

memorandum

DATE: August 31, 1993

REPLY TO
ATTN OF: EM-343

SUBJECT: Headquarters Quality Assurance Division Observation Report No. 93EA-SR-AU-01

TO: D. Horton, RW-3

Although your memorandum to me dated July 30, 1993, which transmitted the subject report, does not request a response, the nature of the comments is such that I feel it necessary to provide my thoughts on this matter.

The subject report is disturbing to me because it appears to be contradictory, and factually incorrect.

On the one hand, the observer noted that the audit was well conducted as evidenced by the following:

- "The OCRWM Observer found the audit team qualified to perform the audit. The team was thorough and professional in the manner that they conducted the audit." (ref. section 4.0)
- "The audit team determined that the implementation of the Defense Waste Processing Division (DWPD) and Westinghouse Savannah River Company (WSRC) Quality Assurance (QA) Programs was considered to be effective The OCRWM Observer generally agrees with this determination." (ref. section 4.0)
- "Overall, the OCRWM Observer considers the EM-343 audit process to have been general effective in evaluating the adequacy and effectiveness of implementation of the DWPD and WSRC QA Programs for this audit." (ref. section 4.0)
- "The Audit Team Leader did an excellent job of maintaining accurate status control during the course of the audit." (ref. section 5.7)
- "The Auditor/Technical Specialists evaluating QA Program Elements 3 (including the Waste Acceptance checklist) and 19 were extremely diligent and thorough in the conduct of their portion of the audit." (ref. section 5.8)

On the other hand, the observer included a statement concerning internal relationships between the Department of Energy (DOE) organizations to the effect that "The defensive, adversarial attitude displayed by EM-343 during this and previous audits does little to foster an acceptable working relationship with OCRWM. This condition has existed for nearly 2 years and shows little or no sign of improvement." (ref. section 5.1)

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The implication that EM-343 and OCRWM are not working together to achieve Waste Policy Act objectives in managing one of the nations most important environmental and nuclear waste programs is most disturbing to me. It is my opinion that DOE managers in both organizations will agree that this statement is completely unwarranted. The fact that OCRWM approved the report containing this statement causes me great concern.

The points contained in this report, which I believe are misleading and inaccurate, were never raised in Observation Reports of six previous EM-343 audits of the West Valley Demonstration Project and the Defense Waste Processing Facility (DWPF). These audits, which commenced in February 1991, were observed by individuals representing OCRWM and the Nuclear Regulatory Commission.

The statement "The various innuendoes directed towards the Observers during the course of the audit are considered to be unprofessional and completely inappropriate." (ref. section 5.2) is disturbing. It should be noted that this observer never left the Audit Control room to participate in any of the audit interviews. Considering this lack of participation as an active observer, it is hard for me to understand how the observer arrived at the conclusion that "Much time and discussion was spent on relatively minor issues..." (ref. section 5.3).

With regards to the observers' "examples of deviations identified during the audit that were not properly documented as DCARs" (ref. sections 5.4a/5.4b), my staff has provided the following comments:

5.4a: There is no requirement that existing data requiring qualification be identified in the Waste Form Compliance Plan (WCP) or the Waste Qualification Report (WQR). The only requirement is that such data be identified and a method for qualification of the data be undertaken. The data and source documents requiring qualification are discussed in the "Plan for Qualification of Existing Data for Waste Acceptance," WSRC-RP-93-666, dated May 7, 1993. This document identifies the specific data and reports that will require qualification and the proposed method for qualification. The process for qualification and procedure (GT-QA-2-10) are consistent with the process outlined in NUREG-1298. An example of a data set that had been qualified was reviewed and was found to meet the requirements outlined in GT-QA-2-10. A copy of this report ("Qualification of Data on Glass Temperatures During Canister Filling and Cooldown," WSRC-RD-91-13, dated April 19, 1993), as well as the plan for qualification of data, was provided to the Technical Specialist/Observer during the Audit, and his comments were solicited during all discussions with WSRC/SR personnel.

5.4b: This concern by the observers appears to reveal a misunderstanding of the purpose of the WCP and WQR relative to vitrification plant operations. The WCP and WQR are summary level documents that show the method for demonstrating compliance and the supporting data showing compliance with the Waste Acceptance Product Specifications (WAPS). They are not being used to operate the plant or to procure equipment. Standard Operating Procedures are used to perform evolutions in the plant. Procurement documents are used to

purchase equipment such as canisters. The EM-343 audit of DWPF evaluated these programs as part of its scope.

Stating that configuration control is lost since the documents are not available in document control is not accurate. There are working-level documents (e.g., procedures, drawings site manuals, procurement documents, etc.) that ensure configuration is maintained. These documents will be entered into the document control system after completion of the Technical Review Group (TRG) process and approval by EM-343. Subsequent revisions will be controlled in a similar fashion.

Regarding the status of the WAPS, the observer apparently misunderstood its purpose. The WAPS were issued in February 1993 to address the requirements contained in the WA-SRD. A June 1993 surveillance of the WAPS indicated that the specifications were traceable to the WA-SRD. OCRWM's Corrective Action Requests from this surveillance are currently being addressed. The Operations Offices were directed to implement the WAPS immediately, which is why the WCP and WQR are being revised.

At a time when the Secretary of Energy is taking significant steps to enhance team work, total quality management, and communications across DOE, I strongly encourage that we work together to regain that spirit of unity and cooperation exhibited in the past between OCRWM and EM-343 for waste acceptance activities related to high-level waste form production.

If you would like to discuss this matter further, please contact myself (301-903-7188) or Mark Frei (301-903-7201).



Ralph E. Erickson, Director
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cc:

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