



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 20, 1993

NOTE TO: Ken Hooks

FROM: Jack Spraul

SUBJECT: REVIEW OF DOE AUDITS AND SURVEILLANCES WITH NO NRC OBSERVERS

Per your request, I reviewed the reports of the fiscal year 1993 DOE high-level radioactive waste (HLW) audits and surveillances that were not observed by HLWM staff members. There were 9 such audits and 42 such surveillances.

The results of this review are consistent with the results of the staff's observation audits/surveillances when the staff actually observes a DOE audit or surveillance. That is, based on the information in the reports, I agree with the audit teams' findings that implementation of a specific criterion of a QA program was adequate (or satisfactory), marginally adequate, unsatisfactory, or indeterminate dependent on the findings in the audited areas. In no case did the DOE find an organization's QA program to be ineffective. Based on my review of the reports, I agree.

I also agree that the Corrective Action Requests (CARs) deemed by the audit/surveillance teams to be not significant, including those that were resolved during the audits/surveillances, are not significant in terms of the overall high-level waste QA Program. CARs deemed by the audit team to be significant do appear to be more serious than the others, and their classification as "significant" requires a determination of the root cause of the problem and corrective action to prevent recurrence. In no case does there appear to be a reason to seriously question the QA program applied to the work or the resultant quality of the work that had been audited/surveilled.

A detailed summary of the results of reviewing the reports of these audits and surveillances is enclosed. Enclosure 1 covers audits and Enclosure 2 covers surveillances. Each enclosure lists the report number, the organization audited or surveilled, the date of the audit or surveillance, and the resulting corrective action requests (CARs).

Potential CARs cover nonconformances that (1) are deemed to be isolated in nature, (2) are judged to require remedial action only, and (3) can be closed during the audit/surveillance. They are almost always closed with the corrective (remedial) action verified during the audit/surveillance. The audit and surveillance reports I reviewed describe 28 potential CARs - 27 from the audit reports and 1 from a surveillance report - that were closed and verified in this fashion. These potential CARs are not listed in the enclosures since they require no tracking or other follow-up.

These same audit and surveillance reports also list 97 recommendations - 21 from the audit reports and 76 from the surveillance reports - that are not

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listed in the enclosure for the same reason. During my review of the reports, I checked to see if there were any recommendations made by the audit/surveillance team that I would consider to be potential CARs. I found none.

Let me know if you need or want anything else in this regard.

Jack

Enclosures: As noted.

Distribution:
HLPD R/F
QA SECTION

RESULTS OF REVIEW OF FY-93 REPORTS OF DOE AUDITS
WITH NO NRC OBSERVERS

<u>REPORT NUMBER</u>	<u>AUDITEE</u>	<u>DATE</u>	<u>CORRECTIVE ACTION REQUESTS</u>
YMP-93-03	SNL	11/30/92 - 12/04/92	YM-93-021: Holders of controlled documents failed to keep their assigned controlled documents current. YM-93-022: Annual management assessment not initiated within the required time. YM-93-023: Failure to evaluate sub-tier suppliers.
HQ-93-04	PNL	04/13-15/93	HQ-93-022: Deficiencies in procedure content, availability, and implementation. HQ-93-023: Failure to submit QA records to the Records Holding Area in a timely manner.
YMP-93-04	LLNL	01/11-15/93	None.
HQ-93-06	GA	07/19-22/93	HQ-93-029: QA Topical Report not maintained to reflect current practices, organization, and responsibilities.
YMP-93-06	REECO	02/08-12/93	YM-93-033: Calibrations not per procedures and procedures needing revision not revised.
YMP-93-10	USGS	06/14-18/93	YM-93-052: Insufficient management controls to ensure timely CAR closure. YM-93-053: Purchase orders for calibration services do not include applicable quality assurance program requirements.
YMP-93-11	LANL	05/24-28/93	YM-93-049: Identification and control of interfaces not properly documented. YM-93-050: A page of an attachment to a quality record lacked information linking it unambiguously to the attachment. YM-93-051: All required personnel not trained to a procedure.

**RESULTS OF REVIEW OF FY-93 REPORTS OF DOE AUDITS
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<u>REPORT NUMBER</u>	<u>AUDITEE</u>	<u>DATE</u>	<u>CORRECTIVE ACTION REQUESTS</u>
YMP-93-15	YMPO	08/09-13/93	YM-93-086: Work implemented prior to review of procurement documents, and failure to use an applicable procedure when processing an Interagency Agreement with the U.S. Bureau of Reclamation.
YMP-93-18	SAIC	09/27/93 - 10/01/93	None.

RESULTS OF REVIEW OF FY-93 REPORTS OF DOE SURVEILLANCES
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<u>REPORT NUMBER</u>	<u>ORG.</u>	<u>DATE</u>	<u>CORRECTIVE ACTION REQUESTS</u>
YMP-SR-93-001	EG&G	10/15-16/93	YM-93-005: Procedures do not contain all the requirements imposed by the Quality Program Description. YM-93-006: Procedures do not require same organizations review and approve changes to procurement documents. YM-93-007: Required forms were not used to request and document comments during review of a series of technical procedures. YM-93-008: Document control activities required to be performed by the quality assurance organization were being performed by a different organization. YM-93-009: A condition adverse to quality was reported as a concern rather than as a condition adverse to quality. YM-93-010: There was no assessment plan for a particular assessment.
YMP-SR-93-002	USGS	11/17/93 -	YM-93-025: Calibration status stickers not affixed to some measuring equipment. YM-93-026: Tracer concentration on the vacuum side of a borehole was not monitored during initial drilling activities. YM-93-027: No procedures had been developed to implement the Tracers, Fluids, and Materials Plan.
HQ-SR-93-03	M&O	08/04-06/93	None.
YMP-SR-93-003	RSN & YMPO	11/17/93 - 12/10/93	None.
HQ-SR-93-05	M&O	08/24-24/93	None. (Transportation)

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<u>REPORT NUMBER</u>	<u>ORG.</u>	<u>DATE</u>	<u>CORRECTIVE ACTION REQUESTS</u>
YMP-SR-93-005	USBR	11/19-20/92	None.
YMP-SR-93-006	RSN	11/16-20/93	None.
YMP-SR-93-007	YMPO	12/3-7/93	None.
YMP-SR-93-008	USGS	12/03/92	None.
YMP-SR-93-009	YMPO	12/17/93	None.
YMP-SR-93-012	RSN	01/12-13/93	YMP-93-028: Failure to revise Field Verification Plan upon issue of document that would revise inspection criteria. YMP-93-029: Failure to list inspected characteristics as required on reports. YMP-93-030: Lack of procedure for documenting item configuration when not in accordance with the design but allowed by drawing.
YMP-SR-93-013	M&O	01/12-22/93	93-QC-C-005: A "Basis for Design" document was not submitted to the local records center as required. 93-QC-C-006: Procedures do not address the required review and approval of RSN design specifications and drawings. Specifications were distributed without documented review and approval. 93-QC-C-007: A "Basis for Design" document was neither accepted nor placed under configuration control as required. Drawings and specifications were not being evaluated for impact to the "Basis for Design" document.
YMP-SR-93-014	USBR	02/23/93	None.
YMP-SR-93-015	YMPO	01/20/93 - 02/03/93	None.

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<u>REPORT NUMBER</u>	<u>ORG.</u>	<u>DATE</u>	<u>CORRECTIVE ACTION REQUESTS</u>
YMP-SR-93-017	M&O	02/22-26/93	YM-93-038: Lack of verification of inputs for correct selection, verification, and approval. Lack of documentation of the verification method used.
YMP-SR-93-018	M&O & YMPO	02/16-18/93	None.
YMP-SR-93-019	RSN	03/02/93	None.
YMP-SR-93-020	M&O & YMPO	03/29/93 - 04/02/93	None.
YMP-SR-93-021	REECO	04/29/93 & 05/05/93	None.
YMP-SR-93-022	M&O	04/22/93	None.
YMP-SR-93-023	RSN & REECO	03/24/93 - 04/02/93	None.
YMP-SR-93-024	USGS	05/10-21/93	None.
YMP-SR-93-025	REECO	06/02-14/93	None.
YMP-SR-93-026	USGS	06/29/93	YM-93-054: Calibration data for Ph meters and specific conductance meters not entered into notebook or other organized documentation.
YMP-SR-93-027	SAIC	06/07-10/93	None.
YMP-SR-93-028	REECO	07/08/93 & 07/21/93	None.
YMP-SR-93-029	REECO	07/20-21/93	None.
YMP-SR-93-030	RSN & SAIC	06/26/93 & 07/06/93	YM-93-071: Field print data not in the order specified in the applicable procedure.
YMP-SR-93-031	M&O	08/02-09/93	YM-93-066: Procedure requirements differ from DOE requirements

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			YM-93-067: Extent of testing thiosulfate ion concentration on processed microfilm less than specified.
			YM-93-068: Lack of controls for measuring and test equipment.
			YM-93-069: No evidence of qualification of supplier of analytical chemistry service
YMP-SR-93-032	PNL	07/07-08/93	None.
YMP-SR-93-035	YMPO	07/26/93 - 08/18/93	YM-93-087: Some field prints listed two different borehole numbers and thus did not provide traceability of the data from the borehole and specific logging job. Also, one required item, "before-survey casing check," was missing on the field print for a log.
YMP-SR-93-036	RSN	08/17/93	None.
YMP-SR-93-037	YMPO	08/16/93 - 09/08/93	YM-93-093: Documented "flowdown" of requirements for the scientific investigation process is inconsistent and incomplete. The sequence or series of prerequisites for a scientific investigation process is not controlled nor is there an implementing procedure for this process. Some Test Planning Packages do not clearly document the content or revision history. Some Job Packages do not reference their initiating Test Planning Package.
YMP-SR-93-038	M&O	08/11-93	None.
YMP-SR-93-040	USGS	08/06/93 & 09/02/93	None.
YMP-SR-93-041	REECO	09/14/93 - 10/18/93	None.

YMP-SR-92-028	LLNL	9/29-10/9/92	1. (YM-93-017) Internal Grading Report LLNL-QAG-L042 identified activity I-20-22 as non-quality affecting; however, based on the activity identified in SIP-PA2 the activity is considered quality affecting.
YMP-SR-92-029	YMPO	8/18-9/2/92	No CARs issued.
YMP-SR-92-030	RSN	9/15-28/92	No CARs issued.
YMP-SR-93-001	EG&G	10/15-16/92	1. (YM-93-005) Implementing procedures do not contain all the requirements imposed by the QPD. 2. (YM-93-006) Implementing procedure does not allow for the same organization to review and approve changes to procurement documents. 3. (YM-93-007) No DRR or DRS forms were utilized to request and document comments during the review of Y300-051 series Technical Procedures. 4. (YM-93-008) QAO did not perform document control functions for the Y300 series procedures. 5. (YM-93-009) Concern CO-92-010, issued as a Concern, should have been issued as a Condition Adverse to Quality. 6. (YM-93-010) There was no assessment plan for the assessment Q92-U2-09 of the Yucca Mountain Site Characterization Project conducted 10/7-8/92.

ENCLOSURE 2

FISCAL YEAR 1992 AUDITS