U. S. NUCLEAR REGULATORY COMMISSION

OBSERVATION SURVEILLANCE REPORT NO. 92-S2

OF THE OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

SURVEILLANCE OF THE MANAGEMENT AND OPERATING CONTRACTOR

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1.0 INTRODUCTION

On September 9 and 10, 1992, the U.S. Department of Energy, Office of Civilian Radioactive Waste Management (OCRWM), conducted Quality Assurance (QA) Surveillance No. HQ-SR-92-12 of the Management and Operating Contractor (M&O) QA program. The surveillance team conducted interviews with M&O staff in Vienna, VA. A member of the NRC staff participated as an observer on this surveillance.

2.0 PURPOSE

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

3.0 SCOPE

The surveillance, HQ-SR-92-12, evaluated the packages the M&O had prepared to document the closure of the hold points which resulted from the readiness reviews of November 1991 through February 1992 at the M&O offices at Las Vegas, NV, Vienna, VA, and Charlotte, NC. The readiness reviews were conducted to determine whether the M&O had an effective QA program in place before it initiated quality-affecting activities.

The scope of this surveillance was limited to evaluating the procedural controls and implementation associated with the closure of M&O readiness review hold points. The surveillance did not delve into the closure of open items that were not classified as hold points, nor did it have data which would allow it to investigate the 2 hold points which had not been closed at the time of the surveillance.

4.0 SURVEILLANCE PARTICIPANTS

4.1 NRC

Jack Spraul	Observer

4.2 DOE/OCRWM

W. R. (John) Marchand	Surveillance Team Leader	Weston
Lester W. Wagner	Surveillance Team Member	CER Corp.

5.0 SURVEILLANCE SUMMARY RESULTS

The surveillance team developed the checklist questions based on the requirements found in Revision 0 of M&O procedure QAP-2-6, "Readiness Review," November 18, 1991. Although Revision 1 of this procedure had been issued, the form used to describe the hold points, assign corrective action, and close the hold points came from Revision 0. The surveillance team evaluated the effectiveness of the process for closing hold points by interviewing M&O personnel and reviewing pertinent QA records, particularly the packages the M&O had prepared to document the closure of the hold points that resulted from the readiness reviews of November 1991 through February 1992 at the M&O offices at Las Vegas, NV, Vienna, VA, and Charlotte, NC.

The readiness reviews had identified 66 open items, 31 of which had been classified as hold points which required acceptable corrective action before activities affected by the hold point could proceed. Of the 31 hold points, 29 had been closed by the M&O at the time of the surveillance. The surveillance team recommended several actions which were taken by the M&O during the surveillance to improve several of the closure packages. For example, while the procedure requires that the readiness review team leader document closure of each hold point, the originator of the open item reports had been performing this function. The new open item report form in Revision 1 of the procedure has a signature block for the readiness review team leader's closure signature to correct this problem on future readiness reviews.

In addition, as a result of the surveillance, the M&O initiated a Corrective Action Report to correct documentation discrepancies discovered during the surveillance. The discrepancies are not significant in terms of the overall M&O QA program, and they do not degrade the quality of M&O activities. No corrective action requests were developed by the surveillance team.

6.0 PERSONS CONTACTED DURING THE SURVEILLANCE

R. J. Brackett	M&O QA Manager
Frank E. Nash	M&O Manager, QA Audits
W. J. Waggoner	M&O Staff

7.0 NRC CONCLUSIONS

The NRC determined that the surveillance was effective and agreed with the surveillance team that the closure packages were generally acceptable to document actions taken to close the hold points. As a result of the surveillance, the M&O initiated a Corrective Action Report to correct documentation discrepancies discovered during the surveillance. The discrepancies are not significant in terms of the overall M&O QA program, and they do not degrade the quality of M&O activities.

The NRC staff believes that Revision 1 of the M&O's procedure QAP-2-6 "Readiness Reviews," has weakened the procedure in that it no longer requires that the "Attribute List" (that is, the list of prerequisites to be verified during a readiness review) be a QA record to be maintained in accordance with the M&O procedure for records management. We recommend that this requirement be reinstated.

The NRC staff also recognizes a good practice in that the M&O staff preparing the closure packages documented actions beyond those specifically required for closure of the hold point. That is, several Open Item Reports required only a revised "Mined Geological Procedure" or a revised "Monitored Retrievable Storage Facility Procedure." In cases where the revised procedure had been superseded by an M&O QA procedure, the closure package includes not only the revised procedure but also the superseding M&O QA procedure and indicates where the hold point is covered in it. We believe that this extra effort and actions similar to it will pay dividends at the time of licensing.