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M E M O R A N D U M

TO: DISTRIBUTION  
FROM: SUSAN W. ZIMMERMAN <sup>SWZ</sup>  
NWPO QA MANAGER  
DATE: SEPTEMBER 6, 1988  
SUBJECT: STATE OF NEVADA NWPO OBSERVATIONS ON PRIOR DOE QA AUDITS

This memo is to relate State of Nevada NWPO observations and concerns regarding DOE-WMPO/YMPO quality assurance audits conducted from February to July, 1988. These audits were on Fenix & Scisson, Holmes & Narver, USGS-Menlo Park, and USGS-Denver.

Fenix & Scisson, Tulsa, Oklahoma, February 23-26, 1988

Comments on the Audit Process

This audit was the first audit that the State of Nevada Nuclear Waste Project Office was allowed to observe. The audit ran very smoothly. The team seemed very well prepared and handled some tense situations with the F&S staff very well. One problem that was noted was that the technical specialist assigned to this audit did not have the necessary background related to F&S's activities to adequately evaluate the F&S technical areas audited.

Comments on the F&S QA Program

From the objective evidence observed during the audit, it was readily apparent that the F&S QA program was not being adequately or effectively implemented. There were no position descriptions for critical areas, the majority of the employee experience records were not verified, the training program was inadequate, and their procurement activities were uncontrolled. Given the nature of their work, i.e., designing the ESF, a rigorous QA program that is effectively implemented is critical to the waste

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program as a whole. Hopefully, moving the office to Las Vegas will give DOE more of an opportunity to adequately oversee the F&S program.

Holmes and Narver, Las Vegas, Nevada, March 29 - April 1, 1988

I did not observe this audit.

USGS-Menlo Park, Menlo Park, California, April 26-28, 1988

Comments on the Audit Process

This audit was disappointing. It appeared that too little time was spent preparing for the audit and definitely too little time was spent auditing. Out of the three days scheduled for the audit, only approximately 10 hours were spent performing the audit. There was little direction or guidance given by the lead auditor to make the audit an effective one. The first daily caucus for the audit team was held with a member of the USGS QA organization present, preventing any in-depth discussion on potential findings. Subsequent team caucuses did not have sufficient discussion between the auditors and the lead auditor to adequately ascertain the justification for the findings. The lead auditor refused to extend the audit when it was requested by the members of the team. This resulted in an inadequate audit that made it impossible to determine the adequacy or effectiveness of the USGS-Menlo Park QA Program.

USGS-Denver, NTS and Lakewood, Colorado, June 8-10;13-17;20-24, 1988

Comments on the Audit Process

Given the size of the audit team, this audit ran well. There was some confusion as to logistics at the start of the audit out at the test site because of the size of the audit; however, this was minor and was resolved quickly. One area of concern for the State was the use of the WMPO Audit Observer Inquiry forms. These forms were created by SAIC in an attempt to prevent to auditee from being swamped by questions from both the auditors and the observers. The problems arose from the fact that there was not uniform use of the forms by all the auditors. This lead to problems of when to use the forms and when not to.

Comments on the USGS QA Program

The USGS QA program speaks for itself, given the outcome of the audit. The attitude of the USGS staff during the audit was that "QA was a waste of time and it actually prevented them from performing a credible job". The staff, especially the technical staff, indicated a large amount of frustration in dealing with

type of QA program that DOE required and the manner in which the USGS management had implemented the program. The USGS QA staff itself indicated frustration in dealing with the requirements of the DOE program and it showed in the way that the USGS QA program was implemented. The USGS had revised its QA plan to meet Rev. 5 of NVO-196-17, but had not revised the implementing procedures that governed the activities. Some of the procedures were two revisions behind the Rev. 5. A complaint often heard from the QA staff was that DOE had given them little, if any, guidance regarding their QA program.

Given all the problems found at USGS, it makes one wonder what was done during the two years of the prior stop-work order. Obviously, USGS had not brought their QA program up to standard before the stop-work order was lifted. With the results of this audit, another stop-work order is in effect on the only work that was allowed to continue under the previous stop-work order and the only work that was being performed for the site. The effectiveness of DOE's stop-work orders is certainly now open to question.

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