

MINUTES OF THE OCTOBER 28, 1992, DOE PRESENTATION
ON THE QUALITY ASSURANCE REQUIREMENTS AND DESCRIPTION DOCUMENT
AND THE OCRWM AUDIT PROGRAM

On October 28, 1992, representatives of the U.S. Department of Energy (DOE) Office of Civilian Radioactive Waste Management (OCRWM), met with staff of the U.S. Nuclear Regulatory Commission at the NRC Headquarters in Rockville, Maryland. The purpose of the meeting was for the OCRWM representatives to present their draft Quality Assurance Requirements and Description document (QARD) and revisions to the OCRWM Audit Program. Attendees included representatives from the State of Nevada, U.S. Geological Survey, Weston, and CER Corporation. Although they were invited, there were no representatives of affected units of local government. An attendance list is included (Attachment 1).

The meeting began with opening remarks and introduction of attendees. OCRWM then began its presentation of the draft QARD (Attachment 2). The draft QARD is intended to incorporate and clarify all QA program requirements into a single document that can be used by all organizations in the DOE Civilian Radioactive Waste Management program. In addition to distributing copies of the draft QARD, OCRWM also distributed briefing charts that summarized the QARD (Attachment 3) and a matrix (Attachment 4) relating the draft QARD to the NRC Review Plan.

During the presentation, OCRWM noted that it wanted NRC to provide its comments on the QARD as they arose and that it wanted to have all of the NRC comments within the next two weeks so that OCRWM could finalize and formally transmit the QARD to NRC during the week of November 23, 1992. DOE also noted that it would entertain comments from the State of Nevada, although it was not requesting such comments. NRC responded that although it would expedite the review, it could not commit to a schedule for providing comments until it has had a chance to review the document. The NRC noted that the staff has other commitments that would preclude its undivided attention to the review over the next two weeks. The NRC staff also noted that in reviewing the document, it would be evaluating OCRWM commitments to NQA-1. Therefore, the staff noted, its review would be facilitated by OCRWM providing a matrix of NQA-1 requirements versus QARD commitments. OCRWM responded that this matrix would be provided during the first week of November 1992.

There was then some additional discussion as to how OCRWM wanted comments on the draft QARD presented and how NRC would develop and present its comments. Commitments were also made to keep the State of Nevada informed during this process. The State of Nevada asked about getting a copy of the NQA-1 matrix and OCRWM agreed to provide a copy to the State of Nevada at the same time it is sent to the NRC.

The presentation then turned to the OCRWM Audit Program (Attachment 5). The new OCRWM Audit Program will focus on performance based audits of work products and services and reduce programmatic reviews. During this presentation, NRC raised a point regarding the use of scoping visits by OCRWM prior to conducting an audit. NRC noted that there have been occasions where

programmatic elements had been selected for audit even though there was no work being conducted under that programmatic element. The State of Nevada agreed with this statement. OCRWM agreed to be more sensitive about avoiding the recurrence of this situation. OCRWM later noted that the revisions to the OCRWM Audit Program will not commence until the QARD is implemented. In the meantime, audits will be conducted much the same as they were during fiscal year 1992.

In concluding the presentation, OCRWM noted that during a recent telephone conversation it had received some informal comments from NRC on changes to the participants' quality assurance program plans. During that conversation, OCRWM considered the possibility of responding to those comments in a formal letter to NRC. However, because it plans on issuing the QARD within the next 45 days and believes that all of those comments are addressed in the QARD, OCRWM noted that it would not be addressing those comments separately. NRC agreed to this means of responding to the comments provided that the QARD is issued in a timely manner. The meeting was adjourned.

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- Attachments:
1. List of Attendees
 2. Draft QARD
 3. QARD Briefing Charts
 4. Matrix
 5. OCRWM Audit Program Briefing Charts

DIVISION OF HIGH-LEVEL WASTE MANAGEMENT
NMSS, NRC

ATTENDANCE LIST

SUBJECT OF MEETING: QARD / AUDIT PROCESS

DATE: 10/28/92

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