



Department of Energy
Washington, DC 20585

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State and Tribal Representatives (List Attached)

At the last Quality Assurance Coordinating Group meeting DOE, State, Tribal and NRC representatives discussed the policy that should be used with regard to the participation of State, Tribal and NRC representatives on DOE audits. It appears that a general consensus was reached among the meeting participants on a procedure for participating in the DOE QA auditing process. Details are in the attached draft policy statement.

We are pleased to invite your review of the enclosed draft policy statement and would appreciate knowing of any remaining concerns you may have.

Sincerely,

Stephen H. Kale
Associate Director for
Geologic Repositories, Office of
Civilian Radioactive Waste Management

Enclosure

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WM Project: WM-1
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**POLICY FOR PARTICIPATION OF STATE, TRIBAL AND NRC REPRESENTATIVES
AS OBSERVERS ON DOE AUDITS**

1. The QA Manager of OGR will furnish to the State, Tribal and NRC representatives a schedule of audits planned by DOE-HQ (OGR) and by the DOE project offices. Because of frequent changes to the schedule, the schedule will be updated at approximately monthly intervals and copies furnished to the State, Tribal and NRC representatives.
2. OGR and the project offices will make every effort to send an audit notification at least 30 days prior to each QA audit. The audit notification will, whenever possible, include an audit plan and a description of the scope of the audit. Copies of OGR audit notifications will be furnished to NRC and to all State and Tribal representatives; copies of project audit notifications will be furnished to NRC and to the affected State and Tribal representatives.
3. State, Tribal and NRC representatives may request to participate in any audit. Requests need not be in writing. Telephone contacts to request participation are:

OGR - Carl Newton - ([redacted]
BWIP - Pierre Saget - ([redacted]
WMPO - Jim Blaylock - ([redacted]
SRPO - Jerry Reese - ([redacted]

State, Tribal and NRC representatives who wish to participate will make every effort to contact the DOE representative at least two weeks prior to the audit so that arrangements for their participation can be made.

4. When a request to participate is received by DOE from a State, Tribal or NRC representative, it is DOE's policy to make every reasonable effort to honor the request. When small audit teams are used by DOE, and requests for many observers are received, it may be necessary for DOE to limit participation (but in no event to less than one observer per organizational entity, i.e., one from the affected State, one from each affected Tribe, and one from NRC), so that the auditing process will not be hampered by an excessive number of observers. In instances where the limit of one observer per affected party will still result in an excessive observer to auditor ratio, DOE will contact the affected parties and seek voluntary reductions. It is expected the parties will make every reasonable attempt to accommodate DOE's requests.

5. Observers on DOE audits will be under the authority of the audit team leader (or sub-team leader if the team is divided during the audit). Observers are encouraged to participate fully by furnishing their questions, observations and recommendations to the audit team leader (or sub-team leader). Direct interactions between observers and auditee personnel will generally be discouraged and it may be necessary to exempt observers from certain portions of an audit (such as procurement actions that are in-process, classified material, or sensitive personnel records). The DOE policy is that every effort is to be made to limit such exemptions and to include observers as full participants in all aspects of the audit possible.
6. The State, Tribal and NRC representatives who will be participating in a QA audit are to be furnished a copy of the audit checklist as soon as it is available. A target date of ten days prior to the audit will be attempted. The State, Tribal and NRC representatives who receive audit checklists are, of course, to keep their contents confidential and to not, under any circumstances, divulge its contents to representatives of the organization to be audited.
7. DOE encourages observers to receive formal QA auditor training and QA lead auditor training. Every effort to accommodate State, Tribal and NRC representatives in DOE sponsored training courses is to be made. There are, however, no DOE requirements for observers to have had such training.
8. DOE invites observers to express concerns and recommendations on the auditee's QA program to the audit team leader for his consideration in preparing the audit report. DOE also invites observations on the conduct of the audit and solicits recommendations on how we might improve our audit process. Observers will be afforded an opportunity to speak at exit meetings following each audit. Regular opportunities are to be provided to observers during the course of the audit and at the quarterly QACG meeting for State, Tribal and NRC representatives to discuss their comments and recommendations.

State and Tribal Representatives to QACG

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6/23/87

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RECORD OF CORRESPONDENCE CONCURRENCE AND DISTRIBUTION

SUBJECT: Role of Observers on DOE audits

FROM: S.Kale, RW-20

TO: States & Tribes (List attached)

PC CODE: CN 150 (MARIE ADAMS' IBM)

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S. Kale, RW-20

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OGR - Carl Newton - (202) 586-5059
BWIP - Pierre Saget - (509) 942-7250
WMPO - Jim Blaylock - (702) 295-1125
SRPO - Jerry Reese - (806) 374-2320

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