



Department of Energy
Washington, DC 20585

NOV 12 1992

Mr. Joseph J. Holonich, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Holonich:

This letter is to notify the U.S. Nuclear Regulatory Commission (NRC) that Interim Change Notice (ICN) 4.2A to the U.S. Department of Energy (DOE) Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance Requirements Document (QARD), DOE/RW-0214, and ICN 3.2A to the Quality Assurance Program Description Document (QAPD), DOE/RW-0215, were effective on November 2, 1992. Copies of both ICNs are enclosed for your information.

ICNs 4.2A and 3.2A remove the OCRWM Quality Concerns Program (QCP) from the scope of the Quality Assurance Project (QAP). Effective November 2, 1992, the QCP no longer reports to the Office of Quality Assurance, but reports directly to the Director, OCRWM.

The decision for the change in the QCP direct-reporting requirement was based as follows:

- o A survey of the nuclear industry was conducted and, in a majority of the organizations, the system for reporting allegations of inadequate quality was not within the scope of the QAP;
- o There is no regulatory basis for the allegations program to be within the scope of the QAP. A system for addressing allegations of inadequate quality is required by the NRC Review Plan, Revision 2. However, the Review Plan does not require this system to be a responsibility of the Quality Assurance organization; and
- o Although the QCP was removed from the scope of the QAP, the QCP still exists and reports directly to the Director, OCRWM. Therefore, there is no degradation in the overall OCRWM Program, as agreed to by the NRC.

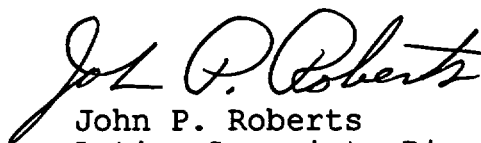
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If you have any questions in this regard, please contact either Robert Clark of the Office of Quality Assurance at (202) 586-5969 or Sharon Skuchko of my office at (202) 586-4590.

Sincerely,



John P. Roberts
Acting Associate Director for
Systems and Compliance
Office of Civilian Radioactive
Waste Management

Enclosure:
ICNs 4.2A and 3.2A

cc w/Enclosure:
C. Gertz, YMPO
T. J. Hickey, Nevada Legislative Committee
R. Loux, State of Nevada
M. Baughman, Lincoln County, NV
J. Bingham, Clark County, NV
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