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M E M O R A N D U M

TO: DISTRIBUTION

FROM: SUSAN ZIMMERMAN *SWZ*
NWPO QA MANAGER

DATE: DECEMBER 1, 1988

SUBJECT: STATE OF NEVADA NWPO OBSERVATIONS OF DOE/YMPO QA AUDIT
OF LAWRENCE LIVERMORE NATIONAL LABORATORY, OCTOBER 24-
28, 1988

The purpose of this memo is to relate the State of Nevada Nuclear Waste Project Office observations and concerns regarding the DOE/YMPO Quality Assurance audit of Lawrence Livermore National Laboratory (LLNL) on October 24-28, 1988.

Comments on the Audit Process

This audit ran very smoothly. It was one of the better audits the State has attended. The audit team leaders were in control and lead the audit. The afternoon caucuses were very good, with effective interplay between the audit team members.

The State does take issue with the fact that the audit team did not audit LLNL to NVO-196-17, Rev. 5, as has been done with the other contractors, but chose to audit the LLNL compliance with Rev. 4, since LLNL had not issued their QA program that meet Rev. 5, although this LLNL QA program was approved by DOE in June, 1988. Given this fact, this audit was almost pointless and the time and effort wasted.

Comments on the LLNL QA Program

Given the results of the audit, the only appropriate action that could be taken by the audit team was to recommend a stop-work order be imposed on LLNL. The status of the LLNL QA program was such that no other action was possible. LLNL is 3 revisions out of date with

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the current DOE QA requirements and had not issued a June, 1988, DOE-approved LLNL QA program for use by the time of this audit. The reason given by the LLNL QA Manager was that, because new requirements were coming out soon, it was better to wait for a final version than to try to keep up with all the new revisions of the DOE QA program. Of course, work was continuing under the wrong QA requirements for this time period. This is a prime example of a lack of commitment to quality assurance by LLNL management and QA organization.

Specific comments on the LLNL QA program are as follows:

1. The LLNL training program is ineffective, almost non-existent. An attempt was made just prior to the audit to give training to some of the LLNL staff; however, this training was too late and too little. Conversations with some of the technical staff indicated that the staff understanding of the overall QA program and its requirements was nebulous, at best.
2. LLNL appears to be placing many activities under Quality Level 3 to keep from having to deal with the requirements of Level 1 or 2, even if the work is of a standard nature with existing procedures. They also seem to think that any data or results from this Level 3 work can be bumped up to Level 1 as needed, by the use of the NRC NUREG-1298 on the Qualification of Existing Data.
3. LLNL technical staff seems to think that any data collected under a Quality Level 1 program is better "technically" than other data and that more weight must be given to this data in their work. This indicates a lack of understanding of Quality Levels and Quality Assurance, in general.
4. The overall attitude of the LLNL management and technical staff was very cavalier toward the audit and to quality assurance.