



Department of Energy

Washington, DC 20585

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Mr. John Linehan, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level
Waste Management
Office of Nuclear Materials
Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Linehan:

The purpose of this letter is to transmit DOE responses to observations generated by members of the NRC during the DOE/Yucca Mountain Project Audit (No. S89-1) of Holmes & Narver, Inc. (H&N), conducted during the week of November 1, 1988. This is in accord with the commitment (QA-G-1) made at our July 7, 1988, meeting to provide the NRC with responses to comments in observation audit reports.

Enclosed please find DOE's responses to observations made by NRC in the audit observation report of the subject audit and transmitted by letter dated January 23, 1989, from John Linehan to Ralph Stein.

Questions should be addressed to me on 586-1462 or to Dwight Shelor of the Office of Quality Assurance on 586-8858.

Sincerely,

Edward Coyne for

Gordon Appel, Chief
Licensing Branch

Enclosure: Response to NRC Observation Report for U. S. Department of Energy/Yucca Mountain Project Audit S89-1/Holmes & Narver, Inc.

cc: J. Kennedy, NRC
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RESPONSE TO

NRC OBSERVATION REPORT FOR

U.S. DEPARTMENT OF ENERGY/YUCCA MOUNTAIN PROJECT

AUDIT S89-1/HOMES & NARVER, INC.

The following provides the Project Office responses to observations generated by members of the Nuclear Regulatory Commission (NRC) during observation of the U.S. Department of Energy/Yucca Mountain Project Audit (No. S89-1) of Holmes & Narver, Inc. (H&N). The audit was conducted during the week of November 1, 1988. The NRC audit Observation Report (Letter, Linehan to Stein, dtd. 1/23/89) listed three observations regarding the audit. The observations are summarized below along with responses:

OBSERVATION NO. 1

The H&N staff explained how their overall design process is implemented from start to completion (see Enclosure 1). The NRC staff observed that if any portion of this design were changed, there were no definitive controls covering the impact of this change on other aspects of the design. In this regard, consideration should be given to develop controls to improve this area. It appeared to the NRC staff that the audit team did not reach this conclusion.

RESPONSE:

The Project Office disagrees with the NRC statement concerning the lack of controls by H&N to assure that if any portion of the design were changed, that the effects of this change would be considered on the overall design. The H&N QAPP, Rev. 1 (in effect at the time of the audit), Para. D.4, states, "Changes to previously verified designs shall require verification including evaluation of the effects of those changes on the overall design." Although H&N had not addressed this requirement in their procedure NWSI-014, "Design Verification", Rev. 0, the omission was identified by the audit team on Observation No. S89-1-11 and by H&N on Corrective Action Report (CAR) N88-A-009 (dtd. 11/03/88). An observation was written, in-lieu-of an SDR, because H&N had previously addressed the identified deficiency; therefore, the observation served to track corrective action of the H&N CAR. Procedure YMP-014 has subsequently been revised to incorporate the requirements in Revision 2, 2/12/89. It should be noted that no design verification had taken place prior to the audit.

In summary, the audit team was aware that H&N procedure NWSI-014 did not address the aforementioned H&N QAPP requirement, and the audit team took the appropriate action to address the deficiency by issuing Observation No. S89-1-11.

OBSERVATION NO. 2

Much of the technical data in the Work Breakdown Structure Packages pertained to the electrical discipline. During this audit, the technical auditing specialist in this discipline was unavailable due to previous workload commitments and priorities. Consequently, in the electrical area, checks of the calculations and verification of design analysis were not performed. For future audits, there should be sufficient planning to allow technical auditors to perform technical reviews; e.g., calculations, specification checks, etc.

RESPONSE:

The Project Office agrees with this observation. The technical specialist's withdrawal from the audit was at the last minute, making it virtually impossible to replace him on such short notice. It is and has been the Project Office's intent to utilize technical specialists who are knowledgeable in the areas that are within the scope of the audit.

OBSERVATION NO. 3

The Audit Plan contained a Deficiency Matrix indicating the appropriate SDR number and the applicable program element previously identified through DOE/YMPO audits. The use of the Deficiency Matrix was a recommendation by the NRC staff resulting from the USGS audit in June 1988. The corrective actions and close-out for these deficiencies should be, when applicable, verified more thoroughly and not just accepted as written, as they were in this audit. (Section 4.4)

RESPONSE:

The Project Office does not agree with this observation. The subject matrix (attached) was used to demonstrate in which areas previous problems had been identified. It can be noted from the matrix that 11 of the 12 SDRs had been previously closed. The Project Office does not intend to re-verify corrective actions once they have been closed; however, previous program weaknesses are considered in the planning stage of the audit. The one open SDR, No. 117, was reviewed during the audit to verify corrective actions. Based upon that review, the corrective actions were found to be unsatisfactory. SDR No. 117 was closed and Revision 1 was issued to document the unsatisfactory condition. Additionally, in Section 4.4 of the NRC report a concern was expressed that SDRs should be elevated to the next higher management level when SDR responses are inadequate. This concern is being addressed during the revision of QMP-16-01 "Standard Deficiency Reporting System," which is currently under way.

The Project Office agrees with the second statement and is currently evaluating QMP-16-01, "Corrective Action" and QMP-16-03 "Standard Deficiency Reporting System" to provide for a more meaningful method of elevating deficiencies to higher management levels.