

KH/LLNL QA PROGRAM 2

JUL 17 1990

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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: UNITED STATES NUCLEAR REGULATORY COMMISSION (NRC) ACCEPTANCE OF LAWRENCE
LIVERMORE NATIONAL LABORATORY (LLNL) QUALITY ASSURANCE (QA) PROGRAM

Your letter of April 13, 1990, to Mr. Robert Browning, Director of the NRC Division of High-Level Waste Management, requested acceptance by the NRC staff of the QA program at LLNL "... to initiate activities supporting new site characterization". As indicated in my letter to you dated August 1, 1989, which transmitted the NRC staff's Observation Audit Report of DOE's Audit No. 89-06 of LLNL, the NRC found that LLNL had an adequate QA program for the areas which were audited, and qualified QA and technical personnel. The NRC staff continues to believe that the LLNL QA program has adequate controls in place to continue Yucca Mountain Project work, such as the development of study plans and technical procedures (i.e., activities which support new site characterization). Such activities will allow LLNL to demonstrate its ability to implement its QA program prior to the start of any new site characterization activities.

Our evaluation of the acceptability of the QA program for new site characterization work (i.e., data collection, testing, etc), thus resolving the NRC QA objection in the Site Characterization Analysis for LLNL, will occur after DOE has determined that LLNL has demonstrated the ability to effectively implement an adequate QA program. 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.

In documenting your evaluation of the adequacy and effectiveness of implementation of the LLNL QA program, the NRC staff believes that you should specifically address unresolved items from your audits and surveillances of the LLNL QA program. As an example, the DOE Report for Audit No. 89-06 from June 5-9, 1989 (ref. Wilmot/Jardine letter dated July 2, 1989) stated:

It should be noted that the LLNL QA Program does not fully meet the

provisions of the Yucca Mountain Project Quality Assurance Plan NWWSI/88-9, Revision 2. Neither the LLNL Software QA Plan nor QA Level Assignment and grading efforts have been approved by the Project Office. The effectiveness of the LLNL QA Program cannot be determined at this time because the implementing plans and technical procedures have not been completed and the limited quantity of technical products issued to date is insufficient to allow an effectiveness conclusion.

As agreed at the April 27, 1990, NRC/DOE QA meeting, DOE will write a letter to the NRC requesting NRC acceptance of the LLNL QA program for new site characterization activities after DOE determines that program implementation is effective. The NRC staff would expect this letter documenting your evaluation of the LLNL QA program to include a statement as to whether DOE can now determine the effectiveness of the QA program (and if so, what determination has been made) and 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).

The NRC wishes to note that your letter of April 13, 1990, which specifically requests NRC acceptance of the LLNL QA program "...to initiate activities supporting new site characterization" appears unnecessary, since subsequent discussion between the NRC and DOE established that this phrase meant development of study plans, technical procedures and other documents to control work rather than generation of data to be used in licensing. The NRC staff presented a summary of the status of NRC reviews of DOE QA programs at the February 15, 1990 NRC/DOE QA meeting (enclosed), which indicated that LLNL was "acceptable for continued implementation." The NRC believes that all the QA programs identified in the enclosed list as "acceptable for continued implementation" are adequate "...to initiate activities supporting new site characterization," as defined above.

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

Sincerely,

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

- cc: C. Gertz, DOE/NV
- S. Bradhurst, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
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** see previous correspondence*

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

Sincerely,

John J. Linehan, Director
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OFC :HLPD	:HLPD	:HLPD	:	:	:
NAME:KHooks/vw	:JLinehan	:M.Delligatti	:	:	:
Date:07/12/90	:07/ /90	:07/12/90	:	:	:

STATUS OF NRC REVIEWS OF QA PROGRAMS

ORGANIZATION	EFFECTIVENESS OF DOE AUDIT	ADEQUACY OF AUDITED PROGRAM	ACCEPTABILITY FOR STARTING SITE CHARACTER- IZATION
FSN	OK	ACCEPTABLE FOR CONTINUED IMPLEMENTATION	?
H&N	OK	" "	?
LLNL	OK	" "	?
SANDIA	OK	" "	? AUDIT OR SUR- VEILLANCE REQ'D
USGS	MARGINAL	" "	? AUDIT OR SUR- VEILLANCE, INDEPENDENT NRC AUDIT REQ'D
LANL	OK	CORRECTIVE ACTIONS REQUIRED	? AUDIT REQUIRED
REECO	NO TECHNICAL TEAM	ACCEPTABLE FOR CONTINUED IMPLEMENTATION	? AUDIT OR SUR- VEILLANCE REQ'D
YMPO	N/A	N/A	?
OCRWM	N/A	N/A	?