



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
 WASHINGTON, D.C. 20555-0001

**AUG 26 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**

This letter transmits the Nuclear Regulatory Commission (NRC) staff comments resulting from its observation of the internal quality assurance (QA) audit (93-NSA-02) of the U.S. Department of Energy (DOE) Civilian Radioactive Waste Management System, Management & Operating Contractor (M&O) in Las Vegas, Nevada during June 28-July 2, 1993.

The purpose of the audit was to evaluate the adequacy and effectiveness of the M&O Las Vegas QA program through performance based reviews of Determination of Importance Evaluations (DIEs), Waste Isolation Evaluations, Implementing Line Procedures, calculations/drawings and computer software. In addition, the following QA programmatic elements were audited: Organization, QA Program, Design Control, Plans, Procedures and Drawings, Document Control, Corrective Action and QA Records. The audit team consisted of an audit team leader, two technical auditors, two QA auditors and one auditor in training.

The NRC observer concentrated his review on the auditing of the DIEs, the Waste Isolation Evaluations, the calculations/drawings, and the Implementing Line Procedures.

The auditors concluded that, with the exception of minor deficiencies, the M&O QA program was being adequately implemented in those areas audited. The two deficiencies pertained to the lack of referencing the DIE plan in the QA procedure for preparing DIEs, and the lack of control of technical inputs for use in the Waste Isolation Evaluations.

Based on the observations of this audit, it is concluded that the M&O internal audit process was marginally effective. Problems were experienced throughout the audit by the auditors of the design process in scheduling and coordinating audit interviews with the technical staff of the M&O Las Vegas organization. Further, auditors appeared to lack a clear understanding and knowledge of deficiencies (open and closed) previously reported by either DOE or the M&O. During the audit exit meeting, M&O management and the audit team leader acknowledged these problems and agreed to take corrective measures to assure that in the future the audit process is more effective.

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The results of this audit, in conjunction with previous Yucca Mountain, Quality Assurance Division QA surveillances, clearly points out the need for improved QA procedural controls and implementation by the M&O contractor.

Should you have any questions regarding this letter, please contact Ken Hooks on (301) 504-2447.

Sincerely,

Original Signed by

*for* *JS* *Joseph J. Holonich*

Joseph J. Holonich, Director  
Repository Licensing and Quality Assurance  
Project Directorate  
Division of High-Level Waste Management  
Office of Nuclear Material Safety  
and Safeguards

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