

snl qa program

JUN 6 1 1990

Mr. Ralph Stein, Associate Director
for Systems Integration and Regulations
Office of Civilian Radioactive Waste Management
U. S. Department of Energy, RW 30
Washington, D.C. 20585

Dear Mr. Stein:

SUBJECT: REQUEST FOR UNITED STATES NUCLEAR REGULATORY COMMISSION (NRC)
APPROVAL OF SANDIA NATIONAL LABORATORIES (SNL) QUALITY
ASSURANCE (QA) PROGRAM

Your letter of April 6, 1990, to Mr. Robert Browning, Director of the NRC Division of High-Level Waste Management, stated the Department of Energy's (DOE's) position that "...the SNL QA program is acceptable to initiate activities supporting new site characterization." It also requested acceptance by the NRC staff of the QA program at the SNL. The purpose of this letter is to respond to your request.

As indicated in my letter of November 8, 1989 to you which transmitted our Observation Audit Report of DOE's Audit No. 89-03 of SNL, we believe that "...the Sandia QA program has adequate controls in place to continue the YMP work". Implementation in the near term will involve activities such as the development of study plans and technical procedures (i.e., activities which support new site characterization). Such activities will allow DOE to demonstrate its ability to implement its QA program prior to start of any new site characterization activities.

As discussed in the February 15, March 21, and April 27, 1990 NRC/DOE QA meetings, the NRC staff requires the following information to complete our evaluation of each DOE program participant QA program: a statement regarding resolution of program deficiencies identified by the participant, DOE or the NRC (all significant deficiencies resolved); identification of the extent of program implementation since the last NRC-observed DOE audit (including work products produced and audits/surveillances conducted); a statement as to whether DOE can now determine the effectiveness of the participant QA program (and if so, what determination has been made); a statement of what areas of the QA program are still on hold (and the steps being taken to resolve the problems in these areas); and a statement of DOE's current position on the acceptability of the participant QA program to initiate new site characterization activities.

The DOE Audit Report for Audit 89-03 of SNL from September 11-15, 1989, (letter: Wilnot to Hunter dated October 12, 1989) stated that the effectiveness of the SNL QA program could not be determined due to lack of implementation; the NRC Observation Audit Report (letter: Linehan to Stein dated November 8, 1989) concurred. OCRWM Surveillance Report Number OCRWM HQ-SR-89-014 (Enclosure 1 to your April 6, 1990, letter) also states that there was very little program implementation to review during Audit 89-03. In addition, the NRC report noted specific concerns about the SNL audit and surveillance program and the corrective

9006050302 900601
PDR WASTE
WM-11 PDC

102.7
WM-11
NH16/1

action program; adequate functioning of these QA program controls appears vital to provide confidence that the SNL QA program can detect and correct program deficiencies.

The NRC staff finds that your April 6, 1990, letter fails to adequately identify implementation of the SNL program which has taken place since September 15, 1989, and how this implementation enables DOE to determine that the SNL QA program is now effective. The information in your letter of April 6, 1990, concerning DOE/YMPO task force surveillances of SNL appears to cover only Fiscal Year 1989 activities, based on the Surveillance Report Numbers. Your letter does not appear to cover any DOE/YMPO surveillances subsequent to Audit 89-03. OCRWM Surveillance Report Number OCRWM HW-SR-89-014 merely states that Audit 89-03 was acceptable, a position with which we agreed in our Observation Audit Report. Additionally, there is no information in your letter which indicates that SNL has performed audits or surveillances of the work products resulting from implementation since Audit 89-03, that deficiencies found in Audit 89-03 have been properly evaluated for significance and root cause, and that effective corrective actions have been implemented.

Our acceptance of the QA program for new site characterization work (i.e., data collection, excavation of trenches, drilling new boreholes, etc.), thus resolving the NRC QA objection in the Site Characterization Analysis for SNL, can occur only after DOE and SNL have demonstrated the ability to implement the QA program adequately.

If you have any questions concerning our position, please contact Mark Delligatti of my staff on (301) 492-0430 or FTS 492-0430.

Sincerely,

ORIGINAL SIGNED BY

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

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

DISTRIBUTION

Central File	B.J. Youngblood	R.E. Browning	J. Bunting
LSS	J. Linehan	R. Ballard	On-Site Reps
CNWSA	NMSS R/F	HLPD R/F	K. Hooks
LPDR	ACNW	PDR	M. Delligatti
T. Verma	B. Belke	J. Holonich	J. Conway

*See previous concurrence

OFC :HLPD*	:HLPD*	:HLPD	:	:	:	:	:

NAME:KHooks/wd	:MDelligatti:JL/linehan:	:	:	:	:	:	:

DATE:05/21/90	:05/21/90	:05/21/90:	:	:	:	:	:

snl qa program

action program; adequate functioning of these QA program controls appears vital to provide confidence that the SNL QA program can detect and correct program deficiencies.

The NRC staff finds that your April 6, 1990, letter fails to adequately identify implementation of the SNL program which has taken place since September 15, 1989, and how this implementation enables DOE to determine that the SNL QA program is now effective. The information in your letter of April 6, 1990, concerning DOE/YMPO task force surveillances of SNL appears to cover only Fiscal Year 1989 activities, based on the Surveillance Report Numbers. Surveillance Report Number OCRWM HW-SR-89-014 merely states that Audit 89-3 was acceptable, a position with which we agreed in our Observation Audit Report. Additionally, there is no information in your letter which indicates that SNL has performed audits or surveillances of the work products resulting from such implementation, that deficiencies found have been properly evaluated for significance and root cause, and that effective corrective actions have been implemented.

Our acceptance of the QA program for new site characterization work (i.e., data collection, excavation of trenches, drilling new boreholes, etc.), thus resolving the NRC QA objection in the Site Characterization Analysis, can occur only after DOE and SNL have demonstrated the ability to implement the QA program adequately.

If you have any questions concerning our position, please contact Mark Delligatti of my staff on (301) 492-0430.

Sincerely,

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

- cc: R. Loux, State of Nevada
- C. Gertz, DOE/NV
- S. Bradhurst, Nye County
- M. Bayghman, Fiskdale, MA
- D. Bechtel, Clark County
- D. Weigel, GAO

DISTRIBUTION

Central File	B.J. Youngblood	R.E. Browning	J. Bunting
LSS	J. Linehan	R. Ballard	On-Site Reps
CNWRA	NMSS R/F	HLPD R/F	K. Hooks
LPDR	ACNW	PDR	M. Delligatti
T. Verma	B. Belke	J. Holonich	J. Conway

OFC :HLPD *JK* :HLPD *MD* :HLPD :HLPD : : : :

 NAME:KHooks/wd :MDelligatti:JLinehan: : : :

 DATE:05/21/90 :05/21/90 :05/ /90:05/ /90: : : :