U. S. NUCLEAR REGULATORY COMMISSION OBSERVATION SURVEILLANCE REPORT NO. 93-S2 FOR THE OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT SURVEILLANCE NO. YMP-SR-93-16 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM, MANAGEMENT AND OPERATING CONTRACTOR

4/24/93 John W. Gilray

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# **OBSERVATION SURVEILLANCE REPORT NO. 93-52**

### **1.0 INTRODUCTION**

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From March 22-25, 1993, the U.S. Department of Energy (DOE), Office of Civilian Radioactive Waste Management (OCRWM), Yucca Mountain Quality Assurance Division (YMQAD) conducted Quality Assurance (QA) Surveillance No. YMP-SR-93-16 of the Civilian Radioactive Waste Management System, Management and Operating contractor (M&O) QA program in Las Vegas, Nevada.

### 2.0 PURPOSE

The U.S Nuclear Regulatory Commission staff observed and evaluated the YMQAD QA surveillance to gain confidence that YMQAD and the M&O are properly implementing the requirements of their QA programs by assessing the effectiveness of the YMQAD surveillance and determining the adequacy of the M&O QA program in the areas observed. The staff's evaluation is based on direct observations of the surveillance process, discussions with the YMQAD surveillance team and M&O personnel, and reviews of pertinent M&O records.

### 3.0 SCOPE

The scope of this surveillance was limited to evaluating: 1) M&O procedures for receiving and processing changes to Raytheon Services Nevada (RSN) design documents; 2) M&O acceptance, review, and verification of design documents, engineering analyses and calculations from RSN; 3) M&O use and control of Field Change Requests; 4) M&O procedures for the identification of design documents, and 5) M&O implementation of M&O design procedures.

## **4.0 SURVEILLANCE PARTICIPANTS**

4.1 NRC

John Gilray **Observer** 4.2 YMQAD Frank Kratzinger Surveillance Team Leader Science Applications International Corp. (SAIC) SAIC Jerry Heaney Auditor Wavne Booth Auditor Roy F. Weston Inc. Fred Lofftus Auditor SAIC Don Horton

**OCRWM Headquarters** 

**Observer** 

4.3 State of Nevada

Suzan Zimmerman Observer

#### **5.0 SURVEILLANCE SUMMARY RESULTS**

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As a result of this surveillance, five deficiencies pertaining to the lack of QA program design control procedures were identified and documented on a single preliminary Corrective Action Request. The surveillance team determined that the M&O design organization was working to design guideline procedures but these were not referenced nor incorporated in the M&O QA program. The M&O has been instructed to make these guideline procedures part of the M&O QA program. The surveillance team did not believe that the design products (drawings, specifications, and analysis) were adversely affected by this deficiency. The YMQAD surveillance team did not make any findings concerning the general adequacy of the M&O QA program.

The five deficiencies identified by the surveillance team are as follows:

- Procedures used for design verification do not provide criteria for determining the method of verification as required by the M&O QA Program Description, Revision 3, Paragraph 3.4.2.e.
- Lack of an Implementing Line Procedure (ILP) to describe the development, review, and approval of the Basis for Design Document.
  - No ILP for revising the RSN "Basis for Design Document."
  - No ILP to describe the procedural process for design verification of changes.
  - No ILP describing the process of identifying and maintaining "To Be Identified" information on design drawings.
- M&O procedures do not address the selection and review of design methods as required by NQA-1, Supplement 3S-1.
- M&O procedures do not address the control of design information transmitted across internal design interfaces as required by NQA-1, Supplement 3S-1.
- Procedures do not require documentation of reviews (intra/inter discipline) for drawings, calculations, design specifications, and technical documents as required by NQA-1, Supplement 3S-1.

#### 6.0 NRC CONCLUSIONS

The NRC staff has determined that the DOE/OCRWM surveillance of the M&O QA program was useful and effective. The surveillance team was very familiar with the M&O QA procedures in the areas being surveilled. The NRC staff agrees with the OCRWM surveillance team's preliminary findings as stated in Section 5.0 above.