

AUG 13 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 U.S. DEPARTMENT OF ENERGY VITRIFICATION
PROJECTS DIVISION

This letter transmits the U.S. Nuclear Regulatory Commission comments resulting from its observation of the August 2-6, 1993, U. S. Department of Energy (DOE), Office of Environmental Restoration and Waste Management, Waste Management Projects, Vitrification Projects Division (EM-343) internal quality assurance (QA) audit (Audit 93EA-VP-AU-001) in Germantown, Maryland. The audit was performed by a team of consultants. A representative of the DOE Office of Civilian Radioactive Waste Management also observed this audit. EM-343 is responsible for the administration and overview of site field offices to ensure the acceptability of high-level radioactive canistered waste forms.

The objective of this internal EM-343 QA audit was to assess the overall adequacy, implementation, and effectiveness of the EM-343 QA program for the waste acceptance activities related to high-level waste form production. In addition, the audit served to follow-up on corrective action requests identified during previous internal and external audits. Our objectives were (a) to determine whether the audit was performed in such a manner as to provide confidence in the EM-343 audit process and (b) to determine whether EM-343 was properly implementing the requirements specified in Revision 1 of its Quality Assurance Program Description and the EM-343 implementing procedures.

Two Deviation Corrective Action Reports (DCARs) work are scheduled to be issued by the audit team. They concern the need to establish a root cause analysis methodology and the need to upgrade the training/training records of personnel performing EM-343 work. Several other deviations in the area of nonconformance control were also identified by the audit team and corrected during the audit. At the exit meeting with EM-343 personnel, the audit team also reported a number of observations/recommendations which it felt would improve the EM-343 QA program and its implementation. These observations/recommendations and deviations are not significant in terms of the overall QA program, and they do not affect the quality of the EM-343 activities. Except as noted, EM-343 was found to be properly implementing its QA program for the areas audited.

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The NRC staff found the audit to be satisfactory both from the perspective of the audit team, EM-343, and EM-343 contractors. The audit team was well qualified in the QA discipline, and its checklists were acceptable. The audit was well organized and conducted in a thorough and professional manner. However, there were significant logistic delays caused by the fact that the audit team work area was about one mile from the location of the EM-343 personnel undergoing the audit.

The audit team made use of prior audit findings. This resulted in comprehensive audit preparation, conduct, and conclusion. The audit team did not include any technical specialists, and no evaluation was made of the technical adequacy of work products. EM-343 management indicated that technical adequacy will be within the scope of future internal audits and surveillances.

At the pre-audit conference, the audit team noted that QA Criteria 8 through 14 do not apply to EM-343 activities. At the post-audit conference, the audit team concluded that QA Criteria 1, 2 (except training/training records), 3, 5, 6, 17, and 18 were effectively implemented; QA Criteria 4, 7, and 15's effectiveness were indeterminate due to the lack of activity in these areas since the last audit; and QA Criteria 2 (training/training records only) and 16 were marginally effective because of the DCARs in these areas. The NRC staff agrees with these conclusions.

Should you have any questions, please contact 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

cc:

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Legislative Committee, NV

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DATE	08/12/93		08/12/93		08/12/93				

Mr. Dwight E. Shelor

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