

TITLE:

# NYE COUNTY NUCLEAR WASTE REPOSITORY PROJECT OFFICE

# QUALITY ADMINISTRATIVE PROCEDURE

<b>Records Management</b>		DATE: 11-15-07 Page 1 of 11
PROCEDURE NUMBER: QAP-17.1	SUPERSEDES: Revision 2, 3-31-04	
APPROVAL	CONCURRENCE	<u>المرین الملاحم</u> epresentative Date
Project Manager Date	Quality Assurance Offic	er 11/27/07 Date

# 1.0 PURPOSE

This quality administrative procedure (QAP) describes Nye County Nuclear Waste Repository Project Office (NWRPO) requirements and responsibilities for managing quality assurance (QA) records generated during NWRPO technical programs. It also provides guidance regarding the identification, submittal, and retention of documents for inclusion to the Licensing Support Network (LSN).

# 2.0 APPLICABILITY

This QAP applies to the management of all records generated from quality-affecting NWRPO technical program activities.

This QAP also applies to "documentary materials" as defined in 10 CFR, Part 2, Subpart J "Procedures Applicable to Proceedings for Issuance of Licenses for the Receipt of High-Level Radioactive Waste at a Geologic Repository."

# 3.0 DEFINITIONS

- **3.1** *Circulated Draft* A nonfinal document circulated for supervisory concurrence or signature in which the original author or others in the concurrence process have non-concurred and which may or may not eventually become a finalized document.
- **3.2** *Documentary Materials* Documents required for inclusion in the LSN. Attachment 1 provides a list of LSN documentary material record types.
- **3.3** *Licensing Support Network (LSN)* A web-based information system intended to support the U.S. Nuclear Regulatory Commission's (NRC) licensing process for a repository at Yucca Mountain, Nevada.
- **3.4** *Metadata*—information about the location, nature, use, and limitations of a data set.
- **3.5** *Quality administrative procedure*—a procedure developed to implement the QA requirements described in the QA Program Plan (QAPP).
- **3.6** *Quality Assurance Program Plan*—the controlled plan that outlines the NWRPO QA requirements, which are based principally on the applicable portions of the requirements set forth by the U.S. Nuclear Regulatory Commission and the American National Standards Institute for nuclear power plants, as adapted for a nuclear waste repository.
- **3.7** *Record*—documentation generated from technical activity.
- **3.8** *Record index designator (RID)*—a unique, sequential identification number associated with an individual NWRPO QA record or records package.
- **3.9** *Records package*—two or more records concerning a single topic.

#### 4.0 **RESPONSIBILITIES**

#### 4.1 Project Manager

The Project Manager (PM) or designee is responsible for developing a documentation system to control the identification, generation, validation, classification, filing, and storage of QA records, as well as approving this QAP.

#### 4.2 Quality Assurance Officer

The QA Officer (QAO) is responsible for identifying QA records in QAPs and reviewing, monitoring, and auditing QA records to ensure that they meet the requirements specified in this QAP.

## 4.3 On-Site Geotechnical Representative

The On-Site Geotechnical Representative (OSGR) or designee is responsible for ensuring that QA records and associated metadata are reviewed for technical accuracy and that any

changes from the review are incorporated before the records are submitted to the QA records center (QARC). In addition, the OSGR or designee is responsible for determining whether a record or records package shall be posted to the NWRPO website. The OSGR or designee, with the Principal Investigator (PI), is responsible for identifying QA records in work plans, test plans, and technical procedures, and for determining whether a record qualifies as documentary material for inclusion to the LSN (Attachment 1).

#### 4.4 **Principal Investigator**

The PI is responsible for generating and submitting QA records in a timely manner, maintaining custody of all data and related QA records until they are submitted to the QARC and accepted by the QA records specialist (QARS), and preparing appropriate metadata and submitting it with each record or records package. The PI, with the OSGR or designee is responsible for identifying QA records in work plans, test plans, and technical procedures.

The PI, or record transmitter, with the OSGR or designee, is required to designate on the transmittal form whether the submitted record is LSN-relevant, i.e., that it qualifies as documentary material (Attachment 1). The PI is also required to mark appropriately, and identify on the Record Transmittal Form, all submitted documents that may be privileged and submit a LSN Privileged Document Transmittal Attachment (Attachment 2).

# 4.5 Quality Assurance Records Specialist

The QARS is responsible for processing QA records, which includes receiving and verifying records, assigning RID numbers, proofreading and correcting minor errors in metadata as necessary, entering records and metadata into the QA database, filing and retrieving records from the project files, and controlling access to records.

The QARS is responsible for reviewing all documents submitted to the QARC, for transmitting records for posting on the nyecounty.com website, and for processing electronic copies, as appropriate, for inclusion on the LSN.

# 5.0 PROCESS

#### 5.1 Quality Assurance Record Generation

Records that document evidence of quality-affecting activities performed by NWRPO personnel shall be considered QA records. In most cases, QA records generated by NWRPO personnel shall consist of data and associated documentation specified in applicable QA plans and procedures. QA records may also be received from external sources.

#### 5.2 Review of Record Prior to Transmittal

Before transmitting QA records to the QARC, NWRPO personnel who generate or review QA records shall ensure that the records meet the following criteria:

- Records are relevant to NWRPO technical activities.
- Records are legible, reproducible, and of durable material that can be preserved.
- The Record Transmittal Form (Attachment 3) is attached to each record.
- Transmittal forms are signed and dated by the transmitter, the responsible PI or designee, and the QARS.
- Scientific notebooks or forms and related field records are signed and dated, as required.
- All supporting data are included with the submittal or, if previously submitted to the QARC, referenced on the Record Transmittal Form.
- Metadata associated with the record are described fully on the Record Transmittal Form for review by the OSGR or designee.

#### 5.3 Record Transmittal

QA records shall be transmitted to the QARC as soon as feasible after generation or receipt, or as specified in the appropriate QA plan or procedure, using the Record Transmittal Form. Whenever possible, electronic files should be submitted.

#### 5.4 Record Processing

5.4.1 Quality Assurance Records Specialist

Within one month of receiving a QA record, the QARS shall perform the following activities:

- Review the record to verify that it is acceptable according to the criteria specified in Section 5.2.
- If the record is unacceptable, contact the transmitter and request that the deficiency be corrected until the record is acceptable. The QARS may correct grammar and spelling errors in metadata without contacting the transmitter.
- Stamp the accepted record with the red QA Record Stamp in the lower right corner of the document (Attachment 4).
  - Assign a RID number and hand-print it on the QA Record Stamp (Attachment 4).
- Enter the Record Transmittal Form information and RID number into the QA database. Verify data entry by having an individual other than the QARS compare the transmittal form with a printout from the database.
- File the record in the project files.
- If authorized by the OSGR or designee, transmit the record for posting on the Nye County website, and if appropriate, process electronic files for inclusion to the LSN.

#### 5.4.2 On-Site Geotechnical Representative

Before the QARS enters the data from the Record Transmittal Form into the QA database, the OSGR or designee shall review the metadata. If the metadata are not

acceptable, the OSGR or designee shall correct the deficiency, or request that the transmitter do so, until the metadata are acceptable.

#### 5.5 Record Storage and Preservation

QA records shall be stored in clearly identified fire-resistant metal file cabinets protected from excessive moisture, heat, or pressure. Records shall be secured in binders, folders, or envelopes. Sensitive records, such as film negatives or electronic media, shall be stored appropriately.

If a record is damaged, it shall be restored as exactly as possible, signed and dated by the restorer, and submitted to the QARC for processing. The statement "Restored from the attached original" shall be displayed on each restored page of the record, and the damaged record shall be attached.

If a record is lost, it shall be identified as such by the responsible PI. The PI shall describe the lost record as accurately as possible, including its possible relationship to any associated records, and submit the description to the QARS for processing.

#### 5.6 Record Access and Retrieval

Direct access to NWRPO QA records shall be limited to the PM or designee, QAO, OSGR or designee, and QARS.

Other individuals may review records in the QARC or submit a written request for a copy of a record, indicating the title, category, date, or other information that will assist in retrieval of the record. All requests shall be processed by the QARS, who shall photocopy the record for the requester and return the record to the project files. For large documents or photographic or electronic media, special arrangements for reproduction shall be made. In no case shall QA records be removed from the QARC without documented QARS approval.

# 5.7 Record Revision

If revisions to a record are deemed necessary by the OSGR or designee, the record shall be revised as follows:

- Minor changes to metadata or scientific notebooks or forms shall be made by drawing a single line through incorrect information with black ink, printing the correct information, and initialing and dating the correction.
- For extensive revisions to metadata on a Record Transmittal Form, a new form shall be submitted to the QARC with a check mark in the "Revised" box at the top of the form.
- For changes to electronic files or data posted on the web, the record shall be superseded and a new record or records package submitted to the QARC. The new Record Transmittal Form shall include a brief description of the required changes and

the superseded RID number, and all pertinent records, records packages, and/or documentation shall be preserved in the QARC.

# 6.0 RECORDS

Documents generated by this QAP are QA records and shall be submitted to the QARC by the responsible individual. Prior to submittal, the QAO shall ensure that each document is complete, legible, and adequately identifiable, as specified in QAP-17.1, *Records Management*.

QA records generated by this QAP include the following:

- Record Transmittal Forms.
- The QA database.
- New records or record packages, including revised or corrected data.

# 7.0 REFERENCES

- 10 CFR Part 2, Subpart J, Procedures Applicable to Proceedings for the Issuance of Licenses for the Receipt of High-Level Radioactive Waste at a Geologic Repository.
- NRC Regulatory Guide 3.69, Rev.1, *Topical Guidelines for the Licensing Support Network*.

QAPP, Nye County Nuclear Waste Repository Project Office Quality Assurance Program Plan.

# 8.0 ATTACHMENTS

Attachment 1 LSN Documentary Material Record Types

Attachment 2 LSN Privileged Document Transmittal Attachment

Attachment 3 Record Transmittal Form

Attachment 4 Record Validation Stamp

# Attachment 1 LSN Documentary Material Record Types

Type of QARC Record	NWRPO WEBSITE	NWRPO LSN
DATA RECORDS		
Field Documents		,
Field Scientific Notebooks		
Borehole locations - GPS Site Surveys		
Well Completion Data		
Well Completion Diagrams		
Wellhead Protection Details		
Westbay MP Casing Summary Logs	$\checkmark$	$\checkmark$
Summary of Measured MP Measurement Port Depths	$\checkmark$	
Geologic Data		
Core Sample Log, Alluvium Core Logging Forms	$\checkmark$	
Cuttings Sample Logs, Alluvium & Non-Alluvium (Drill Cuttings) Logging Forms	$\checkmark$	$\checkmark$
Summary Lithologic Logs		
Geologic Cross Sections	$\checkmark$	
Lab Data		
Magnetic Susceptibility Data from EWDP Drill Cuttings		
SEM & Electron Microprobe Data		
Geochronology - U-TH Dating of Uranium in NC-EWDP-3D Cuttings		
Water Production Data		
Transfer of Custody Forms / Chain of Custody for geologic samples		
List of samples stored at the DOE Sample Management Facility (SMF)		
Geophysical Data		
Geophysical Logs	$\checkmark$	
Water Data		
EWDP Manual Water Level Data	$\checkmark$	
Private Wells Manual Water Levels		
Original Westbay Pressure and Temperature Data (raw data)		
Westbay Water Elevation and Temperature Data (processed data)		
Transfer of Custody / Chain of Custody - groundwater samples to lab		$\checkmark$
Water Geochemistry Laboratory Test Data		
Aquifer (Pump) Tests		
Pump Test Data (raw and processed)		
Spinner Tests (geophysical logs)		
Slug Test Data		
Gas Sampling		
Analytical reports (CFC)		
Gas Sampling Flow Sheets		
Gas Sampling Data Packet (procedures, equipment manuals, lab information, chain of custody to lab, results, correspondence, reports)		$\checkmark$

Type of QARC Record	NWRPO WEBSITE	NWRPO LSN
DOCUMENT RECORDS		
NWRPO Reports		
Annual and Drilling Phase Reports	$\checkmark$	$\checkmark$
Pump Test and Pump Spinner Test Reports		$\checkmark$
NWRPO Professional Papers, Presentations, Conference Paper Abstracts		$\checkmark$
Meeting, Technical Exchange, and Conference Comments		$\checkmark$
Document Reviews		$\checkmark$
NWRPO Plans and Procedures		$\checkmark$
Quality Assurance Program Plan		$\checkmark$
Quality Administration Procedures		$\checkmark$
Work Plans		$\checkmark$
Test Plans		$\checkmark$
Technical Procedures		
Audits, Surveillances, NCRs, Misc. Issues, Corrective Actions		

# Attachment 2 LSN PRIVILEGED DOCUMENT TRANSMITTAL ATTACHMENT

Transmitter Name:

Date Transmitted:

The attached document is subject to the following privileges (mark all that apply):

- \_\_\_\_\_ Attorney-client communication
- \_\_\_\_\_ Litigation work product
- \_\_\_\_\_ Deliberative process
- \_\_\_\_\_ Protected Personal Privacy Information (PII)
- \_\_\_\_\_ Other privacy information
- \_\_\_\_\_ Proprietary privilege
- \_\_\_\_\_ Safeguards Information (SGI)
- \_\_\_\_\_ Other security privilege (OUO, UCNI, etc.)
- \_\_\_\_\_ Archaeological privilege

# Attachment 3 Record Transmittal Form

Form QAP-17.1 Rev 1 10-31-07

Nye County Nuclear Waste Repository Project Office RECORD TRANSMITTAL FORM		RID Number			
Transmitter Information				REVISED RECORD	
Name		Date Transmitted			
Title		Organization	6		
Number of Records		Post to Website:  Yes	] No		
Privileged: 🗌 Yes 🗌 No		LSN-Relevant: DYes	] No		
Record Information			8- 1		
Date		Revision or Version (if applie	cable)		
Title					
Author		Author Organization			
Type (e.g., data, memo, map, CI	)				
Description	V				
Keyword 1	Keyword 2		Keyword 3		
Metadata Information	U				
Data Collection Method					
Data Collection Location					
Data Source(s)					
Supporting Data					
Data Censored					
Data Processing					
Data Limitations					
Period(s)	Governing QA	A Procedure or Plan			
Transmittal Frequency	Direct Questic	ons Concerning Data To			
Transmitter	!				
Signature				Date	
Principal Investigator					
Signature				Date	
QA Records Specialist					
Signature				Date	

## Attachment 4 **Record Stamp**

**QUALITY ASSURANCE RECORD** MAR 20 2004 THIS IS A RED STAMP **DO NOT REMOVE FROM FILE** 2020 🔶

**RID Number**