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William J. Purcell, Associate Director, Office of Geologic Repositories
DOE/HQ (RW-20) FORSTL

DOE/HQ OFFICE OF GEOLOGIC REPOSITORIES (OGR) AUDIT 85-N-1 OF WASTE MANAGEMENT
PROJECT OFFICE (WMPO) QUALITY ASSURANCE PROGRAM

During the March 5-7, 1985, HQ-OGR audit of WMPO, the audit team members identified four findings and five observations. The enclosure addresses the proposed audit responses by WMPO to the findings and observations. Two of the proposed responses involve actions by other Operations Offices. Audit Finding #1 in part involves the WMPO management controls exercised over the National Laboratories; Audit Finding #4 involves the lead auditor qualifications of an audit team leader from the Albuquerque Operations Office. WMPO has been unable to attain closure of these audit findings. If the additional proposed steps are not successful in resolving the findings, these issues will be escalated to the Office of Civilian Radioactive Waste Management (OCRWM) for further consideration.

For those proposed responses requiring changes to the NNWSI Project QA Plan or the WMPO QAPP, modifications to those documents will be made during the semi-annual review and update. WMPO anticipates these changes will be completed by August 1985 unless otherwise noted.

If you have any questions, please call James Blaylock on FTS 575-1125.

Original: 11
Date: 5/1/85

Donald L. Vieth, Director
Waste Management Project Office

WMPO:JB-962

Enclosure:
As stated

cc w/encl:
D. C. Newton, DOE/HQ (RW-23) FORSTL
E. W. Sulek, Weston, Rockville, MD
R. W. Gray, MED, DOE/NV
S. H. Klein, SAIC, Las Vegas, NV
M. B. Blanchard, WMPO, DOE/NV
V. F. Witherill, WMPO, DOE/NV
V. J. Cassella, DOE/HQ (RW-22) FORSTL

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Audit Finding #1

Finding

Management controls have been established but are not fully documented between the project and the following participating organizations.

- a. National Laboratories (SNL, LANL, and LLNL)
- b. USGS
- c. NTSO contractors (H&N and REECO)

Response

1. The Director, WMPO, has been designated to act as the Contracting Officer's Technical Representative (COTR) for NNWSI Project activities with responsibilities as defined in accordance with the provisions of DEAR 901.603-73 for USGS (effective April 15, 1985) and the State of Nevada (effective April 23, 1985). In addition, the Director, WMPO, has been delegated Contracts Administrator Representative Authority for NNWSI Project activities conducted by H&N and REECO (effective April 12, 1985). With respect to USGS, a Memorandum of Understanding exists between DOE/NV and USGS that covers the work USGS does for the NNWSI Project. Revision of that MOU was proposed beginning in July of 1984. Action on the proposed revision has been held in abeyance during the period October 1984 to present while the USGS reconsidered the role it wanted to play in the NNWSI Project. As soon as this question is settled, further negotiations will resume to more clearly define WMPO QA authority and control over the USGS effort on the NNWSI Project.

2. WMPO is attempting to resolve the issue of management controls on the National Laboratories through inter-Operations Office channels, and by using the Project Charter as specified in DOE Order 5700. Currently the contracts for two National Laboratories involved, Sandia National Laboratory and Los Alamos National Laboratory, are managed by Albuquerque Operations Office and the remaining National Laboratory contract, Lawrence Livermore National Laboratory, is managed by the San Francisco Operations Office. WMPO has requested, through the NV Assistant Manager for Administration, that Contracting Officer Technical Representative authority be defined and delegated to the Director, WMPO.

Since the contracts the Department has with the University of California for the operation of Los Alamos National Laboratory and Livermore National Laboratory and with Western Electric for the operation of Sandia National Laboratory are different than the standard contracts with contractors, the use of a Contracting Officer's Technical Representative may not be appropriate. Alternative mechanisms for establishing management control over the laboratories are being investigated by WMPO and the Manager of NV. These alternatives may require OCRWM involvement and action. It is expected that three to four additional months will be required to propose and evaluate these alternative means. One approach is to give WMPO direct control over the distribution of funds with appropriate technical guidance.

To fully formalize the recognition by the other Operations Offices that they are intimately involved in this program, WMPO has proposed that the revised Project Charter now under development clearly define the roles and responsibilities assigned to these operations offices and obtain each of the Operations Office Manager's review and concurrence on the Project Charter. The revised Project Charter is still in preparation and cannot be finalized until the question of management authority is clarified.

Audit Finding #2

Finding

1. Contrary to the requirements, WMPO has not established a Records Management System. The Director, WMPO, was fully aware of this situation before this audit and in a December 13, 1984, memo to Ralph Stein advised EQ that a procedure is being developed and will be issued after completion of a study by Effective Solutions, Inc. (ESI).
2. Procedures for the control of computer programs have not been finalized and issued. The WMPO has drafted SOP-02-02 to establish program controls of computer programs in accordance with the guidance in NUREG-0856.

Response

1. A draft NNWSI Project QA records management specification has been developed by ESI. The WMPO has evaluated the specification and is in agreement with the concept. Also, the WMPO is in the process of expanding the ESI contract and developing a WMPO position description for a NNWSI Project Records Administrator (called for in the specification) to complete the development of an NNWSI-SOP and provide for its implementation. The procedure is expected to be issued in August 1985.
2. A committee has been assembled and charged with the responsibility of developing a new draft of SOP-02-02. The draft procedure is expected to be sent to WMPO for review and approval by July 1985. At the present time, there are no computer programs being utilized that fall into the NNWSI Project Quality Level I classification to which this procedure should be applied.

Audit Finding #3

Finding

1. The QA Program Plan does not adequately describe provisions for the resolution of disputes involving quality.
2. Although the PQM position has been established in WMPO, the responsibilities of the PQM are not defined in Section 4 of QMP-01-01.

Response

1. If disputes in QA arise between the PQM and the Director, WMPO, the PQM has a clearly defined independent reporting channel to the Director, QAD. Within the NV organizational structure, if QA issues cannot be resolved at a

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lower level, - NV Order 5700.6A provides the Director, QAD, with access to the Assistant Manager for Engineering and Safety and the Manager, NV for the resolution of such issues.

2. QMP-01-01, Section 4.7.4, will be revised to reflect the responsibilities of the PQM which are now identified in the NNWSI Project QAP NVO-196-17, Section 1.6, and the WMPO QAPP NOV-196-18, Section 1.0. The responsibilities of the PQM presently identified in the QAP and QAPP which will also be included in the QMP are as follows: coordination of QASC activities; development, implementation, and maintenance of the NNWSI Project QAP, WMPO QAPP, and implementing procedures for each; conducting audits and surveillances; and reviewing NNWSI Project participant documents.

Audit Finding #4

Finding

The audit team leader on the LANL audit and the SNL audit conducted by the Albuquerque Field Office was not certified to the requirements of NQA-1.

Response

The current policy of the other Operations Offices that manage the contracts for the National Laboratories is that QA audits of their contractors will be led by an auditor from their office. WMPO recognizes that these lead auditors are neither certified to the requirements of NQA-1 nor familiar with the objectives or details of the technical work conducted by the National Laboratories in support of the NNWSI Project. WMPO's initial position was that one of our auditors on the audit team would be the lead auditor; however, we were unable to maintain this position. The compromise that was established to accommodate the other Operations Office's policy and allow the audits to proceed was to accept their man as lead auditor and he would work to the check list that was established by WMPO.

The current situation is a result of an Operations Office policy position. The approach that we plan to use to change this previous unchangeable position is to use the revised Project Charter that the other Operations Office Managers will sign. This should provide the vehicle with appropriate OCRWM and Department management support necessary to change a policy position. We will need support from OCRWM to encourage the Operations Offices involved to accept a different policy position that will be reflected in the revised Project Charter.

Observation #1

Observation

Copies of the five OCR baseline documents released by HQ to date were not all readily available in either of the WMPO Branch Chief offices and the Branch Chiefs did not seem familiar with the documents. The program does not describe interface controls to ensure that the requirements in these documents had been passed on (as requirements) to participants.

Response

The interface responsibilities for passing OCRWM policy, program, and project guidance on to the NNWSI Project participants is covered in the NNWSI Project Administrative Procedure, AP 3.1. The AP was issued on January 15, 1985, but was not fully implemented at the time of the audit, particularly due to WMPO personnel not yet being trained regarding their specific responsibilities.

Also, WMPO is preparing a letter to OCRWM to indicate which WMPO personnel are to receive controlled copies of OCRWM baseline documents. As a minimum, the list will contain the Director, WMPO; Assistant Director; Branch Chiefs; and the PQM.

Observation #2Observation

1. Initial proficiency evaluations as required by QMP-02-01 for WMPO personnel are not in the QA files.
2. The training records reviewed do not adequately describe the scope of the training that was conducted.

Response

1. The initial proficiency evaluations for WMPO personnel will be completed by May 31, 1985.
2. The individual training records have been revised to show the detailed scope of training presented.

Observation #3Observation

WMPO does not, to a reasonable representative degree, perform audits of representative subcontractors, consultants, or vendors as required.

Response

It is the interpretation of WMPO of the NRC Review Plan, Appendix A, paragraph 18.1 that the statement, "DOE should perform audits of the prime contractor and representative subcontractors, consultants, vendors, and laboratories to assess the effectiveness of the prime contractor's audit program." is based on the DOE field office using an integrating contractor (prime contractor). Since the NNWSI Project organization does not use an integrating contractor (the WMPO acts as one) but is comprised of NNWSI Project participants (major subcontractors), WMPO feels that this requirement does not apply.

The WMPO meets the NRC intent by conducting yearly programmatic audits of all NNWSI Project Participating Organizations and NTS Support Contractors and by participating in selected audits conducted by the NNWSI Project participants on their subcontractors.

Observation #4

Observation

The WMPO QA Plan does not describe how the yearly management assessment of the scope, status, adequacy, and compliance of the QA program is performed by persons or organizations above or outside the QA organization.

Response

The WMPO QAPP will be revised to describe how the yearly management assessment will be conducted. At the present time, the NNWSI Project approach will be that the QAD perform the assessment for the Director, WMPO. The choice of the QAD to perform the assessment is two-fold: (1) the QAD is independent of the WMPO QA organization, and (2) the QAD has the frequent contact with the OCRWM program QA requirements to effectively assess the NNWSI Project QA Plan for compliance.

Observation #5

Observation

Performance of internal audits have been scheduled but have not commenced. The program is not clear, as evidenced by interviews, as to whether surveillances of internal activities will be performed.

Response

1. The observation on WMPO internal audits is correct. The audit team reviewed the WMPO Audit Schedule which identified five internal audits of WMPO activities, the first of which took place on April 11-12, 1985.
2. The activity conducted by WMPO on the NNWSI Project is primarily a project management function. WMPO has delegated the technical responsibilities of the NNWSI Project to the various NNWSI Project participants. With this in mind, the WMPO evaluated the need and concluded that the WMPO QAPP would exclude the need for internal surveillances (definition: the act of monitoring or observing to verify whether or not an item or activity conforms to specific requirements).

It should be noted that the program does provide for internal audits to be conducted, and surveillances and audits of the Project participants' responsibilities will be conducted. It should also be noted that the QAD/NV performs audits and surveillances on WMPO activities, and that OCRWM performs audits of WMPO.

In response to the requirement stated in the report, "NRC QA Review Plan, Appendix A, Paragraph 1.1, states in part, "...while the line organization is responsible for performing quality affecting activities properly, the QA organization shall verify the performance of work through implementation of appropriate QA Controls". It should be noted that the WMFO QAPP has provided for the development of quality management procedures to implement the various QA controls. Each of the QMPs not only addresses the responsibilities of the WMFO technical staff but also integrates the WMFO QA staff responsibilities.

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DOE/NV

WMPO 575-1125

TO: S. BILHORN WASTE MANAGEMENT DIV

TO: 427-4298

TO: _____

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James Blaylock
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