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Mr. Ralph Stein, Acting Associate Director
Office of Systems Integration and Regulations
Office of Civilian Radioactive
Waste Management
U. S. Department of Energy RW-24
Washington, DC 20545

Dear Mr. Stein:

The purpose of this letter is to transmit, for your information, an observation audit report by members of the Nuclear Regulatory Commission staff on a recently conducted DOE/WMPO audit of the U.S. Geological Survey (USGS). As a result of this DOE/WMPO team audit, the staff has concluded that the effectiveness and completeness of the audit were insufficient to ensure that the USGS QA Program is being properly implemented. At present, the staff does not have the confidence needed to assure that the DOE/WMPO audit accomplished the degree of understanding needed to ensure that all applicable quality assurance (QA) requirements are being implemented by the USGS. This finding is based on the staff observations during the audit. A detailed discussion of our concerns is given in the enclosed report.

As a result of its observation of the audit, the staff believes that DOE/WMPO should evaluate the process of this audit in order to determine how, in the future, more effective and complete audits can be performed. Based on its findings, the staff believes that a more comprehensive audit appears necessary to ensure that the USGS implements the actions needed to meet the requirements for an effective QA program.

Finally, in order for the staff to determine if the USGS QA program meets the applicable regulatory requirements, the USGS plan needs to be formally submitted by DOE to the staff. Also, future NRC audits and/or observation audits will be necessary to ensure adequate implementation. If you have any questions, please call the team leader for the NRC observation team, Mr. Joe Holonich on FTS 492-3403.

Sincerely,

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B. J. Youngblood, Chief
Operations Branch
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

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Enclosure: As stated

cc: C. Gertz (WMPO)
R. Loux (State of NV)
Stan Klein (SAIC)
Susan Zimmerman (State of NV)

SEE PREVIOUS CONCURRENCES

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