

Solving Cleanup Challenges Through Risk Reduction

**NATIONAL SPENT NUCLEAR FUEL
PROGRAM
SEMI-ANNUAL STRATEGY MEETING**

EM Office of Standards and Quality Assurance

**Washington, DC
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EM *Environmental Management*

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Key Discussion Topics:

- **EM Organization**
- **RW/EM Flowdown**
- **EM/Sites Flowdown**
- **Use Of Qualified Data**
- **10 CFR Part 21 Discussion**

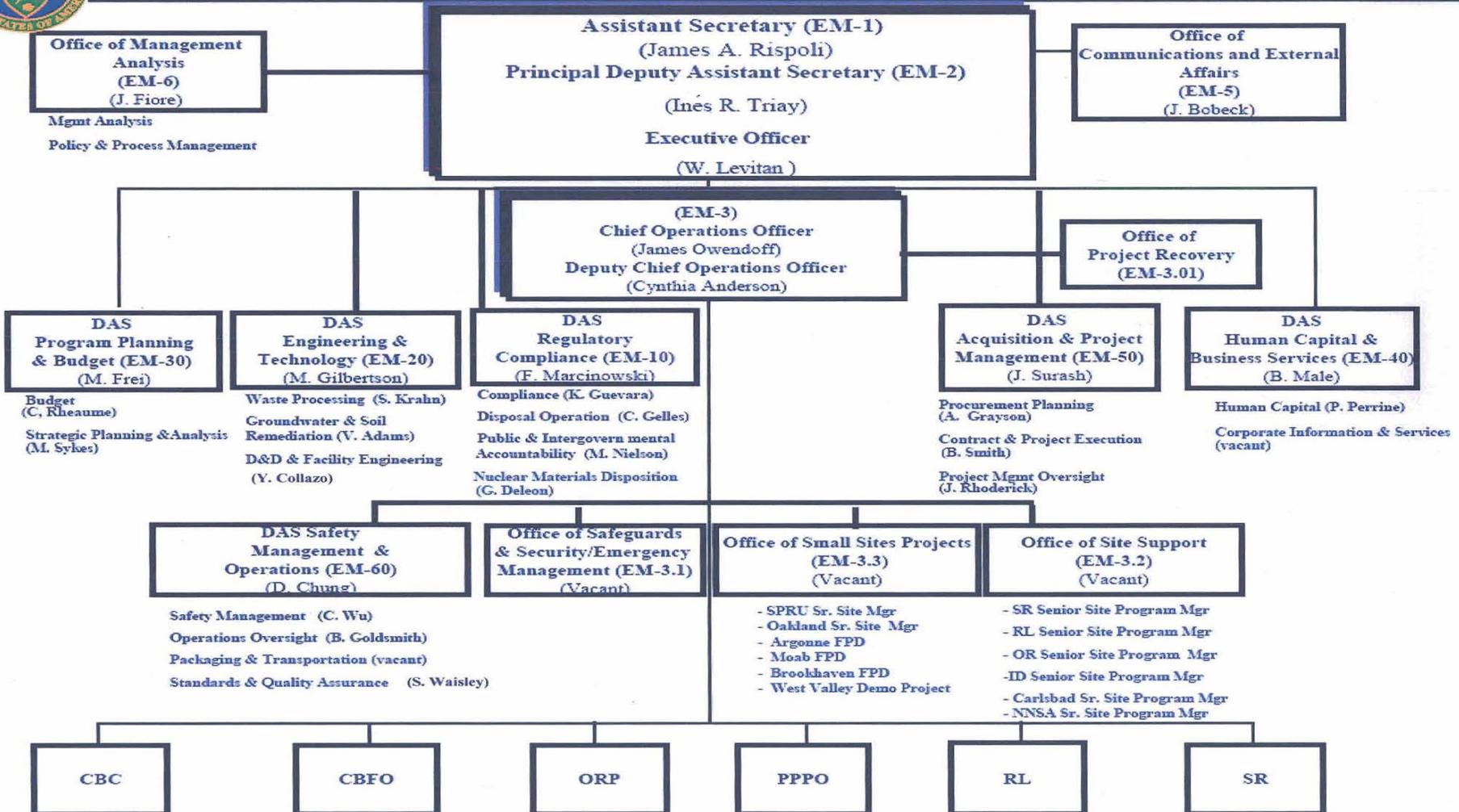


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2/4/08



Office of Environmental Management



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RW/EM FLOWDOWN

- **SNF/HLW MOA:**

- **Purpose:** This MOA establishes the terms and conditions under which RW will make available disposal services to EM for its SNF and HLW.
- **Scope:** This MOA applies to the acceptance of EM SNF and HLW from EM by RW, and the responsibilities of EM and RW relative to the acceptance, transportation, and disposal of these materials.
- **Acceptance Planning:**
 - SNF – EM shall provide data, suitable for their intended use in accordance with applicable QA requirements.
 - HLW – EM shall provide initial compliance documents (WCP, WQR, Production Records) for all planned HLW production sites for review and concurrence by RW prior to initial issuance.



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EM/SITES FLOWDOWN

SNF/HLW MOA:

Policy: EM will include QARD and WASRD requirements in contacts defining applicable work scope, goods, and services performed by principal contractors at Federal waste custodian sites.

EM QA Responsibilities: EM is responsible for ensuring the flow down of appropriate QA requirements to contractors performing work subject to the QARD, including applicable contractual documents (QARD and WASRD).

The EM to Sites flow down is normally via a memorandum from EM-10 for technical requirements, and EM-60 for QA requirements.

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USE OF QUALIFIED DATA

- **QARD, Section 3.2.1:**
 - **Design Input Control:**
 - **Data from scientific investigation activities used as design input shall be qualified IAW Supp. III, *Scientific Investigation*.**
 - **If not qualified prior to use in a design product, it shall be identified as such and tracked until qualified.**
 - **Unqualified data directly relied on to address safety or waste-isolation issues shall be qualified or it shall not be used in the license application.**



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USE OF QUALIFIED DATA (CONTINUED)

- **QARD, SUPP. III.2.4.C:**
 - **Methods available to qualify data are:**
 - Determine that Data was developed under equivalent QA requirements to the QARD
 - Evaluation of corroborating data
 - Confirmatory testing
 - Peer review IAW QARD, Sec 2
 - Technical assessment to independently evaluate data



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10 CFR PART 21 – Discussion

- **SNF/HLW MOA:**
 - **EM QA Responsibilities:** EM shall comply with 10 CFR 21, *Reporting of Defects and Noncompliance*, for those basic components to be used or accepted at an RW facility.
 - **10 CFR Part 21, Purpose & Scope:** ... requires any individual director or responsible officer of a firm constructing, owning, operating or supplying the components of any facility or activity **which is licensed**... to report substantial safety hazards, failures and defects to the NRC.
 - Open for discussion is RW's expectation on how EM is to comply with 10 CFR Part 21 since EM is not the licensee for SNF and HLW disposal.

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