



Department of Energy  
Washington, DC 20585

DEC 11 1990

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K. H. H. H.*

Mr. Robert Browning, Director  
Division of High-Level  
Waste Management  
Office of Nuclear Material  
Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Browning:

This letter is to notify you of the Department of Energy's (DOE) acceptance of the Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance (QA) Program and to request the NRC's acceptance, consistent with our agreements regarding OCRWM program participant QA program acceptance. It is the position of DOE that the OCRWM QA program is acceptable to initiate activities supporting new site characterization associated with Midway Valley Trenching and Calcite-Silica activities. The basis for this acceptance is in the enclosed DOE letter; Horton to Shelor, dated December 7, 1990.

If you have any questions, please contact me at (202) 586-6046.

Dwight Shelor  
Acting Associate Director for  
Systems and Compliance  
Office of Civilian Radioactive  
Waste Management

Enclosures

cc:  
C. Gertz, YMP  
R. Loux, State of Nevada  
S. Bradhurst, Nye County, NV  
D. Bechtel, Clark County, NV  
M. Baughman, Lincoln County, NV

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Department of Energy  
Washington, DC 20585

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ACCEPTANCE OF THE OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM)  
QUALITY ASSURANCE (QA) PROGRAM

Dwight E. Shelor, Associate Director, Office of Systems and Compliance,  
HQ (RW-30) FORS

References: (1) Letter, Linehan to Shelor, dtd. 12/3/90  
(2) Letter, Horton to Bartlett, dtd. 11/23/90

The purpose of this memorandum (current as of the date of this letter) is to document the bases and request the acceptance of the OCRWM QA Program. This request addresses the five conditions for acceptance of the U.S. Department of Energy (DOE) QA Program as described by the U.S. Nuclear Regulatory Commission (NRC) in the March 21, 1990, Bimonthly DOE/NRC Quality Assurance meeting. The acceptance of the OCRWM QA Program is based on the following:

1. The NRC has accepted the OCRWM QA Program Documents on the basis of an NRC Safety Evaluation letter (see reference 1). The six NRC staff open issues identified in this letter are listed as exceptions and are discussed later on in this letter.
2. The Office of Quality Assurance (OQA) has completed the QA Program Qualification Audit 90-I-01, which was conducted at the OCRWM Headquarters facilities in Washington, D.C., from October 15-19, 1990, and at the Yucca Mountain Site Characterization Project Office (YMPO) in Las Vegas, Nevada, from October 22-26, 1990 (see reference 2). This audit concluded that the OCRWM QA Program is adequate for the initiation of quality-affecting activities. Implementation of the OCRWM QA Program has not changed in either scope of work or level of effort since that audit.
3. All open OCRWM QA Program deficiencies have been reviewed and no items were found that could have a technical or quality impact on output products, with three exceptions. These exceptions are Severity Level I Standard Deficiency Report (SDR) 592 and Corrective Action Requests (CARs) HQ-91-009 and HQ-91-011. Efforts are currently ongoing to resolve the identified conditions and OQA has made the following determinations:
  - a. SDR 592 is a Project Office SDR that was written to identify and correct deficiencies in records that have been received by the Local Records Center. It has been evaluated as having no significant impact on the overall implementation of the OCRWM QA Program or new site characterization activities.

- b. CARs HQ-91-009 and HQ-91-011 are OCRWM Headquarters CARs and are two of the CARs that were identified in Qualification Audit 90-I-01. A description of these deficiencies is included in Enclosure 1 (Recommended CAR Closure Status). They have been evaluated as having no impact on the start of two proposed upcoming site characterization efforts, Midway Valley Trenching and Calcite-Silica Activities. They are also listed as exceptions and discussed later on in this letter.

NOTE: For this review, the Severity Level Checklist criteria established in YMPO Quality Management Procedure (QMP)-16-03, Revision 1, and OCRWM Quality Assurance Administrative Procedure (QAAP) 16.1, Revision 3, were used to determine impact of the open deficiencies (SDRs and CARs, respectively). If the deficiency did not meet Severity Level I criteria, it was regarded as not being significant or not having significant impact on the continued implementation of the OCRWM QA Program.

4. There are no areas of the OCRWM QA Program affected by a stop work at the present time. However, Qualification Audit 90-I-01 identified actions that were recommended to take place prior to the start of site characterization activities. These actions have been identified as exceptions and are discussed later on in this letter.
5. The Privacy Act issue did not have an impact on acceptance of the OCRWM QA Program.

In summary, DOE has determined the effectiveness of the OCRWM QA Program by audits and surveillances. The activities examined and the results of the surveillances performed since the October 1990 Qualification Audit have verified the effectiveness of the OCRWM QA Program for the start of two proposed upcoming site characterization efforts, Midway Valley Trenching and Calcite-Silica Activities.

Therefore, based on the information presented, the OQA has concluded that the OCRWM QA Program is in compliance with the applicable requirements of the OCRWM Quality Assurance Requirements Document (QARD), Revision 4, and the Quality Assurance Program Description Document (QAPD), Revision 3, and is acceptable to initiate new site characterization activities with the following exceptions:

1. NRC Open Issues on OCRWM QA Program Documents - The NRC has identified six (6) open issues in their safety evaluation letter accepting the OCRWM QA Program documents. OQA has evaluated these issues and has determined that they will have no impact on the start of two proposed upcoming site characterization efforts, Midway Valley Trenching and Calcite-Silica Activities. In addition, evaluations will be made prior to the start of any other work, as long as these issues remain open.

2. Qualification Audit 90-I-01 Recommended Actions - The Audit Qualification Audit recommended specific surveillances be performed and CARs to be closed prior to the start of site characterization. These surveillances and CARs are identified, along with their present status, in enclosure 1 (Recommended CAR Closure Status) and enclosure 2 (Recommended Surveillance Status).

OQA will verify and document resolution of these exceptions as they are completed. In addition, OQA will notify the NRC staff of the resolution of those exceptions, and receive NRC acceptance of the appropriate exception resolution prior to the start of any new site characterization work that might be adversely affected by these exceptions. It is OQAs intent to resolve all exceptions and request NRC acceptance of this action so all conditions on the acceptance of the OCRWM QA Program can be removed.

Please transmit this letter, with enclosures, to the NRC for their review.

If you have any questions, please contact Nancy A. Voltura at (702) 794-7972 or FTS 544-7972, or Richard E. Spence at (702) 794-7543 or FTS 544-7543 of the Yucca Mountain Quality Assurance Division staff.



Donald G. Horton, Acting Director  
Office of Quality Assurance

OQA:NAV-1139

Enclosures:

1. Recommended CAR Closure Status
2. Recommended Surveillance Status

cc w/encl:

- H. Washington, HQ (RW-3) FORS
- D. Butler, HQ (RW-13) FORS
- J. W. Gilray, NRC, Las Vegas, NV
- J. D. Stewart, NTSO
- A. R. Veloso, NTSO

RECOMMENDED CAR CLOSURE STATUS

(from Qualification Audit 90-I-01)

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ENCLOSURE NO. 1

CAR NUMBER	ASSIGNED TO	DESCRIPTION	STATUS
HQ-91-002	Headquarters (RW-30)	- Deficiencies with interface control.	Response accepted
HQ-91-007	Headquarters (RW-30)	- Improper document control of WMSR and WMSO.	Response accepted
HQ-91-008	Headquarters (RW-3)	- Untimely actions for open items relative to CAR/DR/OBSs.	Response being evaluated
HQ-91-009	Headquarters (RW-10)	- Inadequate description of the records storage facility.	Awaiting response
HQ-91-011	Headquarters (RW-3)	- Lack of HQ internal or external audits.	Response being evaluated
YM-91-005	Project Office (QAD)	- No approved matrix for OCRWM procedures and QARD/QAPD.	Response accepted
YM-91-006	Project Office (Training)	- Training system does not ensure adequate training.	Response accepted
YM-91-007	Project Office (EDD)	- Flow down of technical requirements not clear.	Response being evaluated
YM-91-008	Project Office (EDD)	- Inputs to YMP/CM-007 not always traceable.	Response being evaluated
YM-91-009	Project Office (EDD)	- Inappropriate reviewer selection.	Response being evaluated

RECOMMENDED SURVEILLANCE STATUS

(from Qualification Audit 90-I-01)

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ENCLOSURE NO. 2

SURVEILLANCE NUMBER (DATE)	SUBJECT	SUMMARY OF RESULTS	DEFICIENCY REPORTS ISSUED
To be scheduled	Control of the Technical Baseline (including the change control process). (HQ)	To be performed	To be determined
To be scheduled	Corrective Action System. (HQ)	To be performed	To be determined
To be scheduled	Quality Records Center. (HQ)	To be performed	To be determined
To be scheduled	Program Overview (audits and surveillances). (HQ)	To be performed	To be determined
YMP-SR-91-006 (11/29/90 and 12/3-4/90)	Preparation and Review of the Technical Requirements for the Yucca Mountain Project (YMP/CM-0007). (Project Office)  Sandia National Laboratories (SNL) activities relative to YMP/CM-0007. (Project Office)	The report for this surveillance has not yet been issued. However, preliminary results indicate that these activities have been performed in accordance with applicable procedures.	None
YMP-SR-91-006 (10/20 Through 11/26/90)	Training. (Project Office)	This surveillance determined that individuals assigned to perform a technical, regulatory, management, or quality assurance review of YMP/CM-0007, (R-2) had the requisite training.	None