



Department of Energy

Washington, DC 20585

DEC 22 1989

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

Dear Mr. Linehan:

Enclosed are the U.S. Department of Energy (DOE) responses to observations made by the U.S. Nuclear Regulatory Commission (NRC) during Quality Assurance Audit 89-2 of Holmes & Narver (H&N). Please note that DOE did not respond to observations d, e, and f, because your July 31, 1989, letter transmitting NRC's observations stated that responses to these observations were not necessary.

If you have any concerns regarding these responses, please contact me at 586-1462.

Sincerely,

Gordon Appel, Chief
Licensing Branch
Office of Civilian Radioactive
Waste Management

Enclosure:

- 1) Yucca Mountain Project Office Response to NRC Staff Observations Contained In NRC Observation Report for QA Audit 89-2

cc. R. Loux, State of Nevada
M. Baughman, Lincoln County, NV
S. Bradhurst, Nye County, NV
D. Bechtel, Clark County, NV

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**YUCCA MOUNTAIN PROJECT OFFICE RESPONSE TO NRC STAFF OBSERVATIONS CONTAINED IN
NRC OBSERVATION REPORT FOR QA AUDIT NO. 89-2**

Observation (a):

Consideration should be given to revising the control in the 88-9 QA Plan which allows design verification to take place just prior to relying on a component, system or structure to perform its function. (See Section 4.4) (Level 4). DOE should provide a formal response to this observation.

Response:

NWSSI/88-9, Rev. 2 (88-9 QA Plan) incorporates the requirements of NQA-1, 1986, that the NRC Standard Review Plan, Rev. 2, March 1989, endorses. The requirements for design verification currently in the 88-9 QA Plan are a reflection of NQA-1, 1986. As NQA-1, 1986, is recognized as an acceptable national consensus standard by the NRC, no change is contemplated or planned. We believe that this requirement does not represent a risk to public safety because design verification is required prior to relying on the item to perform its intended function.

Observation (b):

YMPO and H&N should continue to take the necessary precautions to preclude engaging in Title II activities, involving software, without an approved software program. (See Section 4.4) (Level 4). DOE should provide a formal response to this observation.

Response:

The Project Office is working with H&N to develop an adequate Software Quality Assurance Program. The implementation of a Software Quality Assurance Plan will be addressed in future audits. QA Level I and II activities that require software are precluded pending an approved SQAP.

Observation (c):

The released SDRD, Revision 0 does not contain the changes to resolve the numerous comments identified by the program participants. These comments should be resolved and appropriately incorporated into the next SDRD revision and participants' design base documents and Title II designs. The NRC will continue to monitor this process. (See Section 4.3) (Level 4). DOE should provide a formal response to this observation.

Response:

The SDRD, Revision 1, is currently undergoing verification. This revision is tentatively scheduled to be presented to the Change Control Board on November 8, 1989, for further processing. The unverified revision (Benchmark 6) does have the changes to resolve the comments by the program participants. When approved, Revision 1 will be incorporated into the participants' design base documents and Title II designs.

Observation (g):

The NRC staff encourages YMPO and H&N to take the necessary action to assure proper interface and coordination between all program participants, especially the interface with NTSO. (See Section 4.4) (Level 4). DOE should provide a formal response to this observation.

Response:

The Project Office agrees with the comment. YMPO Administrative Procedure AP-5.19Q, Rev. 0, Interface Control, became effective on June 15, 1989. This administrative procedure addresses the interfaces and coordination between all program participants.

Observation (h):

Due to the Privacy Act issue, auditors and the NRC staff are unable to obtain and review program participants' qualification records to determine which individuals are sufficiently qualified to perform their respective quality affecting activity. This issue needs to be resolved. (See Section 4.4) (Level 4). DOE should provide a formal response to this observation.

Response:

The Department of Energy is pursuing the legal steps necessary to resolve the Privacy Act issues.

Observation (i):

During the conduct of the audit, it was observed that several of the audit checklist criteria were classified as "not applicable" due to ongoing work not being conducted in a particular area. The NRC staff commented that when work is not being conducted in an area, a random sample of the implementing procedures should be audited to assure such procedures are checked for adequacy and in accordance with the respective commitments and applicable requirements. (Level 4) DOE should provide a formal response to this observation.

Response:

The Project Office agrees with the comment. Auditors will be instructed to review a sampling of procedures to assure the procedures are in accordance with applicable requirements when work is not being conducted.

Observation (j):

At the exit meeting, there was no explanation of the audit findings. Only the total number of potential SDRs and observations were presented. Even though daily briefings were held with H&N management and certain audit observers, all of the interested individuals did not obtain a clear picture of the consistency of the potential findings. As with all previous audits, the NRC staff recommends that all findings even though preliminary, should be described and presented to all interested parties at the exit meeting. (Level 4). DOE should provide a formal response to this observation.

Response:

The Project Office agrees with the observation. The auditor did not present the results correctly at the exit meeting. Preliminary findings and results will be clearly presented at all future exit meetings.

Observation on page 8:

Also, during the auditing of nondestructive testing (NDT) personnel, an NRC inquiry was issued by the NRC staff requesting the extent documented evidence is available to demonstrate that NDT personnel meet the education, training and experience requirements within the qualification levels of SNT-TC-1A and whether log sheets of experience hours are maintained on NDT personnel. H&N stated there was not sufficient documentation to support certification to SNT-TC-1A and the experience hours are maintained, but are not easily correlated to specific techniques. This resulted in an audit team observation. Since H&N had not performed any NDT work, this issue was not classified as a Standard Deficiency Report (SDR). Even though audits are an evaluation of selected areas, the NRC staff believes a more thorough audit of this area could have been conducted. (Level 3)

Response:

The Project Office does not agree with this observation. As stated, this was issued as an observation, since the actual NDT that will be needed will not occur for some time. Additionally, the auditor provided the NRC representative with additional information (See Audit Observer Inquiry #11, attached) to clarify his concerns. The Project Office disagrees that additional auditing needed to be performed at this stage of the project.

YUCCA MOUNTAIN PROJECT
AUDIT OBSERVER INQUIRY

N-QA-084
4/89

Audit No. HIN 8902

Log No. 11

Name R. D. BRIENT - NRC Organization NRC

YMP Requirement Reference NNNSI OAD-99-4, Rev 2 Oct 9, Para. 2.4.1 & 2.4.3

Question/Concern Is evidence of education and experience available to support NDE personnel certificant qualification levels in accordance with SNT-TC-1A and HIN procedure NNNSI-022 para 4.2.4?

Are HIN NDT Log Sheets maintained documenting NDT experience hours? (NNNSI 022 6.2.2)

Response No ^{JOB 4/27/89} statement No HIN personnel are currently certified to HIN NNNSI 022 (SNT-TC-1A 1980) requirements. Documentation available does not contain sufficient documentation to support certification to SNT-TC-1A 1980.

Experience hours are maintained but are not easily correlated to a specific technique.

[Signature]

Observer's Acknowledgement

Cleared for Submittal to YMP Participant

Lead Auditor / Lead Technical Specialist

Incorporated in YMP Audit Checklist...Ref

Audit Team Leader