









**NYE COUNTY NUCLEAR WASTE
REPOSITORY PROJECT OFFICE**

QUALITY ADMINISTRATIVE PROCEDURE

TITLE: Records Management		REVISION: 4 DATE: 9-17-08 Page 1 of 11
PROCEDURE NUMBER: QAP-17.1	SUPERSEDES: Revision 3, 11-15-07	
APPROVAL  _____ Director	CONCURRENCE  _____ Geoscience Manager	
  _____ Date	  _____ Quality Assurance Officer	
	 _____ Date	 _____ 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 not 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 Director

The Director 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 Geoscience Manager

The Geoscience Manager (GSM) or designee is responsible for ensuring that QA records and associated metadata (i.e., those records that are specified as QA records in work

plans [WPs], test plans [TPNs], and technical procedures [TPs]) 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 GSM or designee is responsible for determining whether a record or records package shall be posted to the NWRPO website. The GSM or designee, with the Principal Investigator (PI), is responsible for identifying QA records in WPs, TPNs, and TPs, 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 with appropriate metadata and maintaining custody of all data and related QA records until they are submitted to the QA records specialist (QARS) and processed into the QARC. The PI, with the GSM or designee, is responsible for identifying QA records in work plans, test plans, and technical procedures.

The PI, or record transmitter, with the GSM or designee, is required to designate on the Record Transmittal Form (Attachment 2) 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 3).

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 NWRPO website (www.nyecounty.com), 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 Records 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 complete, legible, reproducible, and of durable material that can be preserved.
- The Record Transmittal Form 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 GSM 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 (Attachment 4)
 - Assign a RID number and hand-print it on the QA Record Stamp.
- 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 GSM or designee, transmit the record for posting on the NWRPO website, and if appropriate, process electronic files for inclusion to the LSN.

5.4.2 Geoscience Manager

Before the QARS enters the data from the Record Transmittal Form into the QA database, the GSM or designee shall review the metadata. If the metadata are not acceptable, the GSM 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 Director or designee, QAO, GSM 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 GSM 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 versioned rather than superseded. The original submission (Record Transmittal Form and data) shall remain intact in the record package. The revised data shall be submitted with a new Record Transmittal Form with a check mark in the Revised Record box, a revised transmittal date, and contain a brief description of how and why data were changed. The revised record shall maintain the same RID number as the original submission, clearly indicate that it is a revised version, and be filed in front of the original submission in the record package.

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*. Quality Assurance Program Plan. Nye County Nuclear Waste Repository Project Office. Pahrump, Nevada.

8.0 ATTACHMENTS

Attachment 1 NWRPO Website and LSN Documentary Material Record Types

Attachment 2 Record Transmittal Form

Attachment 3 LSN Privileged Document Transmittal Attachment

Attachment 4 Facsimile of QA Record Stamp

Attachment 1 NWRPO Website and LSN Documentary Material Record Types

Type of QARC Record	NWRPO WEBSITE (informati on only)	NWRPO WEBSITE (notify TDMS)	NWRPO LSN
DATA RECORDS			
Field Documents			
Field Scientific Notebooks			√
Borehole locations – YMP GPS Site Surveys		√	√
Well Completion Data			
Well Completion Diagrams		√	√
Wellhead Protection Details		√	√
Westbay MP Casing Summary Logs (including summary of port depths)		√	√
Geologic Data			
Core Sample Log, Alluvium Core Logging Forms		√	√
Cuttings Sample Logs, Alluvium & Non-Alluvium (Drill Cuttings) Logging Forms		√	√
Summary Lithologic Logs		√	√
Geologic Cross Sections		√	√
Geologic Lab Data		√	√
Magnetic Susceptibility Data from EWDP Drill Cuttings			√
SEM & Electron Microprobe Data			√
Geochronology		√	√
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, Surveys, and Summary Reports		√	√
Water Data			
EWDP Manual Water Level Data		√	√
Private Wells Manual Water Level Data		√	√
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			√
Water Geochemistry Laboratory Test Data		√	√
Manufacturer Calibration Reports / Certificates of Compliance			
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			√

Type of QARC Record	NWRPO WEBSITE (information only)	NWRPO WEBSITE (notify TDMS)	NWRPO LSN
Gas Sampling Data Packet (procedures, equipment manuals, lab information, chain of custody to lab, results, correspondence, reports)			√
DOCUMENT RECORDS			
Drilling Phase Reports		√	√
Tracer Test Reports		√	√
Annual Reports (includes geochemistry, ventilation, structural geology, regional water level annual reports)		√	√
Pump Test and Pump Spinner Test Reports		√	√
NWRPO Professional Papers		√	√
Presentations and Conference Paper Abstracts	√		√
Meeting, Technical Exchange, and Conference Comments			√
Document Reviews			√
NWRPO Plans and Procedures	√		√
Quality Assurance Program Plan	√		√
Quality Administration Procedures	√		√
Work Plans	√		√
Test Plans	√		√
Technical Procedures	√		√
Audits, Surveillances, NCRs, Misc. Issues, Corrective Actions	√		√

Attachment 2 Record Transmittal Form

Form QAP-17.1-1 Rev 2
9-17-08

Nye County Nuclear Waste Repository Project Office RECORD TRANSMITTAL FORM		RID Number
Transmitter Information		REVISED RECORD <input type="checkbox"/>
Name:	Date Transmitted:	
Title:	Organization:	
Number of Records:	Post to Website: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Privileged: <input type="checkbox"/> Yes <input type="checkbox"/> No	Filename(s):	
	LSN-Relevant: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Record Information		
Date:	Revision or Version (if applicable):	
Title:		
Author:	Author Organization:	
Type (e.g., data, memo, map, CD):		
Description:		
Keyword 1:	Keyword 2:	Keyword 3:
Metadata Information		
Data Collection Method:		
Data Collection Location:		
Data Source(s):		
Supporting Data:		
Data Censored:		
Data Processing:		
Data Limitations:		
Period(s):	Governing QA Procedure or Plan:	
Transmittal Frequency:	Direct Questions Concerning Data To:	
Transmitter:		
_____ Signature	_____ Date	
Principal Investigator:		
_____ Signature	_____ Date	
QA Records Specialist:		
_____ Signature	_____ Date	

Attachment 3
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 4
QA Record Stamp**



RID Number