Department of Energy
Washington, DC 20585

April 5, 2002

Mr. Martin J. Virgilio, Director
Office of Nuclear Materials Safety
and Safeguards
U.S. Nuclear Regulatory Commission
Two White Flint North
Rockville, MD 20852

Dear Mr. Virgilio:

During the September and December 2001 Quarterly Quality Assurance (QA) Meetings, the development of the Performance Improvement Transition Plan (currently, the OCRWM Management Improvement Initiatives [OMII]) was presented and discussed with you and your staff. Based on subsequent discussions with your staff, it is clear that the OMII, as submitted on January 31, 2002, did not meet NRC expectations. As you are aware, I have just been confirmed as the Director of the Office of Civilian Radioactive Waste Management. I am in the process of reviewing and evaluating all aspects of the Program. I assure you that QA is one of my highest priorities. It is a key to assuring the credibility and success of the licensing application for the Yucca Mountain Project. Therefore, I have decided to submit a totally revised OMII in the near future.

The revised OMII is being developed by a joint DOE/Bechtel SAIC Company, LLC management team and will be reissued to include relevant, comprehensive action summaries. In addition to Dr. J. Russell Dyer, Yucca Mountain Project Manager, I have assigned Gene E. Runkle of my Transition Team to support the OMII effort and provide direct input to me from the process. The OMII will be developed and administered as a plan and implemented under the QA program procedure AP-5.1Q.

In developing the revised OMII, we are taking the following actions:

- Identify deficiencies and recommendations from various assessments performed regarding our program and define a comprehensive set of actions to address the assessment results, including those from the eight sources discussed at the September 6, 2001, Quarterly QA Meeting.
- Revise the OMII to directly incorporate a comprehensive list of remedial and corrective actions previously incorporated only by reference to the relevant Corrective Action Reports (CAR).
- Incorporate relevant action summaries directly in the OMII and submit the complete OMII to the NRC.

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Action summaries will include:

1. Description of specific actions planned
2. Schedule for accomplishing the actions
3. Metrics for tracking completion status and measuring effectiveness of the actions
4. Identification of management and staff accountable for completion of the actions
5. Clear identification of actions including:
   - Remedial actions and actions to preclude recurrence for the Model and Software CARs
   - Other planned actions that are not directly part of CAR corrective actions but are within NRC regulatory purview and subject to the DOE QA Requirements and Description
   - Additional improvements from our business practices that are appropriate to support overall performance improvement.

Specific actions from management assessments, self-assessments, and OQA oversight will be an integral part of OMII. More importantly, OMII performance measures and results will be monitored by my Office to ensure timely and continuous improvements in the QA process.

If you require additional information or would like to further discuss our planned activities, please do not hesitate to call me.

Sincerely,

Dr. Margaret S.Y. Chu, Director
Office of Civilian Radioactive
Waste Management

Enclosure:
DOE Commitments

U.S. DEPARTMENT OF ENERGY COMMITMENTS:

1. Revision 1 to the OCRWM Management Improvement Initiatives will include relevant, comprehensive action summaries that are fully developed and incorporated into the document. The OCRWM Management Improvement Initiatives will be developed and administered as a plan and implemented under our Quality Assurance (QA) Program procedure AP-5.1Q.

2. Action summaries in the OCRWM Management Improvement Initiatives will include description of actions, schedule for the actions, metrics for completion status and measuring effectiveness, and identification of accountable management and staff.

3. Specific actions for management assessments, self-assessments, and QA oversight will be an integral part of OCRWM Management Improvement Initiatives and the success of its implementation. OCRWM Management Improvement Initiatives performance measures and results will be monitored by management and made widely available to all program participants.