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Donald G. Horton, Director  
Office of Quality Assurance  
Office of Civilian Radioactive Waste Management  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585

APPLICATION OF THE OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM) QUALITY ASSURANCE (QA) PROGRAM TO THE YUCCA MOUNTAIN PROJECT (YMP) ENVIRONMENTAL PROGRAM

As you are aware, Nye County observed the QA qualification audits of OCRWM -- headquarters and project office -- and its technical and management support services prime contractor Science Applications International Corporation (SAIC) during the latter part of 1990.

As a result of this participation, and after review of the audit reports, the County would like to bring to your attention its concern that the audits inadequately assessed OCRWM and YMP's environmental program QA compliance and request that you address this situation.

This assessment is based upon the following:

- To the County's knowledge, the audit scopes for HQ, YMP or SAIC did not explicitly include the environmental program implementation of the QA Requirements Document (QARD), even though it is clear that program elements meet the criteria for application of requirements and controls specified in section 2.5 of the QARD. The County would have preferred to have given the environmental program the same comprehensive attention as was given to the technical baseline and the study plans.
- The County is concerned about the adequacy of the management controls that have been applied to the environmental program. When asked why the environmental program was not within the scope of the DOE audits, it was explained that the program responsibility had been delegated to SAIC (an action taken just days before the YMP audit). When SAIC was asked to describe the controls and planning documents it was operating under, it was explained that the controls and planning documentation was established by DOE.
- For example, it was explained that the Radiological Monitoring Plan and the Environmental Field Activity Plans (EFAPs) were YMP documents and, therefore, the

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application of QA controls during their production was the responsibility of YMP. SAIC's responsibility was for the implementation of these documents through Standard Practice (SP) and Work Instruction (WI) documents. Further, it was elaborated that since audits review historic implementation and do not address future planning requirements, the consideration of the SP's and the WI's was not within the audit scope.

- As another example, apparently extensive data has been collected under a YMP interagency agreement with the Environmental Protection Agency (EPA). This work was terminated by the end of September, 1990. Because this data was collected under EPA's QA program, it must be "qualified" before it can be used. This qualification process will be done under APQ 5.9, but YMP's plans for doing so were not considered within the audit.
- The SAIC audit report discussed the RMP, but identified no deficiencies. It did, however, make recommendations for strengthening the interfaces between documents.
- The Radiological Monitoring Program both generates data and integrates data from other program elements. The interface with these other program elements did not appear to be audited.
- Past surveillances have identified that data from air and meteorologic stations will need to be revalidated due to insufficient calibration controls being applied under past data collection procedures.

In summary, it is quite likely that each of these conditions, when considered independent of each other, can likely be explained by the program staff. The County is concerned, however, that if the environmental program is adequately surveilled or audited in the aggregate, it will be found to lack clear management control, effective delegation of authorities, objective evidence of grading procedures being appropriately applied and understandable planning document interfaces.

Your timely attention to this concern is requested and would be appreciated.



Phillip A. Niedzielski-Eichner  
Nye County Technical Advisor

cc: S. Bradhurst, Nye County  
E. Holstein, Nye County  
✓ K. Hooks, NRC