



Department of Energy

Washington, DC 20585

DEC 21 1992

Mr. Joseph J. Holonich, Director
Repository Licensing and Quality Assurance
Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Holonich:

The Office of Quality Assurance (OQA) of the U.S. Department of Energy (DOE) Office of Civilian Radioactive Waste Management has issued the document, Quality Assurance Requirements and Description (QARD), DOE/RW-0333P, Revision 0, effective December 18, 1992. The DOE is transmitting this document to the U.S. Nuclear Regulatory Commission (NRC) for formal review and acceptance (Enclosure 1).

Source Requirements matrices indicating where the NRC Review Plan (Revision 2) and NQA-1 (1989) criteria are covered in the new QARD are also enclosed (Enclosures 2 and 3).

The NRC is requested to formally review and accept the DOE/RW-0333P QARD, Revision 0. This document incorporates the changes resulting from the NRC's informal review of Draft OD. As requested during informal review, further explanation for DOE's position on external audit scheduling is enclosed (Enclosure 4). A matrix indicating where the Software requirements in the DOE/RW-0214 QARD are found in the DOE/RW-0333P QARD is also enclosed (Enclosure 5).

The DOE/RW-0333P QARD document represents the highest-level quality assurance (QA) requirements for the Civilian Radioactive Waste Management Program. It incorporates requirements from regulatory, commitment, and appropriate guidance documents. Implementing documents will translate the QARD requirements into administrative work processes. Therefore, the quality assurance program for the Civilian Radioactive Waste Management Program consists of the DOE/RW-0333P QARD plus the implementing documents from all affected organizations. Since this document represents a new, baselined QA requirements document, all previous QA program commitments are superseded. Rationale and justification for this are provided in the enclosures to this letter and the NRC Review Plan and NQA-1 matrices.

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Upon completing the implementation of the DOE/RW-0333P QARD, the DOE/RW-0214 QARD and all affected organizations' Quality Assurance Program Description Documents (or Quality Assurance Program Plans) will be superseded. However, since the DOE/RW-0333P QARD does not degrade or relax regulatory QA requirements contained in those documents, the impact on the Program will be minimal.

The DOE/RW-0333P QARD will be effective when issued. However, there will be a phased implementation of the document. This phased implementation is described in an approved Implementation Plan.

The Implementation Plan requires each affected organization to review the document, assign implementation personnel, evaluate the impact of the new document on procedures and training, then submit a Transition Plan to the OQA. Each Transition Plan will provide information on the documents to be revised including order of priority and a schedule for completing the revisions. The implementation of the DOE/RW-0333P QARD at each organization will follow the timetable described in its Transition Plan. When document revisions are complete, each affected organization will submit a QARD Implementation Matrix and its implementing document describing its organization to OQA for review and acceptance. OQA will issue a letter to the affected organization indicating its acceptance of the documentation and approval and authorization to proceed with implementation of the DOE/RW-0333P QARD.

Once all affected organizations are ready to implement fully the DOE/RW-0333P QARD, the DOE/RW-0214 QARD will be withdrawn and subsequent Program activities will be fully conducted in compliance with the new QARD.

If you have any questions regarding this subject, please contact either Robert Clark at (202) 586-1238 or Sharon Skuchko at (202) 586-4590.

Sincerely,



for

John P. Roberts
Acting Associate Director for
Systems and Compliance
Office of Civilian Radioactive
Waste Management

5 Enclosures

1. OCRWM Quality Assurance Requirements and Description, DOE/RW-0333P, Revision 0
2. Source Requirements Matrix, Review Plan, Review 2
3. Source Requirements Matrix (NQA-1, 1989)
4. DOE Position on the Scheduling of External Audits
5. Software Requirements Matrix

cc w/Enclosures:

- C. Gertz, YMPO
- T. J. Hickey, Nevada Legislative Committee
- R. Loux, State of Nevada
- M. Baughman, Lincoln County, NV
- J. Bingham, Clark County, NV
- B. Raper, Nye County, NV
- P. Niedzielski-Eichner, Nye County, NV
- G. Derby, Lander County, NV
- P. Goicoechea, Eureka, NV
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- F. Mariani, White Pine County, NV
- V. Poe, Mineral County, NV
- E. Wright, Lincoln County, NV
- J. Pitts, Lincoln County, NV
- R. Williams, Lander County, NV
- J. Hayes, Esmeralda County, NV
- B. Mettam, Inyo County, CA
- K. Hooks, NRC