



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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August 30, 1998

Mr. Russell Dyer
Project Manager
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization
Office, M/S 523.
P.O. Box 30307
North Las Vegas, Nevada 89036-0307

Dear Mr. Dyer:

On June 25, 1998, in conjunction with the U.S. Nuclear Regulatory Commission (NRC)/U.S. Department of Energy (DOE) meeting held in Las Vegas, NV, to discuss quality assurance (QA) issues, I received an overview of the recently revised DOE approach to trending quality program deficiencies. At this overview, I requested a copy of the initial report documenting the results of this effort upon completion. The purpose of this letter is to provide comments from the NRC perspective regarding DOE's revised trending quality program.

In 1997, both DOE and NRC noted that the DOE trending program was not as effective as it should have been in identifying adverse trends or patterns of deficiencies. The DOE Office of Quality Assurance recognized this as a potential problem area and documented it in Deficiency Report OQA-98-D-10. In the same time frame, the NRC On-Site Representative (OR) reports noted dissatisfaction with DOE's trending program. As a result, DOE revised its trending quality program. Consequently, the Office of Civilian Radioactive Waste Management performed an assessment of the revised approach which was documented in a July 8, 1998, report.

Based on information received during the June 25, 1998, briefing and the July 8, 1998, report description, the NRC staff has concluded that the modifications to the trending program will provide a more timely and effective means of detecting trends than the previous system. The NRC recognizes that this revised system was modeled after a system successfully implemented in a nuclear power plant application and improved upon for the present application. It appears that the program, as deficiencies are initiated, will allow both the initiator and QA Trending Coordinator to evaluate a deficiency and detect adverse trends early in the process. The trending program allows for flexibility to add or reassess trend codes as experience is gained in the trending process. This approach allows for the program to be dynamic and flexible. In most instances, trends should be identified prior to issuing the periodic trending report. As a result, corrective action should be initiated early enough in the process to initiate the necessary changes to documents, processes, training requirements, etc.

In conclusion, the NRC staff has determined that the revised trending program represents a significant improvement over the previous program. I have directed the ORs to periodically monitor the progress of the revised trending program implementation and provide me with a

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briefing on the results. It is also requested that at the next NRC/DOE management meeting, the revised trending program details be discussed. Should you have any questions on this subject, please call me on (301) 415-7437, or William Belke on (702) 794-5047.

Sincerely,

John T. Greeves, Director
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

- cc: R. Clark, DOE
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