



Department of Energy

Washington, DC 20585

APR 23 1993

Susan Zimmerman  
Nuclear Waste Project  
Evergreen Center, Suite 252  
1882 N. Caron Street  
Carson City, NV. 89710

Dear Ms. Zimmerman:

I am responding to your concern about a quality assurance issue raised following the March design control surveillance of the M&O contractor.

To summarize: You observed a surveillance interview during which an engineering manager told auditors that he was aware of problems with the design control procedures, but there was not time to have them corrected. During the bi-monthly DOE/NRC meeting, you stated that this engineering manager's comments should have been brought up during the exit meeting, but they were not.

I followed up with the auditor (Wayne Booth of my support staff) regarding your concern. Mr. Booth said the manager's comments were not mentioned during the exit meeting because additional information was gathered during the surveillance that indicated corrective action was underway. The senior engineering manager told the auditor that work was in progress to improve design control procedures. The senior manager said this design effort was the first opportunity to use these specific procedures, and experience from their use indicated that revisions are needed. I regret that you were not present during the senior manager's interview.

The auditor concluded that the engineering manager was not aware that corrective action was underway. Therefore, the auditor did not mention the observation during the exit meeting.

Mr. Booth called you on April 19 and explained the situation. He informed me that you seemed more concerned about the M&O's attitude about quality assurance issues than about whether the procedures were being revised. Mr. Booth said he believes you have a concern that quality assurance issues are not getting proper attention from M&O management, and that this larger issue should have been discussed at the exit meeting.

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PDR WASTE  
WM-11 PDR

Add: Ken Hooks H. EP

MH03 1/1  
102.2  
WM-11

As you are aware, assessing attitudes is a subjective process. An issue as large and important as an attitude about quality assurance would not be dealt with in the forum of an exit meeting. Conclusions of this nature are based on multiple occurrences rather than a single instance, such as this engineering manager's statement. In addition, major conclusions are made at the manager level, not at the auditor level. Auditors do not have the full measure of information needed to make a sweeping assessment.

I continually evaluate the quality assurance programs of Office of Civilian Radioactive Waste Management participants and contractors, using numerous methods that include audits and surveillances. I also evaluate our auditors. Should I identify a deteriorating trend in any quality assurance matter, I will take timely and appropriate action.

With regard to the conduct of this exit meeting specifically, I observed the audit team following procedures and protocol. The team presented its findings to M&O management, and the findings were discussed to ensure there were no misunderstandings.

A condition adverse to quality was identified and documented on a Corrective Action Request. The M&O must respond and indicate remedial actions. The M&O also must investigate the extent and root cause of the deficiency, and identify actions necessary to preclude recurrence. Actions are underway to correct the noted deficiency. In addition, I am enclosing a memorandum that was issued to re-enforce the need for following and upgrading procedures. I believe you'll agree that the M&O takes this matter very seriously.

Please call me if you have questions or comments at (202) 586-8858.

Sincerely,



Donald G. Horton, Director  
Office of Quality Assurance  
Office of Civilian Radioactive  
Waste Management

Enclosure

cc:

L. Barrett, RW-1  
F. Peters, RW-2  
C. Gertz, RW-20  
D. Shelor, RW-30  
R. Robertson, TRW  
K. Hooks, NRC ✓  
D. Foust, TRW, NV.  
P. Niedzielski-Eichner, Nye County, NV.  
E. von Tiesenhausen, Clark County, NV.  
J. Pitts, Lincoln County, NV.  
W. Offutt, Nye County, NV.  
J. Hayes, Esmerald County, NV.  
C. Shank, Church County, NV.  
G. Derby, Lander County, NV.  
J. Bingham, Clark County, NV.  
M. Baugham, Lincoln County, NV.  
D. Bechtel, Clark County, NV.  
R. Michener, Inyo County, NV.  
B. Raper, Nye County, NV.  
F. Mariani, White Pine County, NV.  
V. Poe, Mineral County, NV.  
R. Campbell, Inyo County, NV.  
B. Mettan, Inyo County, NV.

**Interoffice Correspondence**  
Civilian Radioactive Waste Management System  
Management & Operating Contractor



TRW Environmental  
Safety Systems Inc.

**Subject**  
Compliance with QA Program  
Requirements

**Date**  
April 22, 1993  
VA.GM.RLR.4/93.024

WBS: 93.07  
QA-N/A  
From  
R.L. Robertson

**To**  
All M&O Employees

cc

**Location/Phone**  
TES1/8588  
204-8600

**M&O compliance with QAW procedures has been less than satisfactory as indicated by the recent QA audits.**

**In case there is any misunderstanding concerning the responsibilities of M&O personnel performing Quality Affecting Work (QAW) under both the M&O and DOE QA Programs, I want to make the following perfectly clear:**

1. **If you find that following a QA procedure will not allow you to perform your work as required, you will stop work and notify your supervisor immediately. You and your supervisor will immediately:**
  - a. **Identify consequences of following the procedure precisely as written.**
  - b. **Identify changes required to make the procedure proper for the work to be performed.**
  - c. **Notify M&O QA of your recommendations.**
  - d. **Not proceed with QAW until a revision to the procedure is approved under the QA Program.**
2. **If a QA procedure is not "user friendly", but will allow you to continue work, you will perform this work using that QA procedure as written. in parallel, notify your supervisor and taken actions as described in 1a, 1b, and 1c above.**
3. **If you are to perform work that is Quality Affecting (QAW) and find that approved QA procedures do not exist, you will not undertake this work until the required QA procedures are approved and available to you. You will immediately notify your supervisor and M&O QA of the need for new procedures.**

**The integrity of the OCRWM and M&O Quality Assurance programs depends on individual compliance, identification of needs, recommendations for improvements and priorities regarding procedures for QAW.**

**Each and every M&O employee performing QAW on this program, who knowingly does not conform to the requirements of the QA Program and, in particular, items 1, 2, & 3 above, will be subject to disciplinary action, which may include dismissal from this program.**