



Department of Energy

Washington, DC 20585

MAY 28 1991

Mr. John J. Linehan
Director
Division of High-Level
Waste Management
Office of Nuclear Material
Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Linehan:

This letter is an update to our letter of March 4, 1991 (Desell to Linehan), which responded to your letter of December 14, 1990 (Linehan to Shelor), regarding two observations made by the U.S. Nuclear Regulatory Commission (NRC) on Sandia National Laboratories (SNL) Quality Assurance (QA) Audit 90-04, conducted at Albuquerque, New Mexico, during August 20-24, 1990.

The observations are noted in Section 5.10(a) of the NRC Observation Audit Report No. 90-7 and are identified as Observations 5.10(a)(1) and (2). This letter provides an updated response to the subject observations and supersedes the information provided in our March 4, 1991, letter. The individual observation and the corresponding update status is presented below:

Observation 5.10(a)(1)

"The SNL QA Program Plan contains provisions for resolving concerns regarding inadequate quality in accordance with Yucca Mountain Site Characterization Project (YMP) Administrative Procedure 5.8Q, 'Resolution and Reporting of Quality Concerns.'" This procedure has not been developed by U.S. Department of Energy (DOE) and implemented by DOE and its program participants. NRC will carry this as an open item on the NRC/DOE Open Items List until this procedure is developed and implemented (Level 2). (Refer to Section 5.3(a) for details)"

Updated Status

The procedure that was to be developed and implemented in April 1991, is in the last steps of comment resolution and has not been completed. The new date for completion of these actions is July 1, 1991.

Observation 5.10(a)(2)

"During the audit of Criteria 10 and 18, there was a discussion of whether audit and surveillance checklists are considered QA records. It was the NRC staff's understanding during the review and commitments described in Section 17 of the Nevada Nuclear Waste Storage Investigations 88-9 YMP QA Plan, that all records would include audit and surveillance checklists. This subject was discussed at the September 18, 1990, NRC/DOE QA meeting and will be further discussed at the next NRC/DOE QA meeting in November 1990. This will be carried as an open item on the NRC/DOE Open Items List until clarification is obtained to define what types of QA records will be retained (Level 3). (Refer to Sections 5.3(e) and (h) for details)"

Updated Status

As discussed in the DOE letter of March 4, 1991, a policy decision has been made by the Office of Civilian Radioactive Waste Management Office of Quality Assurance (OQA) not to retain the audit and surveillance checklists as QA records. However, the pertinent information from these checklists will be made part of the audit or surveillance report, which will be a QA record. The SNL QA Program is consistent with this decision and, therefore, it is the position of OQA that this observation is resolved.

DOE believes the information provided herein will resolve Observation 2. Information to close out Observation 1 will be provided by DOE as soon as the required action is completed and verified.

Should you have any questions, please contact Sharon Skuchko of my office at (202) 586-4590.

Sincerely,



Linda J. Desell, Acting Chief
Regulatory Integration Branch
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cc:

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