

DOE RESPONSES TO NRC AUDIT

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JUN 02 1989

Mr. Ralph Stein, Associate Director
Office of Systems Integration and Regulations
Office of Civilian Radioactive Waste Management
U. S. Department of Energy, RW-24
Washington, D. C. 20545

Dear Mr. Stein:

SUBJECT: DOE RESPONSES TO NRC OBSERVATIONS OF AUDIT 88-01

Your letter of December 28, 1988 to B. J. Youngblood transmitted DOE, Richland Office (RL) responses to the seven NRC concerns with DOE Audit 88-01 identified in Appendix A to our May 24, 1988 Observation Audit Report (copy attached). Five of these seven concerns were discussed at the July 7, 1988 DOE/NRC meeting on QA open items. The five concerns are identified as Item #10 (Concern #1), Item #11 (Concern #3) and Item #12 (Concerns #5, 6 and 7) in Enclosure 2 to the meeting minutes, transmitted to you by my letter dated July 15, 1988.

The responses to Concern #1 and Concern #3 are identified in your December 28, 1988 letter as the OCRWM responses to Items #10 and #11. Your letter does not indicate whether OCRWM concurs with the RL responses to Concerns #2, 4, 5, 6 and 7.

The NRC staff has evaluated the OCRWM responses to Item #10 and Item #11. Item #10 is closed in the absence of any present evidence of an adverse effect on quality due to the contractual complexity. Item #11 is closed; the NRC included evaluation of auditor training in the HLWM Observation Audit Procedure, Revision 1, May 25, 1988; subsequent NRC observations of DOE audits have indicated that DOE auditor training has improved. The NRC will continue to evaluate DOE auditor training when observing DOE audits.

Although OCRWM did not specifically endorse the RL responses to Concerns #2 and #4, events have resolved these concerns. The NRC staff considers Concern #2 closed, since subsequent DOE audits observed by the NRC have generally evidenced adequate planning and coordination. Concern #4 is closed based on DOE agreement to provide checklists to the NRC two weeks prior to any audit which will be observed by the NRC.

DOE should specifically indicate to the NRC whether the responses to Concerns #5, 6 and 7 are the OCRWM response to Item #12 of Enclosure 2 to my July 15, 1988 letter. The NRC has questions on the RL responses to these three concerns, and prefers to base its evaluation on the stipulated OCRWM responses. We also request that DOE inform us of the next audit of Level I TUFF activities at PNL so that we can determine if another NRC observation is needed.

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If you have any questions, please contact Brian Thomas on (301) 492-0435.

Sincerely,

ORIGINAL SIGNED BY

John J. Linehan, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management

Enclosure: Appendix A

- cc: R. Loux, State of Nevada
- M. Baughman, Lincoln County, NV
- S. Bradhurst, Nye County, NV
- D. Bechtel, Clark County, NV
- C. Gertz, DOE/Nevada
- K. Turner, GAO

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Appendix A**Concerns With Respect to the Conduct of
the Joint DOE-HQ/DOE-RL Audit**

As discussed in the text of this report, the following concerns represent areas where the NRC observer believes the DOE-HQ/DOE-RL audit program can be improved:

- (1) Clarifying the rights of access between Lawrence Livermore National Laboratory and its subcontractor Pacific Northwest Laboratory. As currently structured, LLNL's access to PNL appears limited to those times when an audit is planned by either DOE-HQ or DOE-RL and LLNL may be asked to participate;
- (2) Planning and coordinating the audit in such a manner as to provide a more effective audit process;
- (3) Coordinating the overall audit-related training program to provide consistency in the topics presented so as to achieve a consistent level of understanding of the audit process;
- (4) Coordinating the development of the audit checklist with sufficient time to review and incorporate the technical program areas that are to be addressed;
- (5) Reviewing QA program documents for consistency with program endorsed consensus standards prior to implementation;
- (6) Assuring that DOE program documents (i.e audit procedures) are subject to appropriate document control measures;
- (7) Ensuring that approved QA program documents describe the audit process, the roles and responsibilities of audit team members and any audit program criteria or definitions which are to be implemented in conducting and documenting the audit activity.