ROBERT R. LOUX Executive Director



AGENCY FOR NUCLEAR PROJECTS NUCLEAR WASTE PROJECT OFFICE

Capitol Complex
Carson City, Nevada 89710
(702) 885-3744

MEMORANDUM

TO:

DISTRIBUTION

FROM:

SUSAN ZIMMERMAN GUT

NWPO QA MANAGER

DATE:

NOVEMBER 28, 1988

SUBJECT:

STATE OF NEVADA NWPO OBSERVATIONS OF DOE/YMPO QA AUDIT

OF LOS ALAMOS NATIONAL LAB, OCTOBER 3-7, 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 Los Alamos National Laboratory on October 3-7, 1988.

Comments on the Audit Process

Observations regarding the audit process for 88-08 are as follows:

- 1. The audit was negatively affected because of the lack of prior review by the audit team of the most current Los Alamos implementing procedures. Because of this, the checklist could not be based on the appropriate procedures and time was lost during the audit by the auditors having to perform a rushed review of the procedure while performing the audit.
- 2. At the start of the audit, it appeared that Los Alamos was in more control of the audit than the audit team. Attempts were made by Los Alamos to prevent access to activities for audit; limit the scope of portions of the audit; distract the auditors with offered tours of facilities. As the audit progressed, none of the above mentioned attempts proved successful; however, this did not deter Los Alamos from continuing these attempts. The audit team leaders could have exerted more control at the beginning of the audit to alleviate these attempts.

8812120134 881123 PDR WASTE WM-11 PDC 102.7 NH03 Wm-1 3. As has been usual in previous audits, the afternoon caucuses were very beneficial as a forum for discussing potential SDRs and observations. However, we take issue with the attempt by one of the SAIC technical specialist, Steve Mattson, to take control a session and attempt to change the criteria for writing an SDR to fit his idea of the purpose and function of the audit and the role QA has in the program. The SDR under consideration was outside of his technical area for the audit. Discussion of the merit of SDRs is one of the purposes of the caucus, but this attempt went beyond discussion and into personal beliefs on the merits of quality assurance. Given this action, we are concerned with the adequacy of the performance of his portion of the technical audit.

Comments on the Los Alamos QA Program

Overall, the Los Alamos QA program appears so confused that control of previous work, current work and future work is questionable.

- 1. It was obvious during the audit that DOE should not have lifted the 1986 Stop-Work order on Los Alamos until their QA program was current to the most recent DOE requirements and adequately implemented.
- 2. The Los Alamos QA support contractor, LATA, did not seem familiar with the QA program. The majority of the auditors' questions were referred to the QA Manager, Mr. Henry Nunes. This caused an impact on the audit because the auditors had to wait for Mr. Nunes to be available to answer questions.
- 3. The Los Alamos training program is inadequate. Conversations with Los Alamos technical staff indicated that the training was ineffective and confusing. Some of the staff did not know what the training sessions had covered or what they were supposed to have covered. There was confusion by some of the technical staff as to what Quality Level was assigned to the work they were performing and what was required.
- 4. Los Alamos does not plan to develop position descriptions for their staff until sometime in the first quarter of CY 1989. This leaves the qualifications of the current staff and any previous staff that had worked on this project open to question.
- 5. There was difficulty in tracing data in finished reports back to the original source, i.e. scientific notebooks.
- 6. The use of the corrective action system by the Los Alamos QA program inappropriate and ineffective.

One incident during the audit caused the State observers much concern. Mr. Henry Nunes, the Los Alamos QA Manager, made the statement that he "taught the staff how to mute the effect of an audit". This statement was made in front of a SAIC auditor, a State observer, a DOE-HQ observer, and a SAIC observer. Given certain actions taken by Mr. Nunes and his staff during the audit, the statement seemed entirely feasible. The State observer was then informed by one of the audit team members that Mr. Nunes had made this same statement at a QA Managers meeting in Las Vegas. Statements such as this have no place in this program, whether they are true or not. The perception given by this type of statement is that Los Alamos either does not understand the role quality assurance must play in this program, or does not care. Either way, it is not an acceptable attitude for this program.