



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

August 7, 1996

Mr. Bruce Mabrito, Director
Quality Assurance
Center for Nuclear Waste Regulatory Analyses
6220 Culebra Road, Building 189
San Antonio, TX 78238-5166

SUBJECT: OBSERVATION AUDIT OF CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

Dear Mr. Mabrito:

From July 22-26, 1996, a member of the U.S. Nuclear Regulatory Commission quality assurance (QA) staff participated as an observer in the Center for Nuclear Waste Regulatory Analyses (CNWRA) QA Audit No. 96-01 conducted in San Antonio, Texas. The NRC staff evaluated this performance-based audit to gain confidence that the CNWRA is effectively implementing the requirements of its QA program. This letter transmits Observation Audit Report OA-96-06 for the CNWRA audit.

The audit, which was performed as part of the CNWRA's regular audit program, was used to evaluate the implementation of QA controls associated with CNWRA QA programmatic and technical activities. All fourteen applicable QA programmatic areas and five key technical areas were audited. The key technical areas audited included: 1) Radionuclide Transport, 2) Near-Field Environment, 3) EPA Standards, 4) Structural Deformation, and 5) Total System Performance and Technical Integration.

The NRC staff based its evaluation of the audit process and the CNWRA QA program on: 1) discussions with and direct observations of a) the auditors and technical specialists of the audit team [most of whom were on loan from the CNWRA's parent organization, Southwest Research Institute], and b) CNWRA staff being audited; and 2) reviews of pertinent audit documentation such as the audit plan, the audit checklist, and other CNWRA documents. The NRC staff has determined that, overall, CNWRA Audit No. 95-01 achieved its purpose of evaluating the implementation of controls of QA programmatic and technical activities. The audit was conducted in a professional manner. The audit team was well qualified and familiar with the QA requirements of the CNWRA program. The individual assignments and checklist items were adequately described in the audit plan.

The NRC staff agrees with the audit team's preliminary findings that, overall, the CNWRA QA program controls are being adequately implemented in the areas that were evaluated. In addition, the staff believes that the CNWRA audit was thorough and effective. The qualifications of CNWRA technical staff and the technical adequacy of the procedures and work products are subject to continuing evaluation by NRC technical staff.

CNWRA QA personnel should continue to monitor the QA program to ensure that future implementation is carried out in an adequate manner. The NRC staff

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expects to participate in this monitoring as observers and may perform its own independent audit at a later date to assess the adequacy and effectiveness of the CNWRA QA program.

A written response to this letter or the enclosed report is not required. If you have any questions, please call Jack Spraul on (301) 415-6715.

Sincerely,



Shirley L. Fortuna
NRC Program Element Manager
CNWRA Operations

Enclosure: As stated

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/S/

Shirley L. Fortuna
NRC Program Element Manager
CNWRA Operations

Enclosure: As stated

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