## OCT 2 3 1991

Mr. John P. Roberts, 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. Roberts:

SUBJECT: OBSERVATION AUDIT OF OFFICE OF ENVIRONMENTAL RESTORATION AND WASTE

MANAGEMENT, WASTE VITRIFICATION BRANCH

I am transmitting the U.S. Nuclear Regulatory Commission (NRC) Observation Audit Report No. 91-13 for the U.S. Department of Energy (DOE)/Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance (QA) Audit No. 91-003 of the DOE Office of Environmental Restoration and Waste Management (EM) Waste Vitrification Branch (EM-343) conducted at Germantown, Maryland from August 26-30, 1991. The NRC staff evaluated the OCRWM QA audit to gain confidence that OCRWM and EM-343 are properly implementing the requirements of their QA programs. The NRC staff based its evaluation of the OCRWM audit process and the EM-343 QA program on direct observations of the auditors, discussions with the audit team and EM-343 personnel, and reviews of the pertinent audit information (e.g., audit plan, checklists, and EM-343 documents).

The NRC staff has determined that OCRWM Audit No. 91-003 of EM-343 was effective for the limited amount of work being conducted under the EM-343 QA program. The audit was conducted in a professional manner. The audit team was well qualified in the QA discipline, and their assignments and checklist items were adequately described in the audit plan.

The NRC staff agrees with the audit team's preliminary findings that EM-343 has an inadequate QA program for most of the areas that were audited, and the EM-343 QA program, for the most part, has insufficient controls in place to perform work related to the overview of site field offices vitrification projects. The NRC staff also agrees with the OCRWM audit team's conclusion that there was ineffective implementation of the EM-343 QA program in most areas audited by the audit team. In other areas audited, there has been minimal activity, therefore, adequacy of implementation in these areas was indeterminate.

WM-11 102.7 DH16 OCRWM must closely monitor the EM-343 program to ensure that adequate procedural controls are developed and future implementation is carried out in an adequate manner. The NRC staff expects to participate in this monitoring as observers and may perform its own independent audit at a later date to assess the adequacy of the EM-343 QA program.

A written response to this letter or the enclosed report is not required. If you have any questions, please call John Buckley on (301)/FTS 492-0513.

Sincerely,

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
- P. Niedzielski-Eichner, Nye County, NV
- C. Thistlethwaite, Inyo County, CA
- V. Poe, Mineral County, NV
- F. Sperry, White Pine County, NV

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:10/09/91

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Date: 10/09/91

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Mr. Dwight E. Shelor

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