

APR 6 1993

Mr. Dwight E. Shelor, 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. Shelor:

SUBJECT: OBSERVATION AUDIT OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM, MANAGEMENT AND OPERATING CONTRACTOR, LAS VEGAS, NEVADA

I am transmitting the U.S. Nuclear Regulatory Commission Observation Audit Report No. 93-07 for the U.S. Department of Energy (DOE), Office of Civilian Radioactive Waste Management (OCRWM), Yucca Mountain Quality Assurance Division (YMQAD) Quality Assurance (QA) Audit No. YMP-93-07 of the Civilian Radioactive Waste Management System, Management and Operating Contractor (M&O) conducted in Las Vegas, Nevada, and at the Nevada Test Site, March 1-8, 1993. This was the first audit of the M&O Las Vegas, Nevada, QA program performed by YMQAD. The audit evaluated seven QA programmatic elements to determine whether the M&O QA program meets the requirements and commitments imposed by the OCRWM. No technical areas were evaluated by the audit team.

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

The NRC staff has determined that Audit No. YMP-93-07 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 agrees with the YMQAD audit team's preliminary findings that the M&O QA program generally has adequate procedural controls in place and that overall implementation of the M&O QA program is marginally effective. The M&O QA program was adequate in four of the seven areas audited; two areas were unsatisfactory; and the remaining area was marginally effective.

Three preliminary Corrective Action Requests (CARs) were issued by the YMQAD audit team; one in the area of procedure preparation, one in the area of inadequate procedures, and one in the area of nonconformance control. Two other conditions adverse to quality, pertaining to personnel qualifications

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and inadequate procedures, were noted. Due to their similarity in nature to findings previously identified during the M&O Vienna, Virginia, audit conducted February 1-5, 1993, these deficiencies were added to the CARs developed during that audit. Another deficiency pertaining to the generation, processing, and distribution of Field Change Requests to drawings and specifications was noted during this audit. However, since it was within the Yucca Mountain Site Characterization Project Office's (YMPO) area of responsibility, the CAR was issued to YMPO.

The deficiencies identified in the CARs are not significant in terms of the overall M&O QA program and should not affect the quality of any M&O quality affecting activities if corrected in a timely manner.

DOE should closely monitor the M&O QA program implementation to ensure that the deficiencies identified during this audit 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 M&O QA program.

Written responses to the Weaknesses noted in Section 5.9.2 of the enclosed report are requested. 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
- T. J. Hickey, Nevada Legislative Committee
- C. Gertz, DOE/NV
- M. Murphy, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
- D. Weigel, GAO
- P. Niedzielski-Eichner, Nye County, NV
- B. Mettam, Inyo County, CA
- V. Poe, Mineral County, NV
- F. Sperry, White Pine County, NV
- R. Williams, Lander County, NV
- L. Fiorenzi, Eureka County, NV
- L. Vaughan II, Esmeralda County, NV
- C. Shank, Churchill County, NV
- E. Holstein, Nye County, NV.

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NAME	WBelke	<i>JS</i>	J Buckley	<i>JS</i> KHooks	JHolonich
DATE	3/31/93		3/31/93	3/31/93	4/6/93

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