

FEB 17 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, D.C. 20585

Dear Mr. Roberts:

SUBJECT: OBSERVATION AUDIT OF THE U.S. DEPARTMENT OF ENERGY OFFICE OF
ENVIRONMENTAL RESTORATION AND WASTE MANAGEMENT VITRIFICATION
PROJECTS DIVISION

I am transmitting the U.S. Nuclear Regulatory Commission Observation Audit Report No. 93-04 for the U.S. Department of Energy (DOE), Office of Civilian Radioactive Waste Management (OCRWM), performance-based Quality Assurance (QA) Audit No. HQ-93-02 of the DOE Office of Environmental Restoration and Waste Management Vitrification Projects Division (EM-343) conducted in Germantown, Maryland, January 11-15, 1993. The audit scope included the evaluation of the processes and products of the EM-343 Technical Review Group, Operational Readiness Reviews, verification methodology (audits/surveillances), program execution documents, and eleven of the QA program elements to determine whether the EM-343 QA program meets the requirements and commitments imposed by the OCRWM.

The NRC staff evaluated the OCRWM QA audit to gain confidence that OCRWM and EM-343 are properly implementing the requirements of its QA programs. The NRC staff based its evaluation of the OCRWM audit process and the EM-343 QA program on direct observations of the auditors; discussions with the audit team, EM-343 personnel, and EM-343 contractor personnel; and reviews of the pertinent audit information (e.g., audit plan, audit checklists, and EM-343 documents).

The NRC staff has determined that OCRWM Audit No. HQ-93-02 was useful and effective. The audit was well organized and conducted in a thorough and professional manner. 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 agreed with the OCRWM audit team's preliminary findings that the EM-343 QA program has adequate procedural controls in place and that implementation of the EM-343 QA program was adequate in nine of the fifteen areas audited with the remaining determined to be marginally effective. Four Corrective Action Requests (CARs) were issued by the OCRWM audit team; one in the area of technical reviews, one in the area of operational readiness reviews, one in the area of auditing, and one in the area of QA program

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controls. The deficiencies identified in the CARs are not significant in terms of the overall EM-343 QA program and should not affect the quality of any EM-343 vitrification activities if corrected in a timely manner.

OCRWM should closely monitor EM-343 QA program implementation to ensure that the deficiencies identified during this audit and earlier audits and surveillance are corrected in a timely manner and that future implementation is effective. The NRC staff expects to participate in this monitoring as observers and may perform its own independent audits at a later date to assess the EM-343 QA program.

A written response to the weakness concerning the list of items and activities to which the EM-343 QA program applies identified in Section 5.9.2 of the enclosed report should be provided within 60 days of the receipt of this letter. If you are unable to provide the response within that time, please provide the date by which DOE will respond. If you have any questions, please call William Belke on (301) 504-2445.

Sincerely,

JS/

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
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