U. S. NUCLEAR REGULATORY COMMISSION SURVEILLANCE OBSERVATION REPORT NO. 94-S2 OF THE OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT SURVEILLANCE NO. HQ-SR-94-03

OF THE VITRIFICATION PROJECTS DIVISION (EM-343)

03/31/94

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## **1.0 INTRODUCTION**

During March 14 through 16, 1994, quality assurance (QA) staff of the Nuclear Regulatory Commission Division of High-Level Waste Management observed the U.S. Department of Energy (DOE), Office of Civilian Radioactive Waste Management (OCRWM) QA Surveillance No. HQ-SR-94-03 of the DOE Office of Environmental Restoration and Waste Management Vitrification Projects Division (EM-343). The surveillance team conducted interviews with EM-343 and its contractor personnel and reviewed pertinent documents in Germantown, Maryland. A member of the NRC staff participated as an observer on this surveillance.

# 2.0 SCOPE

The surveillance, HQ-SR-94-03, focused on EM-343 implementation and effectiveness of remedial actions taken in response to deficiencies identified and recommendations made during earlier OCRWM audits, surveillances, and observations.

### 3.0 PURPOSE

The NRC staff observed and evaluated the OCRWM QA surveillance to gain confidence that OCRWM and EM-343 are properly implementing the requirements of their QA programs by assessing the effectiveness of the OCRWM surveillance and determining the adequacy of the EM-343 QA program in the areas under surveillance. The NRC staff's evaluation is based on direct observations of the surveillance process; discussions with the OCRWM surveillance team, EM-343 personnel, and EM-343 contractor personnel; and reviews of pertinent EM-343 records.

# 4.0 SURVEILLANCE PARTICIPANTS

4.1 NRC

Jack Spraul Observer

### 4.2 DOE/OCRWM

| Tom Swift       | Surveillance Team Leader | OCRWM/Quality Assurance Technical<br>Support Services (QATSS) |
|-----------------|--------------------------|---|
| Fred Bearham    | Surveillance Team Member | OCRWM/QATSS   |
| Conrad Coulombe | Surveillance Team Member | OCRWM/QATSS   |

## 5.0 SURVEILLANCE SUMMARY RESULTS

The surveillance team developed the checklist questions based on remedial actions taken and recommendations made during earlier OCRWM audits, surveillances, and observations and on requirements found in the following EM-343 Standard Practice Procedures (SPPs):

|                 | SPP | I       |  |
|-----------------|-----|---------|--|
| Number/Revision |     | evision | SPP Title  |
| 1.03            | 1   | 0       | EM Organization for Waste Acceptance Process Activities of High<br>Level Waste Form Production |
| 3.01            | 1   | 3       | Training Needs Assessment  |
| 3.02            | 1   | 3       | Preparation and Conduct of Training  |
| 4.01            | 1   | 3       | Planning and Scheduling of Evaluation Activities   |
| 4.02            | 1   | 4       | Administration and Conduct of Quality Assurance Audits   |
| 4.08            | 1   | 3       | Administration and Conduct of Peer Reviews   |
| 4.12            | 1   | 3       | Quality Assurance Input to the Program Execution Guidance Document                             |
| 4.15            | 1   | 2       | Administration and Performance of Technical Reviews  |
| 4.16            | 1   | 1       | Document Reviews   |
| 5.01            | 1   | 3       | Deviations and Corrective Actions  |
| 5.07            | 1   | 2       | Evaluation and Assessment Commitment Tracking and Reporting<br>System                          |
| 6.05            | 1   | 3       | Controlled Documents   |
| 7.01            | 1   | 5       | Preparation, Transfer and Receipt of Quality Records   |
| 7.02            | 1   | 3       | Quality Records Management   |
| 8.02            | 1   | 3       | Annual Assessment of the Quality Assurance Program   |
| 8.03            | 1   | 3       | Quality Assurance Program Progress and Status Reports  |
| 10.01           | 1   | 3       | Analysis of Quality Related Trends   |

The surveillance team evaluated the effectiveness of EM-343 to institute remedial actions and address recommendations made during earlier OCRWM audits, surveillances, and observations by interviewing EM-343 and its contractor personnel and by reviewing pertinent QA records.

No corrective action was requested as a result of the surveillance; that is, no conditions adverse to quality were identified by the surveillance team or the NRC staff observer. The NRC staff observer determined that, within the scope of the surveillance, OCRWM and EM-343 are properly implementing the requirements of their QA programs, that the OCRWM surveillance was effective, and (in agreement with the surveillance team) that the EM-343 QA program is adequate in the areas examined in this surveillance.

The surveillance team made three recommendations at the exit meeting with EM-343. The team recommended that EM-343 1) audit the Technical Review Group process, 2) ensure

annual review of Memoranda of Understanding, and 3) follow-up to ensure timely reports from Savannah River.

The surveillance team noted the acceptability of the EM-343 system used to track actions taken in response to *Deviation and Corrective Action Reports* (DCARs). During the surveillance, EM-343 committed to initiate a system to track items outside the DCAR tracking system such as commitments and requests for action. The system should prevent these items from "falling through the cracks" by tracking them to completion.

#### 6.0 NRC CONCLUSIONS

The NRC staff observer determined that, within the scope of the surveillance, OCRWM and EM-343 are properly implementing the requirements of their QA programs, that the OCRWM surveillance was effective, and (in agreement with the surveillance team) that the EM-343 QA program is adequate in the areas examined in this surveillance.