



**AGENCY FOR NUCLEAR PROJECTS
NUCLEAR WASTE PROJECT OFFICE**

Capitol Complex
Carson City, Nevada 89710
Telephone: (702) 687-3744
Fax: (702) 687-5277

MEMORANDUM

TO: Distribution

FROM: Susan Zimmerman *SUZ*
NWPO QA Manager

DATE: November 8, 1991

SUBJECT: State of Nevada Observations on the DOE Internal Quality Assurance Audit-OCRWM Headquarters, October 15-18, 1991

This memo is to transmit the State of Nevada Nuclear Waste Project Office observations on the internal DOE QA audit of OCRWM headquarters. I attended this audit as the State observer.

AUDIT PROCESS

The audit went better this year than last year's audit at least in the respect that there were no observed instances of the auditors answering the questions for the person being audited. The timing for this audit was appropriate, but the length of time for the audit (four days instead of five) was a bit short. The audit team, given the short time frame, for the most part, did an adequate job and seemed prepared for the audit.

THE AUDITED PROGRAM

The OCRWM headquarters QA program appears to have improved since last year's audit; of course, that's the only direction it could have gone. There are, however, still some concerns about the program and its implementation at headquarters. There was a noticeable lack of management involvement at this year's audit. There was no management presentation at the pre-audit conference and on only one occasion did management representatives other than the QA organization representatives attend the daily management briefings. Hopefully, this does not represent an attitude by

management that, because they "passed" last year's audit, then the QA program is now the QA division's responsibility. Another concern noted was the numerous instances of the headquarter staff not following the established procedures and, in quite a few of these instances, knowing they weren't following the procedures, but not documenting any justification. After all the hysteria about QA programs being too inflexible, now, instead of taking advantage of the flexibility in the program, people are apparently just ignoring the procedures. I do commend the audit team leader and the Director, Quality Assurance for acknowledging the problem with a generic CAR for procedural noncompliance.

One incident during the audit did cause me great concern. This was the attitude and apparent lack of understanding of the QA program of the Acting Associate Director for Systems and Compliance. At a morning management briefing (this was the one instance where line management attended this meeting), the audit team leader discussed a CAR written against the review process for the Physical Systems Requirements: Store Waste Document, Rev. 0. This CAR dealt with the reviewers of this document not following the procedure's review criteria. The Acting Associate Director was adamant that his group did not deserve this CAR, the problem was wider than just in his group, he couldn't tell those other departments how to do their jobs, and he didn't want to be responsible for the corrective action for this CAR, even though it was his department that initiated the review of the document. This argument went on for at least 20 minutes. Someone needs to explain to this person how a CAR and any necessary corrective action works.

DOE OCRWM headquarters needs to continue working on making the QA program everybody's program. Progress has been made, but efforts need to continue from the top down.

Distribution

Ken Hooks, QA Project Manager
Division of High-Level Waste Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Don Horton
Office of Civilian Radioactive Waste Management
Director, Quality Assurance
U.S. Department of Energy
Washington, D.C. 20585

Tom Rodgers
CER Corporation
2500 Wilson Boulevard
Suite 202
Arlington, Virginia 22201