDURES & DRAWINGS	x	x	X	x	x	x	x	x	X	. X
WI.	DOCUMENT CONTROL	x	x	x	x	X	x	X	X	x	x
VII.	CONTROL OF PURCHASED MAT., EQUIP. & SERV.	X	x	X	x	x	x	X	X	PROCUR,	, x
WIII.	IDENT. & CONTROL OF MAT., PARTS & COMP.	X	X	X	X	X	X	ITEM OFFI	x	x	x
IX.	CONTROL OF SPECIAL PROCESSES	X	na	NA	x	x	X	x	x	x	. x
x.	IMMPECTION	X	NA	NA	x	x	NA	, x ,	x .	x	KA
x.	TEST CONTROL	X	NA	NA	x	. X	NA	<u> </u>	X	. x .	, XX
XII.	COMPROL OF MEASURING & TEST EQUIPMENT	X	X	X	x	x	X	, x	x	×	x
XIII.	MANDLING, STORAGE AND SKIPPING	*	X	X	x	,,,,,,,,,, x	x	, x	X	, x	, x
XIA.	IMMUNICATION, TEST, AND OPERATING STATUS	x	NA	NA	X	X	NA	., NA	x	x	NA
XV.	MONCOMPOSITING MATERIALS, PARTS OR COMPONENTS	X	X	X	X	. X	X	. X	X	X	, X
XVI.	COMMUNITYE ACTION	X	X	X	X	X	X	<u>.</u> x	X	x	x
	QUALITY ASSURANCE PECCEDS	X	X	X	X	·	X	<u>.</u> X	X	X	, X
	AUDITE	X	X		X	*********		x		x	
	COMPUTER SCHIMARE	:	:	:			:		APP-H	•	
XX.	SCHENTIFIC INVENTIGATIONS	APP-A	APP-A	80EC. 3	SEC. 3	. 0	SEC. 3	SEC. 3	SEC. 3	NA	

KET:

DRESSES/RECUIRES