



Department of Energy

Washington, DC 20585

JAN 7 1993

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:

In October of 1992, the U.S. Nuclear Regulatory Commission (NRC) transmitted (by letter from Holonich to Roberts) comments on Revision 2 of the "Civilian Radioactive Waste Management System Management and Operating Contractor Quality Assurance Program Description" (M&O QAPD), to the U.S. Department of Energy, Office of Civilian Radioactive Waste Management (OCRWM). The transmittal identified two comments that needed to be addressed in order to resolve NRC concerns.

The purpose of this letter is to respond to the comments mentioned above, and to transmit a copy of Revision 3 of the M&O QAPD (Enclosure 1) for information. OCRWM responses to the comments are delineated below.

Comment 1:

Although it is stated in DOE's August 27, 1992 response package that the M&O is committed to the OCRWM Quality Assurance Requirements Document (QARD), there does not appear to be a similar definitive statement in the M&O QAPD QA Policy Statement or Introduction.

Response:

The introduction to the QAPD has been revised to provide a clear statement that the QAPD is based on the OCRWM QARD; however, a more definitive statement is found in Section 2, "Quality Assurance Program." Section 2.1.1 states:

"The hierarchy of QA documents that govern and control the quality affecting activities of the M&O and its subcontractors are:

- a. DOE OCRWM Quality Assurance Requirements Document (QARD)
- b. M&O Quality Assurance Program Description (QAPD), ..."

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This section identifies the QARD as a commitment and establishes the QARD as the top level QA document for the M&O.

Comment 2

Comment 2 consisted of a list of 5 specific items which were to be incorporated into Revision 3 of the M&O QAPD. Each of the 5 items are addressed separately below:

Item 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.

Response: Section 1.3 has been revised to address the need to identify organizational interfaces in plans and procedures. Figure 1.3 has also been added, this figure identifies the top level organizational interfaces between OCRWM and the M&O.

Item 2: Section 1 - Revision 3 of the QAPD will require that the QAPD be approved by both the General Manager, GM, and QA Manager.

Response: Section 1.1.2b has been revised to identify that one of the responsibilities of the QA Manager is approving the QAPD. Section 1.1.1c identifies that one of the responsibilities of the GM is approval of the QAPD. Section 2.1.2 states that both the QA Manager and GM approve the QAPD.

Item 3: Section 3 - Revision 3 of the QAPD will contain a requirement to "analyze design changes to assure that change is required."

Response: QAPD section 3.4.5 now states that Design changes are evaluated for need.

Item 4: Section 6 - "In a timely manner" will be added to Revision 3 of Section 6.1.2e of the QAPD.

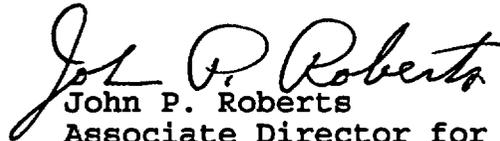
Response: Section 6.1.2e has been revised to addresses timeliness.

Item 5: Section 18 - The discussion regarding the tracking system for audit findings will be expanded to address "prioritization" in Revision 3 of the QAPD.

Response: Section 18.6 of the QAPD has been expanded to address the prioritization of audit findings.

If you have any questions, please contact Sharon Skuchko of my office at (202) 586-4590.

Sincerely,



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

Enclosure: As Stated



cc: w/ enclosure

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