



Department of Energy
Washington, DC 20585

QA: N/A

MAR 27 2003

MEMORANDUM FOR: Dr. Margaret S. Y. Chu (RW-1)

FROM: R. Dennis Brown, Director
Office of Quality Assurance *RDB*

SUBJECT: Issuance of Deficiency Report (DR) OCRWM(O)-03-D-075
Regarding the Office of Civilian Radioactive Waste Management
(OCRWM) Reorganization Without Revision to the Quality
Assurance Requirements and Description

Enclosed is DR OCRWM(O)-03-D-075 generated as a result of an observation.

Please provide a response to this deficiency that meets the applicable requirements of Administrative Procedure (AP) 16.1Q, *Management of Conditions Adverse to Quality*. Send the original of your response to Deborah G. Opielowski, Navarro Quality Services, P.O. Box 364629, Mail Stop 455, North Las Vegas, Nevada 89036-8629. Initial response to the DR is due ten working days from the date of this letter. Any extension to the due date must be requested in accordance with AP-16.1Q.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Kristi A. Hodges at (702) 794-1464.

OQA:JB-0739

Enclosure:
DR OCRWM(O)-03-D-075

cc w/encl:
R. A. Milner, DOE/HQ (RW-2E), FORS
N. K. Stablein, NRC, Rockville, MD
Robert Latta, NRC, Las Vegas, NV (2 cys)
S. W. Lynch, State of Nevada, Carson City, NV
L. W. Bradshaw, Nye County, Pahrump, NV
W. J. Glasser, NQS, Las Vegas, NV
K. A. Hodges, NQS, Las Vegas, NV
D. G. Opielowski, NQS, Las Vegas, NV
W. J. Arthur, III, DOE/ORD (RW-2W), Las Vegas, NV



*NM55 07
WM 11*

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
 U.S. DEPARTMENT OF ENERGY
 WASHINGTON, D.C.

ORIGINAL
 THIS IS A RED STAMP

8. Deficiency Report
 Corrective Action Report

No OCRWM(0)-03-D-075

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QA QA

DEFICIENCY REPORT/CORRECTIVE ACTION REPORT

1. Controlling Document (Document ID and Revision or Date)
 DOE/RW-0333P Rev 6 and LP-1.1Q-OCRWM Rev 0, ICN 0

2 Related Report No.
 NA

3 Responsible Organization:
 RW-1

4 Discussed With
 Dennis Brown and Joseph Ziegler

5 Requirement
 DOE/RW-0333P Rev 6, Section 1.3.1 B.2. states that "Any substantial OCRWM reorganization of descriptions or functions of the offices described herein, will require a revision to this document." Section 1.3.2 C. - E. provides the descriptions and functions for the Office of Acceptance Transportation and Integration, Office of Program Management, and the Yucca Mountain Site Characterization Office.

LP-1.1Q-OCRWM, Section 5.4 requires that a Functional Position Description is developed and maintained for each employee Attachment 2 of LP-1.1Q-OCWRM provides the functions, responsibilities, and authorities for the OCRWM organization. Specifically, Section 1.3, 1.4, and 1.5 of Attachment 2 provides the functions for the Office of Acceptance Transportation and Integration, Office of Program Management, and the Yucca Mountain Site Characterization Office respectively. Attachments 3, 4, and 5 of LP-1.1QOCRWM provide the respective organizational charts that support the OCRWM organization described in Attachment 2.

6. Description of Condition
 Contrary to the above, the organization realignment announced on the OCRWM database to be effective on 10/28/2002, the Offices both in title and function for the Office of Acceptance Transportation and Integration, the Office of Program Management and Administration, and the Yucca Mountain Site Characterization Office described in DOE/RW-0333 and LP-1.1Q-OCRWM have been changed.

Examples of functional changes include: waste acceptance analysis & strategy, safeguards, and utility contracts are the responsibility of the Office of Systems Analysis and Strategy Development in the 10/28/2002 organization and are listed under the Office of Acceptance Transportation and Integration in DOE/RW-0333. These changes appear to violate the requirements of DOE/RW-0333.

With the position changes and creation of new positions, a Functional Position Description is not available for each employee as required by Section 5.4 of LP-1.1Q-OCRWM. For example, Functional Position Descriptions for the staff of the Office of License Application and Strategy are not available.

Has work been stopped? Yes No

7. Initiator.
 DENNIS R. WILLIAMS *[Signature]* 1/15/2003
 Printed Name Signature Date

9 Does a stop work condition exist?
 Yes No N/A

If Yes, Check One: A B C D

10 Recommended Actions:
 Revise DOE/RW-0333 and LP-1.1Q-OCRWM to reflect the organizational and functional changes. Create Functional Position Descriptions and revise others as needed to reflect the organizational changes.

11 QAR Review
 Kristi A. Hedges *[Signature]* 2/18/03
 Printed Name Signature Date

12 Response Due Date
10 Working days after issuance

13 QAM Issuance Approval
 R. Dennis Brown *[Signature]* 3/26/03
 Printed Name Signature Date

14 Corrective Actions Verified/Closure.
 QAR Printed Name Signature Date

15 QAM Closure Approval
 Printed Name Signature Date