

JAN 18 1993

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

Dear Mr. Roberts:

SUBJECT: OBSERVATION AUDIT OF U.S. DEPARTMENT OF ENERGY OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT

I am transmitting the U.S. Nuclear Regulatory Commission Observation Audit Report No. 93-02 of the U.S. Department of Energy (DOE), Office of Civilian Radioactive Waste Management (OCRWM) limited scope internal QA audit of OCRWM from November 30 through December 10, 1992. The Yucca Mountain Quality Assurance Division (YMQAD) activities in Las Vegas were audited November 30-December 4, 1992, and the OCRWM Headquarters (HQ) activities were audited December 7-10, 1992, at the Forrestal Building in Washington, D.C. This OCRWM audit, HQ-93-01, evaluated the OCRWM QA program to determine whether it meets the OCRWM requirements and commitments. The audit scope included seven QA programmatic elements. No technical areas were evaluated by the audit team.

The NRC staff evaluated the OCRWM audit to gain confidence that OCRWM is properly implementing the requirements of its QA program both at Las Vegas, NV and at Washington, D.C. The NRC staff based its evaluation of the OCRWM audit process and the OCRWM QA program on direct observations of the auditors; discussions with audit team personnel, with other contractor personnel, and with OCRWM personnel; and reviews of the audit plan, the audit checklists, and other pertinent OCRWM documents.

The NRC staff has determined that OCRWM Audit No. HQ-93-01 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 its assignments and checklist items were adequately described in the audit plan.

The NRC staff agrees with the preliminary OCRWM audit team finding that the OCRWM QA program has adequate procedural controls in place. The NRC staff also agrees that QA program implementation in the areas audited is generally adequate even though Corrective Action was judged by the audit team to be marginally effective at YMQAD. A total of eight preliminary Corrective Action Requests (CARs) were discussed by the OCRWM audit team at the post-audit meeting. Also, several other potential CARs were acceptably resolved by the audited OCRWM organization during the audit. None of the CARs identified by the OCRWM audit team is significant in terms of the overall OCRWM QA program.

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Mr. John P. Roberts

2

The staff had concerns regarding the independence of the audit team during the HQ portion of the audit. During the audit, the Audit Team Leader (ATL) took action to provide more audit team independence by having auditors from YMQAD assume some of the audit team and ATL's responsibilities regarding the audit of work performed by the ATL's employing organization. While the staff believes that acceptable independence was provided in this way, we recommend that the planning for future internal audits of OCRWM provide for more audit team independence.

On Tuesday, December 8, the Director of the HQ QA Division joined the daily audit team debriefing meeting while it was in session. Although this individual had a primary responsibility for the audit, he and his organization were also being audited. These meetings are generally limited to the audit team and observers, and they provide a forum for an open discussion of findings. The presence of this individual appeared to stifle some of the ongoing discussion, and the NRC staff recommends that attendance at these meetings be limited to the audit team and observers.

OCRWM management should closely monitor the OCRWM QA program to ensure that the deficiencies identified during this audit and earlier audits and surveillances are corrected in a timely manner and future implementation is effective. The NRC staff expects to participate in this monitoring as observers and may perform its own independent audits later to assess the OCRWM QA program.

A written response to this letter or the enclosed report is not required. If you have any questions, please call Jack Spraul of my staff on (301) 504-2446.

Sincerely,

/s/

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
C. Gertz, DOE/NV	Committee, NV
C. Shank, Churchill County, NV	M. Murphy, Nye County, NV
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Mr. John P. Roberts

3

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