



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 31, 1995

Mr. Ronald A. Milner, Acting Director
Office of Program Management and Integration
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Milner:

SUBJECT: OBSERVATION AUDIT OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT
SYSTEM MANAGEMENT AND OPERATING CONTRACTOR CONTROL OF DEVELOPMENT/
REVISION PROCESS

I am transmitting the Nuclear Regulatory Commission Observation Audit Report 95-02 of the U.S. Department of Energy (DOE), Office of Civilian Radioactive Waste Management, Office of Quality Assurance audit of the Quality Assurance (QA) program of the Civilian Radioactive Waste Management System Management and Operating Contractor (M&O). The audit, HQ-ARP-95-03, was conducted from December 5-8, 1994, at the M&O offices in Vienna, Virginia. The limited-scope, performance-based audit evaluated the effectiveness of the M&O activities performed under the quality assurance (QA) system associated with the control of the development and revision of M&O technical requirements documents. No other organizations participated as observers of this audit.

The NRC staff observed the audit to evaluate the DOE audit process and to gain confidence that the M&O organization is properly implementing its controls for the development and revision of technical requirements documents. The NRC staff based its evaluation on direct observations of the audit team members; discussions with the audit team and M&O personnel; and reviews of the audit plan, the audit checklists, and other pertinent documents.

The NRC staff has determined that Audit HQ-ARP-95-03 was useful and effective. The audit was well organized and conducted in a thorough and professional manner.

The NRC staff agrees with the preliminary audit team finding that the overall implementation of the M&O control processes for developing and revising the technical requirements documents is adequate. However, the M&O management should closely monitor implementation. The audit team considered the process for developing and controlling the technical requirements documents to be complicated and urged M&O management to maintain oversight of its implementation. One preliminary Corrective Action Request (CAR) was discussed by the audit team at the post-audit meeting concerning the distribution of a wrong controlled document. The distribution error was identified during the audit, and the M&O distributed the correct document during the audit as remedial action.

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DOE should continue to monitor the implementation of the M&O QA program to ensure that future implementation is adequate. The NRC staff expects to participate in this monitoring as observers and may perform its own independent audits at a later date to assess M&O implementation of its QA program.

A written response to this letter or the enclosed report is not required. If you have any questions, please call Jack Spraul of my staff at (301) 415-6715.

Sincerely,

JS
Joseph J. Holonich, Chief
High-Level Waste & Uranium Recovery
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure: As stated

cc: R. Loux, State of Nevada
J. Meder, Nevada Legislative Counsel Bureau
R. Nelson, YMPO
C. Einberg, DOE/Washington, DC
M. Murphy, Nye County, NV
M. Baughman, Lincoln County, NV
D. Bechtel, Clark County, NV
D. Weigel, GAO
P. Niedzielski-Eichner, Nye County, NV
B. Mettam, Inyo County, CA
V. Poe, Mineral County, NV
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J. Hoffman, Esmeralda County, NV
C. Schank, Churchill County, NV
L. Bradshaw, Nye County, NV
W. Barnard, NWTRB
R. Holden, NCAI
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* See previous concurrence.

Dispatched: 02/01/95

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The NRC staff expects to participate in monitoring the corrective actions of the M&O and may perform its own independent audits at a later date to assess the M&O implementation of its QA program.

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DATE	01/18/95	01/25/95	01/ /95	01/ /95	

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