

MAR 15 1991

Mr. Dwight E. Shelor, Acting Associate Director
for Systems and Compliance
Office of Civilian Radioactive
Waste Management
U.S. Department of Energy, RW 30
Washington, D.C. 20585

Dear Mr. Shelor:

SUBJECT: OBSERVATION AUDIT OF THE U.S. DEPARTMENT OF ENERGY (DOE)
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM)

This letter transmits the U.S. Nuclear Regulatory Commission (NRC) Observation Audit Report No. 91-1 for the OCRWM Headquarters (HQ)/Yucca Mountain Project Office (YMPO) Quality Assurance (QA) Internal Audit No. 90-I-01 of HQ and YMPO conducted in Washington, D.C., October 15-19, 1990, and Las Vegas, Nevada, October 22-26, 1990. The NRC staff evaluated the HQ/YMPO QA audit to gain confidence that HQ and YMPO are properly implementing the requirements of the OCRWM QA program. The NRC staff based its evaluation of the QA program on direct observations of the auditors, discussions with the audit team, and reviews of the pertinent audit information (e.g., audit plan, checklists, HQ and YMPO documents).

The NRC staff has determined that HQ/YMPO Internal Audit No. 90-I-01 was effective for the limited amount of work being conducted under the OCRWM QA program. The audit was conducted in a professional manner, and the programmatic and limited technical portions of the audit were generally effective and well integrated. The audit team was well qualified in the QA discipline, and their assignments and checklist items were adequately described in the audit plan.

In general, the NRC staff agrees with the preliminary HQ/YMPO audit team finding that the OCRWM QA program has adequate procedural controls in place for the areas that were audited. However, the number of areas in which the HQ/YMPO audit team identified the OCRWM QA program as ineffective or indeterminate is of concern to the NRC staff, particularly the areas of audits and corrective actions at HQ and the technical baseline documents at both HQ and YMPO. The NRC staff fully supports the audit team's recommendations of actions to be taken to verify the effectiveness of corrective actions prior to the start of any new site characterization activities.

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OCRWM management must closely monitor the OCRWM QA program at both HQ and YMPO to ensure that future implementation is carried out in an adequate manner. The NRC staff expects to participate in this monitoring as observers and may perform independent audits at a later date to assess the adequacy and effectiveness of the QA programs. A written response to this letter or the enclosed report is not required. If you have any questions, please call Kenneth R. Hooks on 301/FTS-492-0447.

Sincerely,

ORIGINAL SIGNED BY

for 

John J. Linehan, Acting Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure:
As stated

- cc: C. Gertz, DOE/NV
- R. Loux, State of Nevada
- S. Bradhurst, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
- D. Weigel, GAO
- P. Niedzielski-Eichner, Nye County, NV

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