

DOE QA SCP

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Mr. Ralph Stein, Associate Director  
for Systems Integration and Regulations  
Office of Civilian Radioactive  
Waste Management  
U. S. Department of Energy, RW-30  
Washington, D.C. 20545

Dear Mr. Stein:

In a meeting on July 7, 1988, U.S. Department of Energy (DOE) and U.S. Nuclear Regulatory Commission (NRC) staffs agreed to milestones and schedules for DOE development and NRC acceptance of the DOE Quality Assurance (QA) program for site characterization. Since that meeting, the schedules have been revised a number of times. The latest documented schedules were provided by DOE in the September 7, 1989 QA status meeting (Enclosure 1). The purpose of this letter is to inform you of our concern over the slow progress in the development of the QA program for the DOE Yucca Mountain Project Office (YMPO) and to recommend increased management attention to implement an appropriate QA program in that organization.

The July 7, 1988 meeting agreement contained an approach for NRC staff review of DOE QA plans and audits for each of the major organizations in the program. Since that time, many of the identified milestones for DOE contractors have been completed. All of their QA plans were submitted in the spring of this year and have been accepted in a formal Safety Evaluation. All of the contractors have had at least one DOE audit observed by the NRC staff and most have had two audits. In contrast to the progress at these organizations, DOE has not submitted the YMPO (including its contractor SAIC) QA Plan to the NRC staff for review (originally due in September 1988 and recently promised by October 1989), nor has the NRC staff observed any DOE audits of that organization. The first audit of YMPO is now scheduled for December 1989 and may slip further. As we noted in the January 25, 1989 bi-monthly status meeting on QA, we believe that a preferable approach would have been for DOE to have qualified the YMPO QA program as one of the first, since YMPO is responsible for integrating the activities of the contractors. Unfortunately, YMPO is now the last program to be processed through the NRC review and acceptance process.

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We believe the above situation, as well as completing the internal audit of OCRWM scheduled for December 1989, deserves attention by DOE. I would appreciate your informing me of the action DOE is taking in this regard. If I can provide any further information, please call me on (301) 492-3387.

Sincerely,

**ORIGINAL SIGNED BY**

John J. Linehan, Director  
Repository Licensing and Quality  
Assurance Project Directorate  
Division of High-Level Waste Management

Enclosure: As stated

- cc: R. Loux, State of Nevada
- C. Gertz, DOE/NV
- S. Bradhurst, Nye County
- M. Baughman, Lincoln County
- D. Bechtel, Clark County
- K. Turner, GAO

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AS OF SEPT. 7, 1989

ENCLOSURE 1

# STATUS OF DOE QA PROGRAM IMPLEMENTATION

QA PROGRAM PLAN					QUALIFIED QA PROGRAM		
ORGANIZATION	DOE SUBMITS	NRC COMMENTS	DOE REVISES	NRC ACCEPTS	QUALIFICATION AUDITS	DOE ACCEPTS <sup>4</sup>	NRC ACCEPTS
OCRWM <sup>2</sup>	AUG. 26, 1988 SEP. 16, 1988	SEP. 28, 1988 NOV. 3, 1988	NOV. 29, 1988 DEC. 21, 1988	MAY 8, 1989 MAY 2, 1989	DEC. 1989 (TENTATIVE)	JAN. 1989	NO
YMP	AUG. 15, 1988	OCT. 14, 1988	DEC. 13, 1988	DEC. 30, 1988	NA	NA	NA
YMPO	OCT. 1989	NO	NO <sup>3</sup>	NO	DEC. 1989 (TENTATIVE)	JAN. 1989	NO
F&S	FEB. 21, 1989	MAR. 22, 1989	AUG. 11, 1989	NO	APR 10-14, '89 COMPLETE	SEP. 29, 1989	NO
H&N	MAR. 3, 1989	APR. 26, 1989	AUG. 11, 1989	NO	APR 24-26, '89 COMPLETE	SEP. 29, 1989	NO
SNL	APR. 14, 1989	JUN. 26, 1989	SEP. 7, 1989	NO	SEP. 11, 1989	OCT. 23, 1989	NO
USGS	APR. 14, 1989	JUN. 20, 1989	SEP. 7, 1989	NO	AUG. 14, 1989 COMPLETE	OCT. 13, 1989	NO
REECo	FEB. 21, 1989	MAY 5, 1989	AUG. 11, 1989	NO	SEP. 25, 1989	NOV. 6, 1989	NO
LLNL	MAR. 3, 1989	JUN. 19, 1989	SEP. 7, 1989	NO	JUN 5-9, 1989 COMPLETE	SEP. 29, 1989	NO
LANL	MAR. 15, 1989	JUL. 19, 1989	SEP. 29, 1989	NO	OCT. 16, 1989	NOV. 27, 1989	NO

- 1) OARD                      2) QAPD                      3) 4 WEEKS AFTER RECEIPT OF NRC COMMENTS  
 4) BASED ON RECEIPT OF NRC OBSERVATIONS WITHIN 30 DAYS AFTER AUDIT