



# Department of Energy

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JUL 06 1987

James P. Knight, Director, Licensing & Regulatory Division, HQ (RW-24)  
FORS

## COMMENTS FROM LOS ALAMOS NATIONAL LABORATORY (LOS ALAMOS) PURSUANT TO THE QUALITY ASSURANCE (QA) AUDIT

Enclosed for your information are some points raised by the Los Alamos staff pursuant to the U.S. Nuclear Regulatory Commission (NRC) QA audit. The audit was a valuable learning experience and provided the NRC staff with an opportunity to observe the QA program as practiced in support of the mineralogy/petrology investigations at Los Alamos. The audit also identified concerns associated with NRC expectations and definitions that need to be pursued if we are to have an NRC qualified QA program in the near future. Our approach to resolving these concerns is not fully developed, but attention is being given to it.

We look forward to further discussions on these issues.

*Donald L. Vieth*  
Donald L. Vieth, Director  
Waste Management Project Office

WMPO:DLV-2203

Enclosure:  
Ltr 6/18/87, Donald T. Oakley,  
Los Alamos to Donald L. Vieth, NV

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# Los Alamos

Los Alamos National Laboratory  
Los Alamos, New Mexico 87545

June 18, 1987

Dr. Donald L. Vieth, Director  
Waste Management Project Office  
US Department of Energy  
P. O. Box 14100  
Las Vegas, NV 89114-4100

Dear Dr. Vieth:

SUBJECT: OBSERVATIONS ON THE LOS ALAMOS NRC QA MINI-AUDIT, JUNE 8-12, 1987

This letter is to share with you a few observations resulting from last week's mini-audit by NRC staff. Overall, it is our view that the audit was an excellent learning opportunity for all participants.

Here are a few items for your consideration:

## o Definition of Terms

The term, "qualified QA program," was used by Jim Kennedy. This term comes directly from a Purcell-Browning letter of September 3, 1985, in which it was stated that the DOE would have a fully qualified QA program in place before the SCP submittal. As you know, the SCP is nearly complete, and no one seems to know what "qualified" means within the context of the DOE's QA activities. I urge you to move toward a quick resolution of this term, as the continued ambiguity can be misinterpreted by critics of the Project.

The meaning of review of "technical adequacy" was never defined before the audit. The impression left here is that the review of "technical adequacy" did not occur, although the NRC technical staff did leave with a good impression of the overall technical program. It is important for Project participants to understand the definition of this term from the Knight-Linehan letter of May 8.

## o NRC Contractor QA

I proposed to Jim Kennedy that 10 CFR 60, Part 6, be applied to NRC contractors. There are two compelling reasons for this. First, the NRC contractors are generating data that will be used to refute or corroborate DOE contractor data. If the data generated by the NRC contractors are not of the same pedigree as DOE's data, both agencies could lose credibility in the licensing reviews. The second, more compelling, reason for pursuing this is that if the NRC were to "qualify" one of their contractor's QA programs, we could use their "qualified" program as an example to follow. I believe the pursuit of this goal, that is, the application of 10 CFR 60, Appendix B, to the NRC contractors, should be very high on DOE/Headquarter's list of priorities.

ACTION

CC: Blaylock

CC: Vieth

CC: Blanchard

CC: Szymanski

CC: \_\_\_\_\_

CC: \_\_\_\_\_

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ENCLOSURE

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o QA Requirements/Documentation

Several of the problems that arose during our audit related to the time-lag between modifications in NYO-196-17, Headquarters approval, NRC review and approval, and implementation by the participants. There is up to 18 months of time-lag in the various QA requirements as presented in implementing documentation. This leaves inconsistencies among the Project's QA documents. In order to eliminate this issue with the NRC in the future, I propose that all draft NYO-196-17 revisions go to Headquarters and NRC for concurrence before they are issued. As you know, each revision leads to revisions to contractor QAPPs, and many of the QAPP revisions lead to further local administrative procedure revisions.

o Correspondence between NRC and DOE

Leading up to the audit were several pieces of correspondence related directly to Los Alamos that never came to our attention until long after their initiation. The most recent example is the Knight-Linehan letter of June 4, which was informally shown to me by one of the visiting NRC staff. I request that copies of future Headquarters-NRC correspondence relating to LAL programs be sent to me.

o Licensing Experience

It was noted informally that the LAL staff have limited licensing experience. I concur with this observation, and I urge DOE to undertake a more active Project-wide training program of technical staff. Although the training sessions (last year's road show, video tapes, etc.) have been interesting, they do not impart a lasting impression to the technical staff. Perhaps a more realistic approach involving real trial lawyers and mock court settings could be a first step.

In summary, we regarded the audit as a very positive experience for the Project. We look forward to working with you in the future to improve QA practices.

Sincerely,

  
D. T. Oakley

DTO:mdh

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