

memorandum

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SUBJECT: Participation of OGR Representative in WMPO QA Audit of Sandia,
June 1-5, 1987

TO:
Jim Blaylock, WMPO

Attached is the report of participation in the recent WMPO audit of Sandia which was prepared by the OGR representative on the audit. Thank you for the opportunity to participate.

Carl Newton

Carl Newton, Quality Assurance Manager
Office of Geologic Repositories

Attachment:

cc w/att: Henry Caldwell, SAIC

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Report of Participation by
Robert W. Clark in WMPO
Audit of Sandia National
Laboratories, June 1-5, 1987

Auditing Organization: Waste Management Project Office (WMPO)

Audited Organization: Sandia National Laboratories (SNL), Albuquerque,
New Mexico

Audit Number: WMPO Audit 87-5

Dates of Audit: June 1-5, 1987

Audit Scope: This audit was performed to evaluate the effectiveness of the Sandia National Laboratories Quality Assurance Program Plan (QAPP) with respect to the requirements of NNWSI NVO-196-17, Revision 4, and to verify the implementation of the Quality Assurance Program as it relates to the NNWSI Project.

Audit Team:

Henry H. Caldwell	SAIC, Audit Team Leader
Robert H. Klemens	SAIC, Auditor
Gerard Heaney	SAIC, Auditor
James M. Gromer	SAIC, Auditor
Forrest D. Peters	SAIC, Auditor
Theodore Vetter	SAIC, Auditor
Robert W. Clark	HQ/OGR-WESTON, Auditor
George D. Dymmel	SAIC, Technical Specialist
William R. Sublette	SAIC, Technical Specialist
U Sun Park	SAIC, Technical Specialist
Paul T. Prestholt	NRC/NV, Observer

Summary of Audit: The activities audited included all 18 elements of the QA Program, as well as, the technical activities of the following WBS elements:

Technical Data Base (WBS 1.2.1.3)
Total Systems Performance Assessment (WBS 1.2.1.4)
Site Geology (WBS 1.2.3.2.1.1)
Rock Mechanics (WBS 1.2.4.2.1.1)
Field Test (WBS 1.2.4.2.1.2)
Lab Properties (WBS 1.2.4.2.1.3)
Facilities (WBS 1.2.4.3)
Test Facilities (WBS 1.2.7)

As a participating Audit Team member, I was responsible for the following QA programmatic elements:

- 1 Organization
- 2 QA Program
- 17 QA Records

I discovered one discrepancy (formally called finding) and two observations in my areas of responsibility. The discrepancy was in the area of "QA Records" (lack of compliance of QA Plan requirements in generating training records). One observation was in the area of "Organization" (SNL QAPP Sect. 1 and the Organization Chart need to be revised to more fully comply with the requirements of SOP-02-01). The second observation was in the area of "Indoctrination and Training" (Indoctrination and Training Form needs to be revised to indicate the revision levels of the applicable procedures that personnel are trained to).

Prior to conducting audit activities a pre-audit conference was held for the purposes of introducing the Audit Team to SNL management and staff and discussing the areas to be audited. At the conclusion of the audit a post-audit conference was held for the purpose of discussing the results with SNL representatives and notifying them of "preliminary" deficiencies and observations found during the conduct of the audit. The word "preliminary" is used in that WMPO reserves the right to revise deficiencies and observations based on management review prior to issuing a formal report.

As a result of this audit nine (9) deficiencies, documented on WMPO Standard Deficiency Reports (SDRs), were written. Note that at this time they are preliminary.

These deficiencies are summarized as follows:

- 1) SNL has no written procedures covering "Changes to Procurement Documents."
- 2) WBS 1.2.4.3 QALS approved at Level II. Task No. 1.2 approved under DIM 102, 2/19/87, "Emplacement Orientation" was designated as QALS Level III.
- 3) Two SNL Department Operating Procedures, DOP 3-6 and DOP 3-9, do not conform to the requirements of SOP-03-05 in that they do not address the processing and approvals within Sandia of ESF Engineering Change Requests.
- 4) SNL does not have a procedure covering the evaluation for acceptance of purchased items and services.
- 5) SNL does not have a procedure covering the requirements for certification, qualification and training of auditors and lead auditors.

- 6) Review of QA documents (Training Records) revealed that a number of entries were made in pencil and multi-colored ink.
- 7) SNL does not have approved procedures for surveillances, nonconformance and corrective action.
- 8) The calibration lab at Sandia does not utilize calibration procedures that are reviewed or approved in accordance with NNWSI NVO-196-17 Rev. 4.
- 9) During the period 1980-1986, technical procedures used, governing certain test activities, were not reviewed and approved in accordance with WMPO Quality Assurance Program.

It should be noted that, although, a number of these discrepancies are in the area of "Lack of procedure", it has only been approximately six (6) months since the lifting of the Stop Work Order and the issuance of the current WMPO approved SNL QA Program Plan. Some of these procedures are in the draft stage and upon issuance should satisfy the discrepancy.

It is also expected that ten (10) observations will be issued as a result of this audit.

Evaluation of Conduct of the Audit:

Under the direction of Team Leader, Henry Caldwell, the audit was conducted in a professional, organized and knowledgeable manner. At the end of each day the team leader met with the team for the purpose of exchanging information and monitoring the progress of the audit. He also met daily with the SNL Technical Project Officer or the Quality Assurance Coordinator to inform them of the preliminary discrepancies/observations that were being discovered.

The SNL Organization was also very cooperative and responsive to the questions/concerns of the audit team.

While the outcome of the audit resulted in an effective evaluation of the SNL QA Program, I believe that there are two areas that could be improved:

The first of these areas is in reference to the checklists that were used. WMPO utilized "generic" checklists with questions based on the requirements of NNWSI NVO-196-17 and applicable SOPs. It has already been determined that the SNL QA Plan complies with the NVO-196-17 by virtue of WMPO approval of it. There are many ways to word compliance with a requirements document, and I believe time could have more efficiently been utilized if I didn't have to interpret SNL compliance with the checklist questions before I could evaluate adequate implementation. Utilizing a checklist made up of questions directly from SNL's QA Plan would more accurately assess the effectiveness of the implementation of this plan.

The second area is in reference to the scope of this particular audit, in that, it was an audit of the entire QA Program and eight (8) technical activities. SNL requires very high security measures, therefore, the audit team was required to be escorted at all times. This proved to be cumbersome at times and resulted in some periods of waiting for available personnel to assist us. While I credit SNL personnel for helping, as best they could, in this matter, I feel that future audits of SNL should be of limited scope in order to perform a most in-depth evaluation as is possible during the time available.

Prepared by R.W. Clark
Robert W. Clark

Date 6-12-87

RECORD OF CORRESPONDENCE CONCURRENCE AND DISTRIBUTION

SUBJECT: Report of Participation in WMPO Audit of Sandia,
June 1987

FROM: C. Newton, RW-24

TO: J. Blaylock, WMPO

PC CODE: CN144 (MARIE ADAMS' IBM)

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C. Newton, RW-24

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