



Department of Energy
Washington, DC 20585

AUG 10 1989

John J. 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:

This letter responds to your letter to Ralph Stein dated June 2, 1989, concerning previous Department of Energy (DOE) responses on DOE Audit 88-01.

With respect to concerns #2 and #4, the Office of Civilian Radioactive Waste Management (OCRWM) concurs with the NRC staff that events have resolved these concerns and that they should be considered closed.

With respect to concerns #5, #6, and #7 (i.e., item 12 of Enclosure 2 to your July 15, 1988, letter), the following is the OCRWM response to item 12:

ITEM 12

DOE QA Program documents should be consistent with endorsed consensus standards, are subject to document control measures, and describe the audit process, program criteria and team responsibilities.

RESPONSE

- o DOE/RW 0214, Quality Assurance Requirements (QAR), and Quality Assurance Plan NNWSI 88-9, Rev. 2, Section 6, "Document Control" require program documents affecting quality to be prepared, revised, reviewed, approved, and issued in a prescribed and controlled manner.

The OCRWM program participants implement document control activities as prescribed in their approved QA programs, in accordance with these Program QA requirements.

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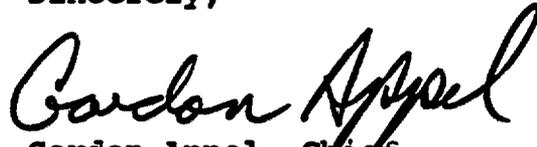
- o DOE/RW 0214, Quality Assurance Requirements (QAR), and Quality Assurance Plan NNWSI 88-9, Revision 2, Section 5, "Instructions, Procedures and Drawings" require the originating organization to perform an independent review of procedures to assure technical adequacy and inclusion of quality requirements.
- o OCRWM's position on lead auditor certification in accordance with NQA-1 (1986) is as described in OCRWM QAAP 18.1, "Certification of Audit Personnel" (copy enclosed). Section 6.2.3 of this QAAP states (in part): "The perspective Lead Auditor shall have participated in a minimum of five (5) quality assurance audits within the three (3) years prior to qualification. Audits performed prior to certification by OCRWM may be used to meet this requirement."
- o It should be noted that under the superseded OGR Plan, OGR/B-3, QIP 18.3, "Auditor Training, Qualification and Certification", OCRWM certification of lead auditors could be based on a review, and verification if appropriate, of previous employer certification documentation, provided the certification program met the requirements of QIP 18.3. All OCRWM lead auditors previously certified under OGR/B-3, QIP 18.3 will maintain their proficiency in accordance with QAAP 18.1

The above approach is consistent with accepted industry practice.

Regarding your question on the next DOE audit of Level I TUFF activities at PNL, no specific date has been determined. A schedule for future audits will be prepared once the DOE/HQ and Project Office qualification audits are completed.

Should you have any questions on this matter, please call me on 586-1462 or Dwight Shelor in the Office of Quality Assurance on 586-5851.

Sincerely,


Gordon Appel, Chief
Licensing Branch

Enclosure: OCRWM 18.1 Certification of Audit Personnel

cc: J. Kennedy, NRC
S. Zimmerman, State of Nevada
D. Bechtel, Clark County, NV
M. Baughman, Lincoln County, NV
S. Bradhurst, Nye County, NV