



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

RECEIVED 12 1994

Mr. Dwight E. Shelor, Associate Director
for Systems and Compliance
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Dear Mr. Shelor:

**SUBJECT: NUCLEAR REGULATORY COMMISSION OBSERVATION OF THE U.S.
DEPARTMENT OF ENERGY'S CIVILIAN RADIOACTIVE WASTE
MANAGEMENT SYSTEM MANAGEMENT AND OPERATING
CONTRACTOR'S INTERNAL AUDIT OF ITS DESIGN ACTIVITIES**

This letter transmits the results of the Nuclear Regulatory Commission staff's comments resulting from its observation of the February 21-25, 1994, U.S. Department of Energy's (DOE) Civilian Radioactive Waste Management System Management and Operating Contractor's (M&O) internal quality assurance (QA) audit (Audit No. 94-NSA-01) at Las Vegas, Nevada. This audit was conducted by five QA auditors and one technical auditor experienced in design and design controls. Qualifications and experience of these six auditors were reviewed by the NRC observer and were found to be acceptable, meeting DOE and NRC requirements.

The M&O's objective for this internal QA audit was to assess its design process for the Exploratory Studies Facility (ESF) which included the assessment of its organization, design controls, implementing procedures and corrective actions. NRC's objectives were (a) to determine whether the audit was performed in such a manner as to provide confidence in the M&O audit process and (b) to determine whether the M&O was properly implementing the requirements specified in its QA program.

The NRC observer of this audit concentrated on those areas pertaining to the preparation, review, approval, controlled distribution and use of the Determination of Importance Evaluations, design calculations, analysis, drawings, and specifications associated with the ESF. The M&O audit team identified eight Corrective Action Reports (CARs) which were not considered to be significant nor have an impact on the quality of the design packages. Overall, the M&O audit team considered the areas audited to be effective and in compliance with the exception of the eight CARs.

The NRC observer concluded that this M&O audit was in-depth, effective and demonstrated an improvement over past M&O audits. In addition, the NRC observer noted improvements in the M&O design process including the design organization understanding and use of QA and design procedural requirements.

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Mr. Dwight E. Shelor

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Should you have any questions, please contact Bill Belke of my staff on (301) 415-5874.

Sincerely,

Joseph J. Holonich, Chief
High-Level Waste and Uranium
Recovery Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

cc: See attached list

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