

United States Government

Department of Energy

# memorandum

WM DOCKET CONTROL CENTER

WM Record File

WM Project

Docket No. \_\_\_\_\_

PDR

LPDR

Distribution:

Kennedy

LENEHAN

Delligatti

STABLEIN

(Return to WMI, 623-SS)

23

WM-11

DATE: DEC 24 1985

'86 JAN -3 P3:19

'86 JAN -7 P1:48

REPLY TO  
ATTN OF: RW-24

SUBJECT: Evaluation of Revised Responses to Audit 85-N-1

TO: Don Vieth, WMPO

We have reviewed the revised audit responses that were contained in your memo of October 18, 1985. We find your responses to findings number 2, 3, and 4 to be satisfactory. We will, of course, need to verify in a future audit that the corrective actions you have proposed are in fact accomplished and will at that time close these findings.

Your response to finding number 1 does not actually close out the issue. It is the DOE-HQ position that the project manager must have authority to stop work for all contractors and participating organizations doing work important to safety or waste isolation. We base this position on section 1.12(d) of Appendix A of the NRC Review Plan.

Please provide a revised response to finding number 1 within 30 days of receipt of this memo. Your revised response should include the following:

- (1) The actions to be taken by WMPO, and the schedule for these actions, to effect an agreement between the project manager and the Contracting Officer (CO) for REECO, H&N, and F&S that will assure that the CO will issue a stop work order to these organizations when so requested by the project manager.
- (2) A commitment to provide a written response to OGR by January 31, 1986, summarizing the status of interactions with USGS to establish an agreement with WMPO giving the project manager stop work authority. In the event this matter is not complete by this time, please propose the additional actions you intend to take, or that you request other parts of the OGR organization to take.
- (3) A commitment to provide a written response to OGR by January 31, 1986 summarizing the status of interactions between WMPO and the DOE-SAN Office regarding the authority of the project manager to stop work on SAN contractors. Also, please propose any additional needed actions if this matter is not resolved by January 31, 1986.

8601240086 851224  
PDR WASTE  
WM-11

PDR

834

I commend you for your successful efforts in gaining stop work authority over ALO contractors through the Management Agreement you negotiated. I cannot overemphasize the importance in extending this authority to the SAN contractors, USGS, and the NTS Support Contractors. Unless you are able to establish and document this authority, your program will not be in compliance with regulatory requirements and this could result in a need to terminate their services or reduce their scope of work to non-safety related activities.

*Tom Daacs*

*WJ* William J. Purcell  
Associate Director for  
Geologic Repositories  
Office of Civilian Radioactive  
Waste Management

cc: C. Head, RW-23  
M.E. Langston, RW-43  
Hal Steinberg, RW-33  
Ed Sulek, Weston  
Jim Kennedy, NRC