

TV/OBS 91-S3

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MAR 14 1991

Mr. Dwight E. Shelor, Acting Associate Director
for Systems and Compliance
Office of Civilian Radioactive Waste Management
U. S. Department of Energy, RW 30
Washington, D.C. 20585

Dear Mr. Shelor:

SUBJECT: OBSERVATION REPORT NO. 91-S3 ON QUALITY ASSURANCE SURVEILLANCE
YMP-SR-91-008 OF THE LOS ALAMOS NATIONAL LABORATORY PROGRAM

I am transmitting the U. S. Nuclear Regulatory Commission (NRC) Surveillance Observation Report No. 91-S3 for the U. S. Department of Energy (DOE)/Yucca Mountain Site Characterization Project Office (YMPO) Quality Assurance (QA) Surveillance No. YMP-SR-91-008 of the Los Alamos National Laboratory (LANL) QA program conducted in Los Alamos, New Mexico, on February 25-28, 1991. A member of the NRC staff participated as an observer on this surveillance.

The NRC staff observed and evaluated the DOE/YMPO QA surveillance to gain confidence that DOE and LANL are properly implementing the requirements of their QA program by assessing the effectiveness of the DOE/YMPO surveillance and determining the adequacy of the LANL QA program in the areas surveilled. The staff's evaluation is based on direct observations of the surveillance team members, discussions with the surveillance team and LANL staff, and reviews of pertinent QA and technical records relating to corrective actions and procedural implementation.

The scope of this surveillance was limited to procedural implementation. No assessment of technical adequacy and qualification of any of the technical documents (technical procedures and laboratory and/or field data) was made during the surveillance.

The staff observer found the DOE/YMPO surveillance of the LANL QA program useful and effective. The surveillance team seemed well prepared and was familiar with the LANL QA Plan and the relevant QA procedures being implemented. Their checklists for this surveillance were well prepared and utilized in determining the adequacy of procedural controls and status of procedural implementation of the LANL QA program under the Code of Federal Regulations Title 10 Part 50, Appendix B, Criteria 2, 6, 16, and 17.

The NRC staff agrees with the DOE/YMPO surveillance team's preliminary conclusion that the LANL QA program provides adequate procedural controls and procedural implementation under the criteria surveilled. In addition, the

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staff agrees with the surveillance team's evaluation that LANL is closing out deficiencies identified during previous audits and surveillances in a satisfactory manner.

If you have any questions concerning this report, please contact Tilak Verma of my staff at (301) 492-3465 or FTS 492-3465.

Sincerely,

/s/ by Joseph Holonich
 for John J. Linehan, Acting Director
 Repository Licensing and Quality
 Assurance Project Directorate
 Division of High-Level Waste Management
 Office of Nuclear Material Safety
 and Safeguards

Enclosure: As Stated

- cc: R. Loux, State of Nevada
- C. Gertz, DOE/NV
- S. Bradhurst, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
- D. Weigel, GAO
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SURVEILLANCE OBSERVATION REPORT NO. 91-S3

1.0 INTRODUCTION

The Los Alamos National Laboratory (LANL), a participant in the Yucca Mountain Site Characterization Project (YMP), is responsible for conducting radionuclide migration, geochemical, mineralogic, and petrologic investigations, and is the lead organization for the coordination and scheduling of the site characterization activities in the Exploratory Shaft Facility (ESF).

From February 25-28, 1991, the U.S. Department of Energy (DOE)/Yucca Mountain Site Characterization Project Office (YMPO) conducted a quality assurance (QA) surveillance (YMP-SR-91-008) of the LANL YMP QA program at Los Alamos, New Mexico. This surveillance was conducted in accordance with the YMPO Quality Management Procedure (QMP)-18-02, Revision 2, "Surveillance." A member of the U. S. Nuclear Regulatory Commission (NRC) staff participated in the surveillance as an observer. This report documents the staff's assessment of the effectiveness of the DOE/YMPO surveillance, the adequacy of the LANL QA program procedural controls, and the status of their implementation under Criteria 2, 6, 16, and 17 of the Code of Federal Regulations Title 10, Part 50, Appendix B.

2.0 PURPOSE

This DOE/YMPO surveillance evaluated the adequacy of procedural controls and the status of their implementation under selected program elements of the LANL QA program. The staff's purpose in observing this surveillance was to gain confidence that the DOE and its contractors are properly implementing the requirements of their QA program by assessing the effectiveness of the DOE/YMPO surveillance and determining the adequacy of the LANL QA program in the areas surveilled.

3.0 SCOPE

The DOE/YMPO surveillance team selected Criteria 2, 6, 16 and 17 requirements from the LANL QA Program Plan (QAPP) for review and assessment of adequacy of procedural controls and status of procedural implementation. All the procedures and activities associated with the above criteria were reviewed. The scope of this surveillance did not include any review of the technical adequacy and qualification of the technical products and activities such as technical procedures, laboratory notebooks and data, or field notebooks and data.

4.0 SURVEILLANCE PARTICIPANTS

DOE/YMPO

Donald J. Harris, HARZA, Team Leader
Kenneth T. McFall, Science Applications International Corporation, Team Member
Robert B. Constable, DOE, Team Member

NRC

Tilak R. Verma, Observer

5.0 SURVEILLANCE SUMMARY RESULTS

The DOE/YMPO surveillance team conducted a detailed examination and review of the LANL records, logs and documents to assess compliance with the procedural requirements. The team interviewed several LANL and contractor personnel to assess their knowledge of relevant QA requirements and applicable implementing procedures under each criterion surveilled. Adequacy of controls and status of implementation for selected procedures were assessed and documented on the checklist for each of the criteria surveilled. Verified corrective actions taken by the LANL to close out previously identified deficiencies were reviewed for the timeliness of the actions taken and for effectiveness in improving the LANL QA program.

The surveillance team concluded that the procedural controls under Criteria 2, 6, 16, and 17 are adequate and their procedural implementation is satisfactory. The surveillance team did not identify any deficiency in the procedural implementation of the criteria surveilled. The surveillance team determined that LANL is closing out deficiencies identified during previous audits and surveillances in a satisfactory manner. No assessment of the effectiveness of implementation for these surveilled elements of the LANL QA program was made by the team. A recommendation that LANL auditors should clearly specify what needs to be corrected and the auditee clearly specify how it needs to be corrected in dispositioning Deficiency Reports (DRs) was made by the surveillance team.

6.0 LANL AND CONTRACTOR PERSONNEL CONTACTED DURING THE SURVEILLANCE

L. Bolivar	QA Project Leader, LANL
G. P. Rand	QA Support (QAS), Los Alamos Technical Associates (LATA)
G. M. Gainer	QAS, LATA
J. L. Day	QAC, LATA
M. Clevenger	QA Liaison, LANL
D. L. Williams	QAS, LATA
C. L. Chavez	QAS, LATA
L. A. Sanders	QAS, LATA

7.0 NRC CONCLUSIONS

The staff observer found the DOE/YMPO surveillance of the LANL QA program useful and effective. The DOE/YMPO surveillance team was well prepared and was familiar with the LANL QAPP requirements and relevant implementing procedures for the areas surveilled. Their checklists for this surveillance were well prepared and utilized in determining the adequacy of procedural controls under Criteria 2, 6, 16, and 17 and for assessing the status completeness and implementation of all the applicable procedures under these criteria. The team was thorough and professional in conducting the surveillance.

The NRC staff agrees with the DOE/YMPO surveillance team's preliminary conclusions that the LANL QA program provides adequate procedural controls and that the procedural implementation of the procedures under the criteria surveilled is also adequate. In addition, the staff was satisfied that LANL is closing out deficiencies identified during previous audits and surveillances in a satisfactory manner. The staff also agrees with the surveillance team's recommendation for specifically defining the corrective actions in dispositioning of DRs.