

NOV 13 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 THE U.S. DEPARTMENT OF ENERGY (DOE) OFFICE OF
CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM)

This letter transmits the U.S. Nuclear Regulatory Commission (NRC) Observation Audit Report No. 92-01 for the OCRWM Headquarters (HQ) Quality Assurance (QA) Internal Audit No. HQ-92-001 of HQ quality-affecting activities and Yucca Mountain Site Characterization Project Office (YMPO) Quality Assurance Division oversight activities conducted in Washington, D.C., and Las Vegas, Nevada, from October 15-18, 1991. The NRC staff evaluated the audit to gain confidence that HQ is properly implementing the requirements of the OCRWM QA program. The NRC staff based its evaluation of the QA program on direct observations of the auditors, discussions with the audit team and HQ personnel, and reviews of the pertinent audit information (e.g., audit plan, checklists, and OCRWM documents).

The NRC staff has determined that Internal Audit No. HQ-92-001 was useful and effective for the limited amount of work being conducted under the OCRWM HQ QA program. The audit was conducted in a professional manner and the programmatic portions of the audit were effective and well integrated. The audit team was well prepared and its checklist items were adequately described in the audit plan.

The NRC staff agrees with the preliminary audit team findings that OCRWM HQ has an adequate QA program for the programmatic elements that were audited, with the exception of Criteria 2, 3, 4, and 7. Criteria 2, 4, and 7 are marginally effective and Criterion 3 is ineffective. Criterion 3, "Design Control," which the HQ audit team identified as ineffective, is of particular concern to the NRC staff because of its Site Characterization Analysis objection. The NRC also agrees with the audit team that OCRWM HQ has made considerable progress from last year in implementing its QA program.

OCRWM management must closely monitor the OCRWM HQ QA program to ensure that 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 and effectiveness of the OCRWM QA program.

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Mr. John P. Roberts

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A written response to this letter or the enclosed report is not required. If you have any questions, please call William Belke on (301)/FTS 492-0445.

Sincerely,

(Original Signed by

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
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