



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 89-1 of Fenix and Scisson of Nevada (F&S). Please note that DOE did not respond to observation number 1, because your July 31, 1989, letter transmitting NRC's observations stated that a response to this observation was 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 Conclusions Contained In NRC Observation Report for QA Audit 89-1

cc: R. Loux, State of Nevada
C. Johnson, State of Nevada
M. Baughman, Lincoln County, NV
S. Bradhurst, Nye County, NV
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YUCCA MOUNTAIN PROJECT OFFICE RESPONSE TO NRC STAFF CONCLUSIONS CONTAINED IN NRC OBSERVATION REPORT FOR QA AUDIT 89-1

Observation 2:

Consideration should be given to revising the requirement 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. (Section 4.5) (Level 4)

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 3:

YMPO and F&S should continue to take the necessary precautions to preclude engaging in Title II activities without an approved software program. DOE should provide a formal response to this observation. (Section 4.5) (Level 4)

Response:

The Project Office is working with F&S (FSN) to develop an adequate Software Quality Assurance Program. As of October 4, 1989, a revised Software Quality Assurance Plan (SQAP) had conditional Project approval. Quality Assurance Level I and II activities that require software are precluded pending removal of the condition on the SQAP.