



Department of Energy
Washington, DC 20585

JAN 29 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:

This responds to the U.S. Nuclear Regulatory Commission (NRC) Observation Audit Report No. 93-01, transmitted via NRC letter dated December 7, 1992 (Holonich to Roberts), in which the NRC identified a weakness in Section 5.10(b)(1) of that report and requested in its letter that a written response by the U.S. Department of Energy (DOE) be provided to the NRC within 60 days of the date of that letter.

As described in the NRC Observation Audit Report, during the Office of Civilian Radioactive Waste Management (OCRWM) audit of the U.S. Geological Survey in October 1992 (Audit No. YMP-93-01), NRC representatives identified a weakness in the OCRWM audit program. The NRC Observation Audit Report describes that weakness as follows: "Audit technical evaluations and criteria for conducting those evaluations are not prescribed by documented instructions or procedures and may not totally meet the intent of 10 CFR Part 50, Appendix B, Criterion 5. Technical evaluation criteria had previously been identified in audit plans."

In response to the NRC Observation Audit Report, the DOE offers the following:

OCRWM procedures, Quality Assurance Administrative Procedure (QAAP) 18.1, Revision 3, "Qualification of Audit Personnel," and QAAP 18.2, Revision 5, Interim Change Notice 1, "Audit Program," describe the method used by OCRWM to qualify/certify auditors and conduct audits. These establish three classifications for auditors: (1) Certified Lead Auditors; (2) Auditors; and (3) Technical Specialists. Audit teams are composed of an Audit Team Leader (ATL), who is always a certified Lead Auditor, and auditors. The auditors may be certified Lead Auditors, Auditors, or Technical Specialists, depending on the scope and complexity of the planned audit. These procedures meet the requirements of 10 CFR Part 50, Appendix B, including Criterion 5.

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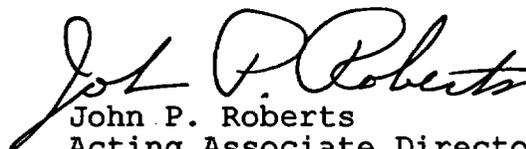
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During the audit, the entire Audit Team is directed by the ATL. During a specific audit, there are a variety of assignments that may be given to a Technical Specialist by the ATL--some oral and some in writing. The Audit Plan is required to identify the audit scope, requirements, audit personnel, activities to be audited, organizations to be notified, applicable documents, schedule, and written procedures or checklists. There are no requirements for the Audit Plan to identify technical evaluation criteria. Early on in the audit process, OCRWM did include technical evaluation criteria in audit plans to provide the audited organization with information regarding what to expect; however, since OCRWM is now in its third year of auditing participants, it is no longer including this criteria.

As a result of NRC Observation Audit Report No. 93-01, OCRWM has decided to enhance the procedures to clear up any misunderstanding concerning the role of Technical Specialists and, in the interim, will again refer to appropriate technical evaluation criteria within audit plans. All procedures are currently being evaluated for impact with respect to the newly issued Quality Assurance Requirements and Description document. Pending the results of that evaluation, a schedule for revising the procedures will be established.

Should you have any questions in this regard, please contact 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

cc:

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