



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 7, 2000

Mr. Dwight Shelor, Acting Director  
Program Management and Administration  
Office of Civilian Radioactive Waste Management  
U. S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

**SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION'S OBSERVATION AUDIT REPORT NO. OAR- 00-05, "OBSERVATION AUDIT OF OFFICE OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT, QUALITY ASSURANCE DIVISION, AUDIT NO. M&O-ARP-00-005"**

Dear Mr. Shelor:

I am transmitting the U.S. Nuclear Regulatory Commission's (NRC's) Observation Audit Report No. OAR-00-05 of the U.S. Department of Energy (DOE), Office of Civilian Radioactive Waste Management, Office of Quality Assurance (OQA), Yucca Mountain Quality Assurance Division, audit of the Waste Form Process Model Report (PMR) activities performed by the OCRWM Management and Operating Contractor (M&O). The audit, M&O-ARP-00-005, was conducted on January 31 through February 4, 2000, at the M&O facilities in Las Vegas, Nevada.

This audit was limited in scope and evaluated the effectiveness of the implementation of the OCRWM Quality Assurance QA Program described in the Quality Assurance Requirements and Description (QARD) and its implementing procedures for selected analysis model reports (AMRs) supporting the Waste Form PMR. During the conduct of the audit, both the audit team and the NRC observers reviewed the analysis reports, within the scope of the audit, and their supporting data and software. Because the AMRs reviewed were in draft and in the process of being completed, the DOE audit served more as a review than as an assessment. There were no deficiencies written. The NRC staff generally agrees with the audit team conclusions, findings, and recommendations. Further, the NRC staff agrees that this audit was effective in recommending improvements in the AMR process.

During the observation, the DOE provided information on the progress in reaching its goal of having 50 percent of the data supporting the Site Recommendation Considerations Report completed by May 2000. On January 31, 2000, the DOE had fully qualified 231 data-sets or data tracking numbers (DTNs) out of a projected 1600 DTNs. The DOE explained that the total number of DTNs was still evolving because several AMR preparers had not entered the data supporting the AMRs into the DTN tracking system. During the audit, the NRC staff expressed a concern about the lack of data qualification activities for the AMRs reviewed during the audit and the four previous audits. This appears to be a condition requiring DOE's management attention.

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During the audit, the NRC observers questioned DOE's basis for not re-qualifying low-risk significant data. The DOE informed the NRC observers that the sample plan, serving as the basis for not performing re-qualification of low-risk significant data, would be documented in a procedure by the end of February 2000, and would provide for feedback and corrective action should problems be identified in re-qualifying similar high-risk significant data.

The NRC observers concluded that: (a) the AMR developers, within the scope of this audit, produced technically adequate AMRs; however, both the NRC observers and OQA audit team members provided several comments on the technical content of the AMRs; (b) the Document Input Reference System, which is used to track DTNs, has improved; and (c) the implementation of changes to procedures controlling the AMR process and the communicating of lessons learned from the audits to the preparers of the AMRs could be improved by providing additional training or formal instruction.

The NRC observers generated no audit observer inquiries (AOIs) during the audit. However, we would like to point out that we have not received a response to an AOI, dated September 22, 1999, which addressed the qualification status and use of the waste stream profiles, and to AOIs, dated November 18, 1999, which addressed procedural concerns on the AMR process.

A written response to this letter and the enclosed report is not required. However, we do expect OQA to provide replies to the open AOIs. If you have any questions, please contact Larry L. Campbell of my staff at (301) 415-5000.

Sincerely,

C. William Reamer, Chief  
 High-Level Waste and Performance  
 Assessment Branch  
 Division of Waste Management  
 Office of Nuclear Material Safety  
 and Safeguards

Enclosure: NRC Observation Audit Report No. OAR-00-05, "Observation Audit of the Office of Civilian Radioactive Waste Management, Quality Assurance Division, Audit No. M&O-ARP-00-005"

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Letter to D. Shelor from C.W. Reamer dated: March 7, 2000

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