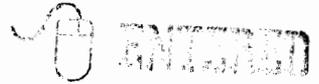


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Westinghouse
Electric Corporation

Advanced Power Systems
Divisions

Waste Technology Services Division
WIPP Project

Box 2078
Carlsbad NM 88221

October 3, 1986

Mr. D. E. Bishop
Quality Assurance Manager
U. S. Department of Energy
WIPP Project
P. O. Box 3090
Carlsbad, New Mexico 88221

Subject: Q.A. Plan for 40 CFR191 Activities

Reference: WIPP:RES 86-1408, D. E. Bishop, WPO/QA to T. Miller, W/QA, "Q.A. Plan for Performance Assessment Activities", dated September 17, 1986.

Dear Mr. Bishop:

The purpose of this letter is to respond to the subject request for information pertaining to a Quality Assurance Plan for "Westinghouse responsibilities for Performance Assessment (P.A.)", as outlined in the referenced memo.

It should be clarified that as referenced in Memo 86-1179, Westinghouse no longer has responsibility for the Performance Assessment portions of 40 CFR191.

Westinghouse responsibility, as defined by Memo 86-1179 includes assuring compliance with Subpart A and Section 191.14 of Subpart B.

The following information summarizes the concept and status of QA documentation for the 40 CFR191 compliance activities for which Westinghouse has responsibility.

1. The controlling Quality Assurance document for all Westinghouse/WIPP activities is the WIPP Quality Program Manual (6/23/86) which defines, delineates and implements the WIPP Quality Program. This manual is supported by implementing procedures prepared by other departments engaged in quality-related work. This manual is presently in use at the WIPP.
2. The WEC WIPP Procedures Manual (9/15/86) contains the procedures used by the departments in implementing the Quality Program. This manual is presently in use at the WIPP, and is revised as needed to assure that any new quality related work is properly implemented in accordance with the controlled procedures.
3. For the work related to evaluating compliance with Subpart A of 40 CFR 191, the following plans, procedures and instructions have been or will be prepared by Technology Development Department, and will include appropriate Quality Assurance requirements:

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- a. The 40 CFR 191 Compliance Plan for the Waste Isolation Pilot Plant, WP-02-1 (5/14/86), defines the approach for demonstrating compliance with Subpart A. This plan is presently in review by DOE.
 - b. The Operational Radiological Monitoring Program Plan and Dose Assessment Program Plan will be issued as an integral part of the Environmental Program Plan. The ORMP defines the Operational Effluent Monitoring Program. The Dose Assessment Program will provide details for assuring compliance with Radiation Dose Criteria. These plans will be prepared and in place by 7/88 or approximately 90 days prior to receipt of waste.
 - c. The WIPP Procedure WP-02-301 - Radiological Environmental Surveillance Implementation defines and delineates the programmatic responsibilities for performance of Radiological Environmental Surveillance. This procedure is presently being prepared and will be in place by December, 1986.
 - d. Field Instructions for radiological effluent monitoring (WPO2-301-xx) which will describe the detailed steps for radiological effluent monitoring at the WIPP. These instructions will be prepared and in place at least 90 days prior to receipt of wastes.
4. For the work related to demonstrating compliance with the assurance requirements (post-closure plans for active and passive institutional control, post-closure monitoring plans, and resource assessments), the following plans and procedures have been or will be prepared:
- a. The 40 CFR 191 Compliance Plan for the Waste Isolation Pilot Plant, WP-02-1 (5/14/86) describes the approach to developing documentation supporting compliance with the assurance requirements of Subpart B. This plan is presently in review by DOE.
 - b. The WIPP Procedure WP-02-1XX - 40 CFR 191 Assurance Plans, containing procedures for developing plans and documentation for demonstrating compliance with the assurance requirements. This procedure will be prepared and in place by 7/88.

With respect to DOE/WPO Memo 86-0587, addressed in the reference, it should be noted that three of the major items, i.e. interface of Westinghouse QA and P.A. working groups, W/QA as part of the P.A. organization, and the mechanism for reporting, are no longer applicable to Westinghouse activities.

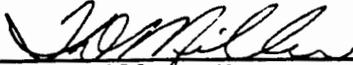
Westinghouse Q.A. review of the aforementioned procedures, as established by Section II of the Quality Program Manual, will provide adequate assurance that appropriate verification measures are established, as necessary, to evidence compliance with 40 CFR191, Subpart "A" and applicable Subpart "B" requirements.

The above documentation constitutes the required detailed and comprehensive QA documentation requested by WPO/QA.

D. E. Bishop
October 3, 1986
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Westinghouse Q.A. will schedule a meeting, at your convenience, should you have questions regarding the information submitted above.

Any questions regarding this letter may be directed to W. H. Sword or myself.



T. D. Miller, Manager
Westinghouse Quality Assurance

TDM/WHS/vlb

cc: J. Tillman, DOE R. Kehrman, WEC
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