

OCT 21 1992

Mr. John P. Roberts, Acting Associate Director
for Systems and Compliance
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1000 Independence Ave, SW
Washington, D.C. 20585

Dear Mr. Roberts:

SUBJECT: COMMENTS ON NUCLEAR WASTE MANAGEMENT SYSTEMS MANAGEMENT & OPERATING
CONTRACTOR QUALITY ASSURANCE PROGRAM DESCRIPTION

On April 22, 1992, the U.S. Department of Energy, Office of Civilian Radioactive Waste Management (OCRWM) transmitted (by letter from Desell to Holonich) the document titled "NWMS M&O Quality Assurance Program Description" (QAPD), Revision 2, to the U.S. Nuclear Regulatory Commission for information. On May 26, 1992, in response to NRC staff requests, OCRWM transmitted the Requirements Matrix (by letter from Desell to Holonich) which relates the QAPD to the OCRWM Quality Assurance Requirements Document (QARD).

After reviewing the QAPD against the requirements stated in the OCRWM QARD and the criteria contained in the NRC's "Review Plan for High-Level Waste Repository Quality Assurance Program Descriptions, Revision 2," the NRC verbally requested additional information in 32 areas. The State of Nevada's Quality Assurance (QA) Manager was invited to participate in this conversation but declined to do so. However, the NRC provided details of the information request to the State of Nevada's QA Manager in a subsequent conversation.

On August 27, 1992, DOE transmitted additional information in each of the areas in question to the NRC staff; the NRC staff transmitted this information to the State of Nevada and affected governments. Based on the information submitted to date, the NRC staff has the following comments:

1. Although it is stated in DOE's August 27, 1992, response package that the M&O is committed to the OCRWM QARD, there does not appear to be a similar definitive statement in the M&O QAPD QA Policy Statement or Introduction.
2. The enclosed list identifies five areas of the Management and Operating Contractor's (M&O) QAPD which DOE now believes must be revised to meet the requirements of the OCRWM QARD. If the M&O makes these proposed revisions to its QAPD along with adding a definitive commitment to the OCRWM QARD, the NRC staff's concerns regarding Revision 2 of the QAPD will be resolved.

The NRC staff will review the revised QAPD when it is submitted to confirm its acceptability.

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Mr. John P. Roberts

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Future revisions to the M&O QAPD will be reviewed by the NRC staff to assure that commitments previously accepted by the NRC staff are not lessened. If you have any questions please contact Ken Hooks of my staff at 301-504-2447.

Sincerely,

Original Signed by *Kenneth R. Hooks*

for

Joseph J. Holonich, 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
- T. J. Hickey, Nevada Legislative Committee
- C. Gertz, DOE/NV
- M. Murphy, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
- D. Weigel, GAO
- P. Niedzielski-Eichner, Nye County. NV
- B. Mettam, Inyo County, CA
- V. Poe, Mineral County, NV
- F. Sperry, White Pine County, NV
- R. Williams, Lander County, NV
- P. Goicoechea, Eureka County, NV
- L. Vaughan II, Esmeralda County, NV
- C. Shank, Churchill County, NV
- E. Holstein, Nye County, NV.

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CHANGES PROPOSED TO THE M&O QAPD TO MEET REQUIREMENTS OF OCRWM QARD

1. Section 1 - The M&O will include in its subsequent revision of the QAPD, an organization chart, or a text description, of its interface with OCRWM.
2. Section 1 - Revision 3 of the QAPD will require that the QAPD be approved by both the GM and QA Manager.
3. Section 3 - Revision 3 of the QAPD will contain a requirement to "analyze design changes to assure that change is required."
4. Section 6 - "In a timely manner" will be added to Revision 3 of Section 6.1.2e of the QAPD.
5. Section 18 - The discussion regarding the tracking system for audit findings will be expanded to address "prioritization" in Revision 3 of the QAPD.