

FEB 27 1990

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

Dear Mr. Stein:

SUBJECT: OBSERVATION AUDIT OF LOS ALAMOS NATIONAL LABORATORY

From November 13 through 17, 1989, members of the U. S. Nuclear Regulatory Commission (NRC) staff participated as observers on the U. S. Department of Energy (DOE)/Yucca Mountain Project Office (YMPO) Quality Assurance (QA) Audit No. 89-7 of Los Alamos National Laboratory (LANL) conducted at Los Alamos, New Mexico. The NRC staff evaluated the DOE/YMPO QA audit to gain confidence that DOE and LANL are properly implementing the requirements of their QA programs. The NRC staff based its evaluation of the audit process and the LANL QA program on direct observations of the auditors, discussions with the audit team, and reviews of the pertinent audit information (e.g., audit plan, checklists, and LANL documents). This letter transmits NRC Observation Audit Report No. 90-1 for the DOE/YMPO QA audit of LANL.

The NRC staff has determined that, overall, DOE/YMPO Audit No. 89-7 of LANL was effective. The programmatic portion of the audit was generally effective, but some of the technical portions of the audit were ineffective. Integration of the technical and programmatic portions of the audit was not as effective as in some recent DOE/YMPO audits.

In general, the NRC staff agrees with the preliminary DOE/YMPO audit team findings that the LANL QA program is inadequate in the areas of procedures, training, technical reviews, and audits and surveillances. The audit team identified approximately twenty potential deficiencies in the LANL QA program, of which twelve remained unresolved by the time of the exit meeting on November 17, 1989. Some of these deficiencies were further examples of deficiencies previously identified and thought to be corrected, which raises questions about the effectiveness of both the LANL corrective action program and the DOE surveillance program.

The extent and type of the deficiencies identified, and the persistent problems in the LANL QA program, are of concern to the NRC staff. DOE must closely monitor the LANL program to ensure that future implementation is carried out in an acceptable manner. The NRC staff expects to participate in this monitoring as observers and may perform its own independent audits at a later date to assess the adequacy and effectiveness of the LANL QA program. To assist the NRC in its continuing review, the DOE should furnish the NRC staff with its schedule for audits and surveillances of LANL activities in the next twelve months.

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The potential deficiencies in the areas of adequacy of position descriptions and the lack of trend analyses are similar to deficiencies identified in several other contractor programs during calendar year (CY) 1989, and may be generic deficiencies throughout the contractor programs. The NRC staff recommends that DOE/YMPO evaluate the results of the CY 1989 audits for generic deficiencies, repeated failures of corrective action programs, and adverse program trends.

If you have any questions, please call Mark Delligatti on (301) 492-0430.

Sincerely,

/s/
John J. Linehan, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management

Enclosure: As stated

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