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MEMORANDUM

TO: Distribution

FROM: Susan W. Zimmerman, SWZ
NWPO QA Manager

DATE: September 9, 1991

SUBJECT: State Observations of the DOE QA Audit of Sandia National Laboratories

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On August 19-23, 1991, I attended, as the State of Nevada observer, the DOE QA audit of Sandia National Laboratories. This memo is to relate the State's comments regarding this audit.

The Audit Process

The audit was performed well and in a professional manner. Activities were fairly well organized with little waiting for access to the right person. The auditors and observers had more freedom this year to move around without escorts. I was able to observe more of the audit without being under guard.

The SNL Audit Program

Sandia's QA program has matured nicely over the years and most of it appears to be in order. The findings discovered during this audit were, for the main part, not significant and most were easily rectified during the course of the audit. The only area of real concern was the continuing problem of issuing audit reports and the findings according to the time frame in the procedure and the QAPP. This has been a problem for the past few years. A related concern is the fact that the Project Office had accepted and verified corrective action by SNL to correct and prevent recurrence of this problem, but the problem has persisted.

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ADD: Ken Hooks 1 Ltr.

One other area of concern to the State is an observed attitude of some of the Sandia management and QA staff involving non-compliance with their procedures. There were a few instances where an activity did not comply with the controlling SNL procedure and the persons involved knew that they were not complying with the procedure. They had good reasons not to comply with the procedure. These instances were not of major significance, but the attitude by SNL was that they knew they weren't complying, they had logical reasons not to comply with the procedure, and, because they knew they weren't complying and had good reasons, then they did not need to document what they had actually done. It is a standard QA practice that if, in certain instances, you do not follow your procedure for logical reasons, then all you need to do is to document what you actually did and file it. The NRC has stated time and time again that this is an acceptable practice to give a QA program necessary flexibility. As I said, the instances weren't of major significance, but the attitude was of concern. Sandia has made great progress in implementing their QA program and in handling QA audits. Changing the above attitude will only enhance the program.

Distribution

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