

MINUTES OF THE NOVEMBER 14, 1991, QUALITY ASSURANCE MEETING

A meeting of the staff of the U.S. Nuclear Regulatory Commission (NRC) and representatives of the U.S. Department of Energy (DOE) Office of Civilian Radioactive Waste Management (OCRWM) and the State of Nevada, to discuss items of mutual interest with regard to quality assurance (QA), was held at the NRC Headquarters, Rockville, MD on November 14, 1991. An attendance list is included as Attachment 1. No affected units of local government attended this meeting.

At the meeting, DOE presented information on the following topics: (1) status of Management and Operations Contractor (M&O) quality affecting activities and transition update; (2) audit and surveillance schedules; and (3) status of QA procedures consolidation. The NRC staff presented observation summaries of the U.S. Geological Survey (USGS) audit (YMP-91-05), Science Applications International Corporation (SAIC)/Technical & Management Support Services (T&MSS) audit (YMP-91-06), Raytheon Services Nevada (RSN) audit (YMP-91-04), Sandia National Laboratories (SNL) audit (YMP-91-07), DOE Office of Environmental Restoration and Waste Management (EM) audit (YMP-91-03) and the RSN surveillance (YMP-SR-91-26). In addition, the NRC staff also presented the status of the QA Open Items.

The meeting began with introductory remarks by the participants. The NRC presented the new Division of High-Level Waste Management Organizational Structure (see Attachment 2). Following the introduction, the DOE presented information on the M&O quality affecting activities and the QA program transition update (see Attachment 3). OCRWM has approved the M&O Quality Assurance Requirements Document but does not plan to submit it to the NRC for review or acceptance. DOE stated that the M&O has not yet done any work under the M&O QA program. However, the M&O is doing a limited amount of direct support work under the OCRWM QA program. In addition, the M&O continues to do non-quality affecting work with regard to the Monitored Retrievable Storage (MRS) Conceptual Design. The M&O has scheduled internal readiness reviews in December 1991 and January 1992 for the QA program controls applicable to Mined Geologic Disposal Site/Exploratory Shaft Facility (MGDS/ESF) integration and MRS conceptual design respectively. Based on the DOE presentation, the NRC asked for the following items; (1) a copy of the M&O readiness review procedure; (2) a schedule of milestones for M&O transition activities; and (3) information copies of the OCRWM surveillance reports of M&O activities.

Next, DOE presented information on the audit and surveillance schedules. DOE plans to review the current audit schedule and re-examine the need for audits with very limited scopes. The NRC did not object to the possibility of cancelling audits provided the rationale is documented well in advance.

The NRC provided its observations (see Attachment 4) of the OCRWM audits of USGS (YMP-91-05), SAIC/T&MSS (YMP-91-06), RSN (YMP-91-04), SNL (YMP-91-07), EM (YMP-91-03) and surveillance of RSN (YMP-SR-91-26). The NRC staff stated that the audit/surveillance process was adequate for all the audits and the surveillance. The QA programs reviewed were adequate except for EM, which both the OCRWM audit team and the NRC staff found to be generally inadequate.

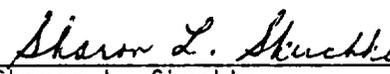
The NRC then gave a presentation on the status of QA Open Items (see Attachment 5). The status of Open Items 3-90, "NNWSI Core Handling Procedures" remained unchanged from the June 1991 QA meeting. DOE indicated that a letter is forthcoming regarding core handling procedures. It is anticipated that this item can then be closed. Regarding Open Item 4-90, "Qualified QA Program," DOE indicated that a letter will be transmitted to the NRC next week which responds to NRC questions on RSN Quality Assurance Requirements Document (QARD). NRC noted that it will not issue an acceptance letter for the OCRWM QA program until the DOE and NRC audit reports for OCRWM Headquarters (HQ) and Yucca Mountain Site Characterization Project Office (YMPO) are issued. Open Item 8-90, "SCA Comments" remains open. There was mutual agreement that Open Items 4-90 and 8-90 should be combined into one new Open Item since they are so closely related. Items 4-90 and 8-90 will then be closed. The status of Open Item 10-90 remains unchanged since the last audit. Open Items 12-90 and 1-91, "DOE QARD/QAPD Acceptance Letter" will be closed pending transmittal of an acceptance letter to DOE. The acceptance letter is currently in the management approval stage.

Although the meeting agenda included a presentation by OCRWM on "Changes to the QARD/QAPD and Procedures," DOE was not prepared to discuss this topic in detail and asked that it be postponed until the next meeting. However, it was mentioned that OCRWM has completed Phase I of the procedure consolidation effort. Phase II will begin the week of November 18, 1991.

The NRC then invited the State of Nevada to present items of concern to the State. Since the State representative had no comments at this time, the NRC invited closing remarks from the meeting participants. A tentative date of February 20, 1992 was proposed for the next DOE/NRC QA meeting. The meeting was then adjourned.



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NRC/DOE QA MEETING 11/14/91
November 14, 1991

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DIVISION OF HIGH-LEVEL WASTE MANAGEMENT ORGANIZATIONAL STRUCTURE

**DIVISION OF HIGH-LEVEL
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**HYDROLOGY
AND
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Hydrologic Transport Section	Repository Performance Assessment Section
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**REPOSITORY LICENSING
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Joseph J. Holonich,
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Systems Engineering and Special Projects Section	Quality Assurance Section	Senior Project Managers/ On-Site Represent- atives
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Ronald L. Ballard, Chief

Materials Section	Geotechnical Engineering Section	Geology- Geophysics Section
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M&O Near Term Quality Affecting Activities

- **Readiness Review for M&O QA Program (Phased Readiness Plan)**
- **Technical Baseline (OCRWM QA Program)**
- **MRS Conceptual Design (Baselined Interim Design Approach - M&O QA Program)**
- **Transportation Casks Initiative (M&O QA Program)**
- **Site Characterization Technical Direction and Integration (OCRWM QA Program)**
- **MGDS/ESF Integration (M&O QA Program)**
- **Records Management Transition (M&O QA Program)**

1.0 INTRODUCTION

From May 20 through 24, 1991, the U.S. Nuclear Regulatory Commission (NRC) staff observed the U.S. Department of Energy (DOE)/Yucca Mountain Site Characterization Project Office (YMPO) Quality Assurance (QA) Audit No. 91-05 of the U.S. Geological Survey (USGS) which was conducted in Denver, Colorado. The USGS, a participant in the Yucca Mountain Site Characterization Project (YMP), is responsible for site characterization activities in the areas of hydrology, geophysics, seismology, geology and geochemistry investigations. Work in these areas is ongoing at the Nevada Test Site (NTS) and the USGS offices in Denver, Colorado; Menlo Park, California; and Las Vegas, Nevada. This report addresses the NRC staff's assessment of the effectiveness of the DOE/YMPO audit and the procedural adequacy and effectiveness of implementation in both programmatic and technical areas under the USGS QA program.

2.0 OBJECTIVES

The objective of the DOE/YMPO audit was to determine the adequacy of procedural controls and effectiveness of implementation of the USGS QA program in meeting the applicable requirements of the Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance Requirements Document (QARD), Revision 4 and the USGS Quality Assurance Program Plan (YMP-USGS-QAPP-01) Revision 5. The NRC staff's objective was to gain confidence that DOE and USGS are properly implementing the requirements of their QA programs by evaluating the effectiveness of the DOE/YMPO audit process and determining whether the USGS QA program is in accordance with the applicable requirements of the OCRWM QARD and the USGS QAPP.

3.0 SUMMARY AND CONCLUSIONS

The NRC staff based its evaluation of the DOE/YMPO audit process and the USGS QA program on direct observation of and discussions with the audit team, discussions with USGS YMP personnel and reviews of the pertinent audit information (e.g., audit plan, checklists and USGS documents).

The audit was well organized with minimal logistic delays. The daily caucuses provided a good exchange of information between the programmatic and technical concerns of the auditors and observers. Concerns raised during the caucuses were adequately addressed during the following day. The Audit Team Leader was thorough in developing a complete understanding of any identified discrepancies to be able to adequately advise USGS management personnel during daily meetings. The audit process, including organization, performance, and reporting, provided appropriate information to adequately assess implementation of the USGS QAPP and associated procedures during USGS performance of YMP activities.

The NRC staff found that, overall, DOE/YMPO Audit No. 90-05 of the USGS was useful and effective. The programmatic and technical portions of the audit, including their subsequent integration, were effective. The audit team was well qualified in the QA and technical disciplines, and conducted the audit in a professional manner. The audit team's assignments and checklist items were adequately described in the audit plan. The audit team, in general, made an effective use of its checklists in determining the adequacy of procedural controls and effectiveness of implementation of the USGS QA program.

The NRC staff agrees with the preliminary audit team findings that the USGS QA program, in general, provides adequate procedural controls, and was effectively implemented in the programmatic and technical areas reviewed during this audit. The NRC staff also agrees with the audit team's conclusions that the USGS QA program has improved noticeably in the last two years and that there is evidence of strong management commitment and involvement in implementation of the USGS QA program. The USGS management seemed knowledgeable of the QA requirements for the YMP site characterization work.

The NRC staff also agrees with the audit team's preliminary conclusion that the effectiveness of the USGS QA program implementation under Criterion 12 could not be determined in Denver, Colorado, primarily due to unavailability of the measuring and test equipment that is being used for site investigations. This equipment is available at the NTS, and a DOE/YMPO surveillance was conducted during the week of June 10-14, 1991, to assess the effectiveness of implementation under this criterion.

DOE must closely monitor the USGS QA program to ensure that future implementation is carried out in an acceptable manner. The NRC staff expects to observe this monitoring and may perform its own independent audit at a later date to determine the adequacy and effectiveness of the USGS QA program.

5.10 Summary of NRC Staff Findings

(a) Observations

The NRC staff did not identify any observations relating to deficiencies in either the DOE/YMPO audit process or the USGS QA program.

(b) Weaknesses

- o Tardiness to complete the required management assessment for each year since the beginning of the implementation of the YMP USG-QA program (see Section 5.3(b)).

- o QMP 5.01 Revision 4 deals with the preparation, review and acceptance of technical procedures for the YMP USGS site characterization activities. The procedure is not clear in the areas of qualifications of the reviewers, and the documentation of criteria for selecting qualified reviewers (see Section 5.3(d)).

(c) Good Practices

- o Strong management commitment and involvement in making the USGS QA program effective.
- o The USGS has assigned personnel experienced in QA to various technical groups to assist in the implementation of the QA program.
- o Programmatic and technical portions of the audit were well integrated.

SAIC Audit (6/17-21/91)

1.0 INTRODUCTION

From June 17 through 21, 1991, members of the U.S. Nuclear Regulatory Commission (NRC) staff participated as observers on the U.S. Department of Energy (DOE)/Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance (QA) Audit No. 91-06 of Science Applications International Corporation (SAIC)/Technical & Management Support Services (T&MSS) in Las Vegas, Nevada, and at the Nevada Test Site (NTS). SAIC/T&MSS, a participant in the Yucca Mountain Site Characterization Project (YMP), is responsible for the environmental and radiological monitoring activities for the YMP. This report addresses the NRC staff's assessment of the effectiveness of the OCRWM audit and the procedural adequacy and effectiveness of implementation in both programmatic and technical areas of the SAIC/T&MSS QA program.

2.0 OBJECTIVES

The objective of the OCRWM audit was to determine the effectiveness of the SAIC/T&MSS QA program in meeting the applicable requirements of the OCRWM Quality Assurance Requirements Document (QARD), DOE/RW-0214, Revision 4, for the YMP. The NRC staff's objective was to gain confidence that OCRWM and SAIC/T&MSS are properly implementing the requirements of their QA programs by evaluating the effectiveness of the OCRWM audit process and determining whether the SAIC/T&MSS QA program is in accordance with the applicable requirements of the OCRWM QARD and Code of Federal Regulations, Title 10, (10 CFR) Part 50, Appendix B.

3.0 SUMMARY AND CONCLUSIONS

The NRC staff based its evaluation of the OCRWM audit process and the SAIC/T&MSS QA program on direct observations of the auditors, discussions with the audit team and SAIC/T&MSS personnel, and reviews of the pertinent audit information (e.g., audit plan, checklists, and SAIC/T&MSS documents). Although there was a limited amount of work being conducted by SAIC/T&MSS under the QA program, the NRC staff has determined that, overall, OCRWM Audit No. 91-06 of SAIC/T&MSS was of appropriate scope and achieved its purpose of determining the adequacy and effectiveness of implementation of programmatic and technical activities conducted under the SAIC/T&MSS QA program. The audit observed was conducted in a professional manner, and the programmatic and technical portions of the audit were effective and well integrated. The audit team was well qualified in the QA discipline, and their assignment and checklist items were adequately described in the audit plan.

The audit was well organized and was run with minimal logistic delays. The Audit Team Leader (ATL) was well prepared and had a good knowledge of the SAIC/T&MSS QA program and the applicable OCRWM QA requirements.

5.10 Summary of NRC Staff Findings

(a) Observations

The NRC staff did not identify any observations relating to deficiencies in either the DOE/OCRWM audit process or the SAIC/T&MSS QA program.

(b) Weaknesses

The NRC staff did not identify any weaknesses relating to either the OCRWM audit process or the SAIC QA program.

(c) Good Practices

The audit team was well prepared and conducted a thorough audit in a professional manner.

There was good coordination of the programmatic and technical reviews and evaluations.

RSN Audit (7/29 - 8/1/91)

1.0 INTRODUCTION

From July 29 - August 1, 1991, the U.S. Nuclear Regulatory Commission (NRC) staff observed the U.S. Department of Energy (DOE)/Yucca Mountain Site Characterization Project Office (YMPO) Quality Assurance (QA) Audit No. YMP-91-04 of Raytheon Services Nevada (RSN) conducted in Las Vegas, Nevada. RSN, a participant in the Yucca Mountain Site Characterization Project (YMP), is responsible for the design and inspection of the Exploratory Studies Facility (ESF), both surface and subsurface. RSN also provides support for the Surface Based Testing Program in the form of drilling engineering, materials testing, and non-destructive examination.

This report addresses the effectiveness of the DOE/YMPO audit and, to a lesser extent, the adequacy of the RSN QA program.

2.0 OBJECTIVES

The objectives of the DOE/YMPO audit were to evaluate the implementation and effectiveness of the RSN QA program. The NRC staff's objective was to gain confidence that DOE and RSN are properly implementing the requirements of their QA programs by evaluating the effectiveness of the DOE audit and determining whether the RSN QA program is in accordance with the requirements of the DOE/Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance Requirements Document (QARD).

3.0 SUMMARY AND CONCLUSIONS

The NRC staff based its evaluation of the DOE/YMPO audit process and the RSN QA program on direct observations of the auditors, discussions with the audit team and RSN personnel, and reviews of pertinent audit information (e.g., the audit plan checklists, and RSN documents). The NRC staff has determined that DOE/YMPO QA Audit No. YMP-91-04 was useful and effective. The audit was well organized and conducted in a thorough and professional manner with minimal logistic delays. The audit team was well qualified in the QA discipline, and their assignments and checklist items were adequately described in the audit plan. The audit team did not include any technical specialists. Some technical areas were audited for compliance to procedural controls (i.e., computer software), but no evaluation was made of the technical adequacy of work products.

The NRC staff agrees with the preliminary DOE/YMPO audit team findings that the RSN QA program has adequate procedural controls in place, and that program implementation is adequate in eight of the thirteen areas audited. The other five areas were considered indeterminate due to a lack of quality affecting activities being conducted in these areas.

DOE/YMPO should monitor the RSN program to ensure that the seven preliminary deficiencies identified during this audit are corrected in a timely manner and future implementation is carried out in an effective manner. The NRC staff expects to participate in this monitoring as observers and may perform its own independent audits at a later date to assess the RSN QA program.

SUMMARY OF NRC STAFF FINDINGS

(a) Observations

The NRC staff did not identify any observations relating to deficiencies in either the audit process or the other elements of RSN QA program implementation.

(b) Weaknesses

The NRC staff did not identify any weaknesses relating to either the OCRWM audit process or the RSN QA program.

(c) Good Practices

The audit team was well prepared and conducted a thorough audit in a professional manner.

Personnel qualification records were well documented and accurate to facilitate reviews and audits.

RSN is adequately implementing that portion of their software program which controls the verification of software packages.

There is a strong commitment and support for an effective QA program at the management level. The Technical Project Officer at RSN has a good knowledge of the QA requirements and demonstrated a positive attitude toward an effective QA program.

SNL Audit (8/19-23/91)

1.0 INTRODUCTION

From August 19-23, 1991, the U.S. Nuclear Regulatory Commission (NRC) staff observed the U.S. Department of Energy (DOE)/Yucca Mountain Site Characterization Project Office (YMPO) Quality Assurance (QA) Audit No. 91-07 of Sandia National Laboratories (SNL) conducted in Albuquerque, New Mexico. SNL, a participant in the Yucca Mountain Site Characterization Project (YMP), is responsible for repository systems development; data management and analysis; systems performance assessment of the repository; conceptual design of the repository; determining the thermal and mechanical properties of the host rock; repository sealing performance requirements, materials evaluation, design, and testing; and providing assistance to other YMP participants in areas of specialized expertise.

This report addresses the effectiveness of the DOE/YMPO audit and, to a lesser extent, the adequacy of the SNL QA program.

2.0 OBJECTIVES

The objectives of the DOE/YMPO audit were to evaluate the implementation and effectiveness of the SNL QA program. The NRC staff's objective was to gain confidence that DOE and SNL are properly implementing the requirements of their QA programs by evaluating the effectiveness of the DOE audit and determining whether the SNL QA program is in accordance with the requirements of the DOE/Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance Requirements Document (QARD).

3.0 SUMMARY AND CONCLUSIONS

The NRC staff based its evaluation of the DOE/YMPO audit process and the SNL QA program on direct observations of the auditors, discussions with the audit team and SNL personnel, and reviews of pertinent audit information (e.g., the audit plan, checklists, and SNL documents). The NRC staff has determined that, overall, Audit No. 91-07 of SNL achieved its purpose of determining the effectiveness of the SNL QA program implementation for the areas that were audited. The audit was conducted in a professional manner. The audit team was well prepared, and the checklist items were adequately described in the audit plan.

The NRC staff agrees with the preliminary DOE/YMPO audit team findings that the SNL QA program was adequately implemented for the areas that were audited, with the exception of Criteria 12 and 18. Criterion 12 is indeterminate and Criterion 18 is marginally effective. The NRC also agrees with the DOE/YMPO audit team that SNL has made considerable progress from last year in implementing its QA program. SNL should initiate timely corrective actions for the weaknesses identified by the DOE/YMPO audit team.

5.10 Summary of NRC Staff Findings

(a) The NRC staff did not identify any Observations relating to deficiencies in either the DOE/YMPO audit process or the SNL QA program.

(b) Weaknesses

- o SDRs/CARs are being closed out by the YMPO without proper verification of the corrective action that was implemented. During this audit, two of the eight SDRs written from the last DOE/YMPO audit of SNL had the same condition noted by the auditors. One of the noted deficiencies was being considered for elevation to a Level 1 condition by the DOE/YMPO audit team leader. The NRC staff recommends that in the future, DOE devote more attention to verifying the accuracy of the corrective action implemented to close out audit findings to avoid recurring conditions (see Sections 5.3 (b) and 5.3 (f)).
- o At the entrance meeting, prior to the start of the audit, it would have been beneficial to have SNL present a brief overview of the work activities that have occurred since the previous DOE/YMPO audit.

(c) Good Practices

- o At the conclusion of the audit in the measuring and test equipment area, the DOE/YMPO auditor summarized what was reviewed and what the potential findings were. This brief summarization provided the auditee, auditor and observers the opportunity to understand there were no misunderstandings of what was audited, and assist in the accuracy of the audit report.
- o There is a strong commitment and support for an effective QA program from the SNL Technical Project Officer on down to the line organizations. In general, all SNL personnel were very receptive and sensitive to the audit team findings from the perspective of improving the SNL QA effort. The SNL QA Manager indicated all personnel had been instructed in the Total Quality Program and appeared supportive of the SNL QA program effort.

1.0 INTRODUCTION

From August 26 through 30, 1991, members of the U.S. Nuclear Regulatory Commission (NRC) staff participated as observers on 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) Vitrification Projects Branch (EM-343) in Germantown, Maryland. EM is responsible for the management and operation of facilities, operations, or site for storage, treatment or disposal of radioactive, hazardous, mixed and sanitary waste materials. Specifically, EM-343 is responsible for administration and overview of the site field offices to ensure the acceptability of high-level radioactive canistered waste forms. This report addresses the NRC staff's assessment of the effectiveness of the OCRWM audit and, to a lesser extent, the adequacy of the EM-343 QA program.

2.0 OBJECTIVES

The objective of the OCRWM audit was to determine the effectiveness of the EM-343 QA program in meeting the applicable requirements of the OCRWM Quality Assurance Requirements Document (QARD, DOE/RW-0214), Revision 4, for the Civilian Radioactive Waste Management Program. The NRC staff's objective was to gain confidence that OCRWM and EM-343 are properly implementing the requirements of their QA programs by evaluating the effectiveness of the OCRWM audit process and determining whether the EM-343 QA program is in accordance with the applicable requirements of the OCRWM QARD and Title 10 Code of Federal Regulations (10 CFR) Part 50, Appendix B.

3.0 SUMMARY AND CONCLUSIONS

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, overall, OCRWM Audit No. 91-003 of EM-343 was of appropriate scope and achieved its purpose of determining the adequacy and effectiveness of the EM-343 QA program. The audit of the criteria observed was conducted in a professional manner. The audit team was well qualified in the QA discipline, and their assignment 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.

5.8 Summary of NRC Staff Findings

(a) Observations

The NRC staff did not identify any observations relating to deficiencies in either DOE/DCRWM audit process or the EM QA program.

(b) Good Practices

The audit team was well prepared and conducted a thorough audit in a professional manner.

(c) Weaknesses

In several instances auditors expressed too much opinion on the philosophy of QA and on possible corrective actions for identified deficiencies. These discussions detracted from the overall efficiency of the audit.

As noted in Section 5.3(c) of this report, the NRC staff is concerned by the auditees attitude regarding compliance with the implementing procedures. This attitude was evident in the EM-343 staff as well as support contractors.

Although the audit rightly included the EM-343 support contractors, it appeared in many cases that the EM-343 staff relied too heavily on the contractors to answer auditors' questions. In many cases it seemed as though the EM-343 staff was not familiar with the procedural requirements and had to rely on the contractors to address the auditors' questions.

RSN Surveillance (9/18-20/91)

1.0 INTRODUCTION

Raytheon Services Nevada (RSN), a participant in the Yucca Mountain Site Characterization Project (YMP), is responsible for the Title I and II Design of surface and subsurface facilities, nondestructive testing, materials testing, field surveying, microfilming of YPM records and engineering support services.

On September 18-20, 1991, the U.S. Department of Energy (DOE)/Yucca Mountain Site Characterization Project Office (YMPO) conducted a quality assurance (QA) surveillance (YMP-SR-91-26) of the RSN YMP QA program in Las Vegas, NV. This surveillance was conducted in accordance with the YMPO Quality Assurance Procedure (QMP)-18-02, Revision 2, "Surveillance." A member of the U.S. Nuclear Regulatory Commission (NRC) staff participated in the surveillance as an observer. This report documents the staff's assessment of the effectiveness of the DOE/YMPO surveillance, the adequacy of the RSN program procedural controls, and the procedural implementation under Criteria 2, 3, 6 and 17 of the Code of Federal Regulations Title 10, Part 50, Appendix B.

2.0 PURPOSE

This DOE/YMPO surveillance evaluated the adequacy of procedural controls and their implementation under selected program elements of the RSN QA program. The staff's purpose in observing this surveillance was to gain confidence that the DOE and its contractors are properly implementing the requirements of their QA programs by assessing the effectiveness of the DOE/YMPO surveillance and determining the adequacy of the RSN QA program in the areas surveilled.

3.0 SCOPE

The DOE/YMPO auditors selected Criterion 2, "Quality Assurance Program," Criterion 3, "Scientific Investigation and Design Control," Criterion 6, "Document Control," and Criterion 17, "Quality Assurance Records," for review and assessment of the adequacy of procedural controls and implementation as related to the RSN Experimental Studies Facility (ESF) Title I design work. The scope of this surveillance did not include any review of the technical adequacy of technical products and activities.

7.0 NRC CONCLUSIONS

The staff observer found the DOE/YMPO surveillance of the RSN QA program to be useful and effective. The auditors were familiar with the RSN Quality Assurance Program Description and relevant implementing procedures for the areas surveilled. The auditors were thorough and professional in conducting the surveillance and asked pertinent questions necessary to obtain the required objective evidence.

Additional planning may have been beneficial prior to the surveillance. It was apparent at the surveillance kick-off meeting that the RSN personnel in attendance were not fully aware of what the scope of the surveillance was, how long it was to last, and what information would be reviewed. Also, RSN did not have a room pre-arranged for the auditors' use so audit time was spent looking for an empty office.

Although not required by QMP-18-02, "Surveillance", it would be beneficial for the observers to receive a copy of the surveillance notification letter and plan prior to the surveillance, and a copy of the checklist at the kickoff meeting. Due to a lack of this information, the NRC observer was unaware that the kickoff meeting had been postponed from 8:00am to 9:00am on September 18, that Criterion 6 had been added to the surveillance scope and that the surveillance would be extended from September 20 to September 23. In addition, a copy of the checklist was not immediately available to the observer which limited his effectiveness during the early stages of the surveillance.

In general, the NRC staff agrees with the DOE/YMPO auditors' preliminary conclusions that the RSN program has adequate procedural controls and procedural implementation for the areas surveilled.

(1)

*** BRACKETED PORTIONS INDICATE CHANGES RESULTING FROM
8/29/91 QA MEETING OR ADDED AS A RESULT OF NRC REVIEW
ACTIONS.

SUBJECT: STATUS OF NRC/DOE OPEN ITEMS - NOVEMBER 14, 1991

<u>ITEM</u>	<u>DESCRIPTION</u>	<u>STATUS</u>	<u>RECOMMENDATION FOR CLOSURE/REMARKS</u>
3-90	NNWSI Core Handling Procedures	Open	DOE submitted the Core Handling procedures to the NRC staff in a 8/11/89 transmittal (Gertz to Stein). The issues raised in the YMP Surveillance Report (YMP-SR-89-134) will need to be resolved before this item can be closed. NRC will determine acceptability of implementation and adequacy of procedures when they are issued in final form and subsequently implemented. At the 11/8/90 QA meeting, DOE indicated that based on the prototype drilling at Apache Leap, the procedures have been revised and should be submitted for NRC review and comment before the end of 1990. No change in status resulting from 1/18/91, 4/25/91, 6/25/91, or <u>8/29/91</u> QA meetings.

4-90

Qualified QA Program before start of new site characterization activities.

Open

DOE has made a commitment to having a qualified QA program before the start of new site characterization activities. However, this item remains open up until the the NRC staff accepts the DOE QA program as qualified for the start of new site characterization activities. At the 11/8/90 QA meeting, NRC provided a letter (Linehan to Shelor dated 10/24/90) which addresses the acceptance of (6) participant QA programs. The NRC accepted the QARD/QAPD 12/3/90 (see open item 12-90). Subsequent NRC letters of 1/18/91 & 3/11/91 state that the OCRWM QA program is acceptable only for new site characterization activities associated with Midway Valley Trenching and Calcite-Silica Activities. The 8/1/91 DOE transmittal of the Raytheon QA Program for NRC review and acceptance was performed and 10

comments were generated as a result of the NRC review. NRC discussed these comments with DOE on 10/22/91 and 11/6/91 and is waiting the formal DOE transmittal. NRC found the DOE 7/16/91 transmittal of Rev. 4 to the T&MSS (SAIC) QA program acceptable and issued the NRC Safety Evaluation to DOE 10/9/91.

8-90	SCA comments	Open	Responses provided to NRC 12/14/90; NRC comments issued to DOE 7/31/91; DOE 8/21/91 response to NRC comments under review.
10-90	Responses to NRC, Observation Audits		DOE should respond within 30 days after NRC Observation Audit Report transmittal. The DOE responses are to be reviewed and considered by NRC staff in accepting DOE QA programs. DOE should respond to the following NRC staff Observation Audit Report:
10.e	LLNL	Open	(1) Observation noted in the 7/31/91 NRC Obs. report: Changes made to the LLNL QA Program Plan w/o being furnished to NRC as previously agreed to by DOE.
12-90	DOE QARD/QAPD Acceptance Letter Dated 12/3/90	Open	DOE provided a response 8/21/91, to the (6) open items listed for the NRC review of the QARD/QAPD. NRC staff presently preparing acceptance letter for the QARD/QAPD.
1-91	NRC 4/15/91 letter accepting QARD/QAPD for MRS & Transport of Spent Fuel	Open	DOE provided a response 8/21/91, to the (5) comments listed for the NRC review of the QARD/QAPD pertaining to MRS & transport of spent fuel. NRC presently preparing acceptance letter for the QARD/QAPD.