



National Spent Nuclear Fuel Program

Document Title:

NSNFP QARD Requirements Matrix

Doc. No.: DOE/SNF/MTX-001
Revision: 16
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Date: 2/19/2010

10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142 (b) Organization	QARD Section 1.0 Organization QARD Section 1.2 Requirements QARD Section 1.2.1 Responsibility for Quality	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan NSNFP 2.08, Verification of Personnel Experience NSNFP 16.04, Stop Work	Comment: NSNFP elects to continue verification of personnel experience.
10 CFR 63.142 (b) Organization	QARD Section 1.2.2 Resolution of Quality Disputes	NSNFP 1.03, Resolution of Quality Disputes	Exception: The NSNFP 1.03 Resolution of Quality Disputes provides a resolution path regardless of job functions of the NSNFP entities in disagreement. Justification: QARD Section 1.2.2 limits the process to disputes between line organizations and the QA organization. The NSNFP process envelops the QARD requirement and expands it to address disputes contained within an organization.
10 CFR 63.142 (b) Organization	QARD Section 1.3 Description QARD Section 1.3.1 Specific OCRWM Offices	Not applicable	Exception: The sections do not apply to NSNFP Justification: These QARD sections are specific to the OCRWM organizations and are amended by QARD Appendix A.
10 CFR 63.142 (b) Organization	QARD Section 1.3.2 Delegation of Authority	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan	Comment The RW/EM Memorandum of Agreement Rev. 2 and QARD Appendix A, "Waste Custodians" establish the interface between OCRWM and EM including NSNFP.



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142 (b) Organization	QARD Section 1.3.3 Principal Contractors	Not applicable	Exception: This section is not applicable to NSNFP. Justification: NSNFP is a DOE-ID program supporting EM. NSNFP does not oversee OCRWM principal contractors.
10 CFR 63.142 (b) Organization	QARD Section 1.3.4 Waste Custodians (Spent Nuclear Fuel and High-Level Waste Form Producers)	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan	None



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.0 Quality Assurance Program QARD Sections 2.2.1 A & B Quality Assurance Program Documents	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan NSNFP Documents Manual Introduction and Glossary NSNFP 2.07, Preparing the NSNFP Quality Assurance Program Plan and QARD Requirements Matrix NSNFP 5.01, Preparing Draft Procedures NSNFP 6.01, Review and Approval of NSNFP Internal Documents NSNFP 6.04, Review of External Documents	Comment: The NSNFP Policy Statement appears in DOE/SNF/QAPP-001.



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.1 C Quality Assurance Program Documents	NSNFP 2.07, Preparing the NSNFP Quality Assurance Program Plan and DOE/SNF/MTX-001, NSNFP QARD Requirements Matrix	Comment The NSNFP QARD Requirements Matrix includes applicable sections of 10 CFR 63.142 for general reference only. The text of the QARD drives the content of NSNFP QA program implementing documents.



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.2 Quality Assurance Program Applicability and Related Activities	NSNFP 2.05 Planning/Quality Assurance Program Applicability Evaluations	None.
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.3 Classifying Structures, Systems, And Components	Not Applicable NSNFP 2.05 Planning/Quality Assurance Program Applicability Evaluations	<p>Exception: Development of a Q-List does not apply to NSNFP</p> <p>Justification: Because repository systems, structures, and components (SSCs) important to safety or waste isolation, barriers important to waste isolation, and consumables important to safety or waste isolation are determined by the license applicant or licensee, NSNFP does not generate a Q-list. NSNFP does not design, procure, or operate facilities; or design or procure components of facilities or activities such as storage and transportation subject to NRC licensing. The suitability for use of information processed or provided by NSNFP is determined by the end user (the license applicant's designated designer).</p> <p>Comment: QARD Appendix A paragraph A.2.3 B.2.b discusses a list of activities. The aggregate output of NSNFP 2.05 (multiple evaluations) is equivalent to a singular listing of activities that are subject to the NSNFP QA program.</p>



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.4 Planning Work	NSNFP 2.05 Planning/Quality Assurance Program Applicability Evaluations NSNFP 3.03, Engineering Analysis NSNFP 5.01, Preparing Draft Procedures NSNFP 5.05, Developing Forms NSNFP 11.01, Testing	None.
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.5 Surveillances	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan NSNFP 18.01, Planning and Scheduling Assessments NSNFP 18.03, Administration and Conduct of Surveillances	None.
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.6 Management Assessments	Not Applicable	Exception: QARD section 2.2.6 does not apply to NSNFP. Justification: Management Assessment as described by QARD section 2.2.6 is an activity performed by OCRWM.
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.7 Readiness Reviews	Not applicable	Exception: QARD section 2.2.7 does not apply to NSNFP Justification: Readiness reviews are performed for facilities or field programs and are not applicable to the functions performed by the NSNFP.
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.8 Peer Reviews	Not applicable	Exception: QARD Section 2.2.8 does not apply to NSNFP Justification: The performance of peer reviews is not an anticipated function of the NSNFP. If a peer review is required, a NSNFP procedure will be developed.



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.9 Expert Elicitation	Not applicable	Exception QARD Section 2.2.9 does not apply to NSNFP Justification: Expert elicitation is not anticipated as activity to be performed by NSNFP.
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.10 Quality Assurance Program Self Assessments	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan NSNFP 2.09, Self-Assessment NSNFP 16.03, Quality Assurance Trending NSNFP 18.02, Administration and Conduct of Audits NSNFP 18.03, Administration and Conduct of Surveillances	Exception: The use of processes described by NSNFP 2.09, Self-Assessment is not mandatory for NSNFP activities that are subject to 10 CFR 63.142. Justification: QARD Section 2.2.10 is implemented through the performance of QA program audits, surveillances, and trend analysis for NSNFP activities subject to 10 CFR 63.142.



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142 (c) Quality assurance program	QARD Section 2.2.11 Personnel Indoctrination, Training, Qualification, and Certification	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan NSNFP 2.04, Personnel Indoctrination and Proficiency Training NSNFP 2.08, Verification of Personnel Experience NSNFP 6.01, Review and Approval of NSNFP Internal Documents NSNFP 18.04, Qualification of Audit Personnel	<p>Exception: Training and Qualification requirements for Inspection, Nondestructive Examination, and Test personnel are not applicable to NSNFP personnel.</p> <p>Justification: The direct performance of Inspection, Nondestructive Examination, or Test personnel activities by NSNFP is not anticipated. Performance of these activities may be accomplished by NSNFP suppliers when required. Personnel trained as technical staff in accordance with NSNFP 2.04 or equivalent may perform other tasks within a planned test.</p> <p>Exception: QA practices and concepts is not included in NSNFP training as a unique topic targeted to alternates to QA reviewers.</p> <p>Justification: This training topic supports the qualification and use of alternates to QA reviewers as described in QARD sections 3.2.2.K and 4.2.2.E. NSNFP does not use alternates to QA reviewers.</p> <p>Exception: Qualification requirements for Inspection, Nondestructive Examination, and are not applicable to NSNFP.</p> <p>Justification: The direct performance of Inspection, Nondestructive Examination, or Test by NSNFP is not anticipated. Performance of these activities may be accomplished by NSNFP suppliers when required</p>



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142(d) Design Control	QARD Section 3.0 Design Control	NSNFP 3.01, Design Control NSNFP 3.03, Engineering Analysis NSNFP 3.04, Engineering Documentation NSNFP 6.01, Review and Approval of NSNFP Internal Documents NSNFP 11.01, Testing NSNFP 19.02, Management of the Spent Fuel Database	<p>Comment:</p> <p>NSNFP is not the designer of record for repository systems, structures, and components (SSCs) important to safety or waste isolation, barriers important to waste isolation, and consumables important to safety or waste isolation. NSNFP design control measures are applied to (1) data collection and analysis activities that may generate information pertinent to the repository or other design and (2) that may be relied on in site characterization, licensing, and performance confirmation and (3) the computer software used in such data collection or analysis activities.</p> <p>The suitability for use of information processed or provided by NSNFP is determined by the end user (the license applicant's or licensee's designated designer or other designee).</p> <p>Exception: QARD Subsection 3.1 D is not applicable to NSNFP.</p> <p>Justification: While NSNFP provided information may be adopted by others for use in post closure analysis, the post closure analysis activity is performed by a designated OCRWM principal contractor or OCRWM supplier and not NSNFP.</p>



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142(d) Design Control (Continued)	QARD Section 3.0 Design Control (Continued)	NSNFP 3.01, Design Control NSNFP 3.03, Engineering Analysis NSNFP 3.04, Engineering Documentation NSNFP 6.01, Review and Approval of NSNFP Internal Documents NSNFP 11.01, Testing NSNFP 19.02, Management of the Spent Fuel Database	<p>Exception: Alternates to QA organization reviewers as discussed in QARD section 3.2.2.K are not used by NSNFP, NSNFP does not use supervisors for design verification as allowed by QARD section 3.2.4.G, and NSNFP does not use field changes as allowed by QARD section 3.2.6 but revises the document instead.</p> <p>Justification: Opting out of the use of alternates to QA organization reviewers, not using supervisors for design verification, and not using field changes to change design documents is conservative and does not reduce the NSNFP QA program effectiveness.</p> <p>Exception: The NSNFP QA implementing documents do not address procedural controls that provide criteria for determining when design documents that reflect the commitments of the Safety Analysis Report receive formal design verification.</p> <p>Justification: The controls stipulated by QARD Section 3.3.4 D are not applicable to NSNFP work scope.</p> <p>Exception: QARD Section 3.2.8 Sampling Plans does not apply to the NSNFP scope of work.</p> <p>Justification: Sampling activities are not germane to NSNFP tasks. NSNFP tasks do not include field studies involving sampling or inspection involving sampling</p>



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142(e) Procurement Document Control	QARD Section 4.0 Procurement Document Control	NSNFP 2.05, Planning/Quality Assurance Program Applicability Evaluations NSNFP 4.02, Acquiring Services NSNFP 6.01, Review and Approval of NSNFP Internal Documents	<p>Comment: The NSNFP procedures address the acquisition of services from government sector suppliers which may include procurement of material, equipment, and sub-tier services as an integral part of the overall work scope assigned to the government sector supplier. The NSNFP QAS performs audits and surveillances of government sector suppliers and the qualified procurement service. The qualified procurement service provides audits and surveillances of the private sector suppliers that are periodically observed by NSNFP QAS. Commercial grade item procurement and commercial grade item dedication, if needed, is conducted by a qualified procurement service. Procurement of commercial grade analytical services and commercial grade data is conducted by a NSNFP qualified procurement service.</p> <p>Exception: Alternates to QA organization reviewers as discussed in QARD section 4.2.2.E are not used by NSNFP.</p> <p>Justification: Opting out of the use of alternates to QA organization reviewers as described in QARD section 4.2.2.E is conservative and does not reduce the NSNFP QA program effectiveness.</p> <p>Exception: QARD Section 4.2.1K does not apply to the NSNFP.</p> <p>Justification: NSNFP is not engaged in procurement of services or items related to a basic component as defined by 10 CFR Part 21, Reporting of Defects and Noncompliance.</p>



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142(f) Instructions, procedures, and drawings	QARD Section 5.0 Procedures, Instructions, and Drawings	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan NSNFP 5.01 Preparing Draft Procedures NSNFP 5.05, Developing Forms NSNFP 6.01, Review and Approval of NSNFP Internal Documents NSNFP 11.01, Testing	Comment: NSNFP procedures identify QA records generated as a result of completing the procedure steps. In addition, NSNFP procedures identify the classification of those QA records as lifetime or nonpermanent. See exception regarding record classification at QARD section 17 of this matrix.
10 CFR 63.142(g) Document Control	QARD Section 6.0 Document Control	DOE/SNF/QAPP-001 NSNFP 5.01, Preparing Draft Procedures NSNFP 5.05, Developing Forms NSNFP 6.01, Review and Approval of Internal NSNFP Documents NSNFP 6.03, Managing Document Control and Distribution NSNFP 6.04, Review of External Documents NSNFP 11.01, Testing	Exception: Alternates to QA organization reviewers as discussed in QARD section 6.2.3F.2 are not used by NSNFP. Justification: Opting out of the use of alternates to QA organization reviewers as described in QARD section 6.2.2.3F.2 is conservative and does not reduce the NSNFP QA program effectiveness. Exception: NSNFP does not use expedited changes as described by QARD Section 6.2.7 or make editorial corrections without being subject to review requirements as described by QARD Section 6.2.8. All NSNFP document changes receive the same level of review as the original and result in document revisions. Justification: Opting out of QARD Sections 6.2.7 and 6.2.8 is conservative and does not reduce the NSNFP QA program effectiveness Exception: OCRWM reviews of principal contractor procedure(s) that direct the development and maintenance of their quality affecting procedures (QARD 6.2.3F.3) does not apply to NSNFP. Justification: NSNFP is not a principal contractor.



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
<p>10 CFR 63.142(h) Control of purchased material, equipment, and services.</p>	<p>QARD Section 7.0 Control of Purchased Material, Equipment, and Services</p>	<p>DOE/SNF/QAPP-001</p> <p>NSNFP 2.05, Planning/Quality Assurance Program Applicability Evaluations</p> <p>NSNFP 4.02, Acquiring Services</p> <p>NSNFP 6.01, Review and Approval of NSNFP Internal Documents</p> <p>NSNFP 7.02, Evaluation of Services from Government Sector Suppliers</p> <p>NSNFP 7.03, Acceptance of Products from Government Sector Suppliers</p> <p>NSNFP 16.02, Corrective Action</p> <p>NSNFP 18.01, Planning and Scheduling Assessments</p>	<p>Comments:</p> <p>The NSNFP interfaces with other entities in the government sector for the performance of tasks within the government sector. Consistent with QARD Section 7.1 A, NSNFP does not apply supplier selection and bid/proposal evaluation requirements of section 7.2.2 and 7.2.3 to government sector suppliers.</p> <p>The NSNFP interfaces with a qualified procurement service from the government sector for procurement of material, equipment, and services from the private sector when these private sector interfaces are not a logical subpart of an overall task assigned by NSNFP to a government sector supplier.</p> <p>Commercial grade procurement (QARD Section 7.2.12), if needed, is conducted by a qualified procurement service. This extends to the procurement of commercial grade items and, as applicable, commercial grade analytical services providing commercial grade data.</p> <p>NSNFP evaluates nonconforming items according to the requirements of QARD 15.0 to satisfy QARD 7.2.11 A</p>



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142 (i) Identification and control of materials, parts, and components 10 CFR 63.142(j) Control of special processes 10 CFR 63.142(k) Inspection	QARD Section 8.0, Identification and Control of Material, Parts, and Components QARD Section 9.0, Control of Special Processes QARD Section 10.0, Inspection	Not applicable	Exception: QARD sections 8.0, 9.0, and 10.0 do not apply to activities directly performed by NSNFP. Justification: The current mission and objectives of the NSNFP as delineated by DOE/SNF/PP-033 do not require direct performance by NSNFP of fieldwork subject to the requirements contained in Sections 8, 9, & 10 of the QARD.
10 CFR 63.142(l) Test Control	QARD Section 11.0 Test Control	NSNFP 11.01, Testing NSNFP 19.01, Software Control	Exception: Training and Qualification requirements for Inspection, Nondestructive Examination, and Test personnel are not applicable to NSNFP personnel. Justification: The direct performance of Inspection, Nondestructive Examination, or Test personnel activities by NSNFP is not anticipated. Performance of these activities may be accomplished by NSNFP suppliers when required. Personnel trained as technical staff in accordance with NSNFP 2.04 or equivalent may perform other tasks within a planned test.



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142(m) Control of measuring and test equipment 10 CFR 63.142(n) Handling, Storage, and Shipping 10 CFR 63.142(o) Inspection, test, and operating status 10 CFR 63.142(p) Nonconforming materials, parts, or components	QARD Section 12.0, Control of Measuring and Test Equipment QARD Section 13.0, Handling, Storage, and Shipping QARD Section 14.0, Inspection, Test, and Operating Status QARD Section 15.0, Nonconforming Materials, Parts, or Components	Not applicable	Exception: QARD sections 12.0, 13.0, 14.0 and 15.0 do not apply to activities directly performed by NSNFP. Justification: The current mission and objectives of the NSNFP as delineated by DOE/SNF/PP-033 do not require direct performance by NSNFP of fieldwork subject to the requirements contained in Sections 12.0, 13.0, 14.0, & 15.0 of the QARD.
10 CFR 63.142(q) Corrective action	QARD Section 16.0 Corrective Action	NSNFP 16.02, Corrective Action NSNFP 16.03, Quality Assurance Trending NSNFP 16.04, Stop Work NSNFP 18.02, Administration and Conduct of Audits NSNFP 18.03, Administration and Conduct of Surveillances	None Exception: Distribution of NSNFP trend reports (trend evaluations) are promptly distributed to NSNFP management versus OCRWM and OCRWM contractor management. Justification: QARD Section 16.2.6 D describes distribution relative to OCRWM and OCRWM contractor activities and is silent in regard to EM and NSNFP activities. Exception: QARD Section 16.2.2 C does not apply to the NSNFP. Justification: NSNFP is not engaged in activities related to a basic component as defined by 10 CFR Part 21, Reporting of Defects and Noncompliance or activities subject to 10 CFR 63.73, Reports of deficiencies.



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10 CFR 63.142(r) Quality assurance records	QARD Section 17.0 Quality Assurance Records	NSNFP 4.02, Acquiring Services NSNFP 5.01, Preparing Draft Procedures NSNFP 6.01, Review and Approval of NSNFP Internal Documents NSNFP 17.01, Records Management—Collecting QA Records NSNFP 17.03, Records Management—Facility Description and Practices	<p>Exception: NSNFP classifies QA records as lifetime or non-permanent, but retains all NSNFP captured QA records including NSNFP supplier provided QA records in temporary storage until turnover to OCRWM for permanent storage. A records index with retention times is not maintained by NSNFP.</p> <p>Justification: OCRWM retention and disposition instructions contained in records retention schedules are not passed down to NSNFP for implementation or information. The retention requirements of QARD 17.2.8 are implemented by OCRWM for those records turned over by NSNFP.</p> <p>In the event that residual records not needed by OCRWM or extra copies of records remain with NSNFP after records turnover, the QA records classifications of lifetime or nonpermanent may serve NSNFP disposition needs for those remaining records not required by OCRWM.</p> <p>Comment: File servers or other software and hardware supported electronic storage systems are not used by NSNFP.</p>



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
10 CFR 63.142(s) Audits	QARD Section 18.0 Audits	DOE/SNF/QAPP-001 NSNFP 7.02, Evaluation of Services from Government Sector Suppliers NSNFP 16.02, Corrective Action NSNFP 18.01, Planning and Scheduling Assessments NSNFP 18.02, Administration and Conduct of Audits NSNFP 18.04, Qualification of Audit Personnel	None.
NA	QARD Supplement I Software	NSNFP 3.03, Engineering Analysis NSNFP 3.04, Engineering Documentation NSNFP 4.02, Acquiring Services NSNFP 6.01, Review and Approval of NSNFP Internal Documents NSNFP 19.01, Software Control NSNFP 19.02, Management of the Spent Fuel Database	None.
NA	QARD Supplement II Sample Control	Not applicable	Exception: Sample control is not applicable to the activities of NSNFP. Justification: Activities performed directly by NSNFP personnel do not require control of samples.
NA	QARD Supplement III Scientific Investigation	NSNFP 2.05, Planning/Quality Assurance Program Applicability Evaluations NSNFP 3.03, Engineering Analysis NSNFP 3.04, Engineering Documentation NSNFP 11.01, Testing	Comment: NSNFP 11.01, Testing and NSNFP 3.03, Engineering Analysis address Supplement III Criteria, as applicable to the NSNFP mission and objectives established by DOE/SNF/PP-033.



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
NA	QARD Supplement IV Field Surveying	Not applicable	Exception: Field surveying is not applicable to the activities of NSNFP. Justification: Activities performed directly by NSNFP personnel to meet the mission and objectives of the NSNFP do not require control of field surveying.
NA	QARD Supplement V Control of the Electronic Management of Information	DOE/SNF/QAPP-001 NSNFP 3.03, Engineering Analysis NSNFP 17.01, Records Management –Collecting QA Records NSNFP 17.03, Records Management – Facility Description and Practices NSNFP 19.02, Management of the Spent Fuel Database NSNFP 19.03, Control of the Electronic Management of Information	None.
10 CFR 63.142 (b) Organization	QARD Appendix A Waste Custodian Interface	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan	None



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10 CFR 63.142 Reference	DOE/RW-0333P Revision 20 QARD Section	NSNFP Implementing Document	QARD Exceptions/Justifications or Comments
NA	QARD Appendix B	Not applicable	Comment: Appendix B of QARD Revision 20 is marked "intentionally blank".
NA	QARD Appendix C Storage and Transportation	DOE/SNF/QAPP-001, NSNFP Quality Assurance Program Plan	Comment: NSNFP information and analysis may be provided to OCRWM or others to support storage and transportation system decisions. The communication or translation of repository criteria for SNF or HLW storage and transportation systems is performed in accordance with established NSNFP procedures that are responsive to the QARD.