



Department of Energy
Washington, DC 20585

AUG 01 1991

Mr. 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
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Linehan:

As requested by your letter of October 24, 1990 (Linehan to Shelor), this letter is to notify you that the remaining exceptions, "Software Quality Assurance (QA) Program," "Calibration," and "Effectiveness Determinations," relative to the Office of Civilian Radioactive Waste Management (OCRWM) acceptance of the Technical & Management Support Services (T&MSS) QA Program, based on our letter of September 12, 1990 (Stein to Browning), have been addressed. The following information addresses the resolution of these exceptions:

Software QA Program

The T&MSS Software Quality Assurance Plan (SQAP) was initially approved by OCRWM on May 10, 1991, and revision 1 of the T&MSS SQAP was approved on June 19, 1991 (letter, Horton to Nelson, dated June 27, 1991). The T&MSS implementing procedures for the SQAP were made effective on June 28, 1991. These items completed the T&MSS actions necessary to provide a Software QA Program to cover its quality-related computer software activities.

In related actions, Standard Deficiency Report 449, which identified the fact that T&MSS software-related activities were being conducted without procedures, has been closed. It was closed based on the completion and satisfactory verification of remedial actions and actions taken to prevent recurrence.

Calibration

T&MSS Quality Finding Reports 90-013, 90-014, and 90-015, related to this item, have been closed. In addition, Corrective Action Request (CAR), YM-91-063, which was issued during a recent Office of Quality Assurance (OQA) audit of T&MSS (audit number 91-06) to document inaccurate information on the Measurement and Test Equipment list, has been closed by OQA. It was closed based on the resolution and completion of corrective action and satisfactory verification by OQA of this action.

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Effectiveness Determinations

OQA completed QA Audit Yucca Mountain Site Characterization Project (YMP) 91-06 of the T&MSS QA Program on June 21, 1991. As a result of this audit, three of the six QA Program criteria previously found indeterminate were found to be effective. Of these six, criteria 11, 19, and 20 were found to be indeterminate only due to the lack of activity for those areas. Criterion four was found to be marginally effective, but not significantly impacting implementation or preventing continuation of work. In addition, Criterion 12 was found to be ineffective and CAR YM-91-063 was generated to identify the deficiencies in this area; however, it has since been closed, as discussed previously under "Calibration."

It is understood that effectiveness determinations are dependent on the amount of actual program implementation for a given QA program criteria and are subject to change from audit to audit. As discussed previously for this exception, corrective action has been completed for identified deficiencies and the overall summary by the audit team was that this participant is satisfactorily implementing an effective QA program. Therefore, it is the position of OQA that this exception is adequately resolved. Furthermore, it is inherent to the implementation of QA programs to provide corrections when QA program criteria are found not to be effective, thereby adding assurance that effectiveness of QA program criteria are maintained.

Based on this information, the OCRWM OQA concludes that the T&MSS QA Program is acceptable for implementation of new site characterization activities and other quality-related activities for YMP, with no exceptions.

This information is transmitted to the U.S. Nuclear Regulatory Commission for its review and unconditional acceptance of the T&MSS QA Program. Should you have any questions, please contact Sharon Skuchko of my office at (202) 586-4590.

Sincerely,



Dwight E. Shelor
Associate Director for
Systems and Compliance
Office of Civilian Radioactive
Waste Management

cc:

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