



Department of Energy
Washington, DC 20585

HQO.871019.0201

OCT 16 1987

Jack Wittman
Technical Advisor
Yakima Indian Nation
P.O. Box 151
Toppenish, WA 98948

Dear Mr. Wittman:

Thank you for your review of our Quality Assurance Plan and for the comments in your letter of August 19, 1987. We appreciate your careful review and your interest in our program. We have evaluated your comments and provided proposed dispositions (attached).

We welcome the opportunity to discuss these comments and dispositions with you. Should you have any questions or require additional information, please contact me at (202) 586-5059 or Karl Sommer of my staff at (202) 586-1639.

Sincerely,

James P. Knight, Director
Siting, Licensing & QA Division
Office of Geologic Repositories

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WM Project: WM-1
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HQ-OGR Responses to the Yakima Indian Nation
Comments on the HQ-OGR QA Plan OGR/B-3, Rev. 1

1. To be incorporated.
2. To be incorporated.
3. To be incorporated. - The Section describing "Interactions" will be elaborated upon in Revision 2 of OGR/B-3, which is currently ongoing.
4. Not to be incorporated - As stated in Supplement 7, the reviewer must be independent of performing the work being reviewed and shall have qualifications at least equivalent to those required for performance of the original work. The requirements of this Supplement do not limit all peer reviewers as being from the DOE/contractor's organization. It is the responsibility of each organization to define the selection process for a peer review group; which may or may not include a member who is independent from the DOE. By the nature of some of the unique subject matter of the work being performed in support of this program, it might prove to be difficult obtaining the services of a qualified reviewer who is independent of the DOE or its contractors. Therefore, the DOE does not agree with adding the requirement that you suggest.
5. Based on the OCRWM Director's Statement on Quality Assurance, the definition/application of Quality Level 2 has been clarified. This clarification will be incorporated into the OGR QA Plan that is currently being revised.
6. Not to be incorporated - Baseline Change Control is discussed in DOE/RW-0068 "OGR Program Baseline Procedures Notebook." The purpose of this document is to explain the Baseline Management Concept and how changes to Baseline Documents are controlled. To explain the process again in OGR/B-3 (or any other Baseline Document) is unnecessary. The only relationship between OGR/B-3 and DOE/RW-0068 is that OGR/B-3 is one of the documents controlled by it.
7. Not to be incorporated - Section 3.3 states that the Project Manager is responsible for establishing and implementing a Project Office QA Program.. He will fulfill this responsibility by establishing a QA organization, as explained in Section 3.4, "Organizational Independence". This section describes the responsibilities of the QA organization in carrying out the implementation of the QA Program. Note that this section explains that QA has a separate reporting chain and organizational independence.
8. OGR/B-3 will be revised to add that copies of "visual aides" will be retained as records. If, upon finalization of the LSS Program, it is determined that video material will not be retained, an explanation will be provided at that time.
9. To be incorporated - QIP 18.3 will be revised to clarify examination and educational requirements for auditors and audit team leaders.
10. To be incorporated - See #9 above.

11. To be incorporated - Supplement #4 will be revised to indicate that these lists are not all-inclusive.
12. The OGR QA Plan is currently being revised. The clarification requested in this comment will be provided for in this next revision.
13. Comment no longer applicable - "major" to be deleted from text.
14. The intent of the last sentence in paragraph 5.4 needs clarification. The intent is that if a technical representative participates in an audit he/she will be qualified in the technology being audited. It should be noted that not all audits will have a technical representative on the audit team. This will be determined based on the scope of the audit. OGR/B-3 will be revised to clarify that when the scope includes auditing technical activities, audit teams shall include a technical representative who is trained and/or qualified in the technology being audited.
15. We agree - The interactions Section will provide that this documentation is made available to the States and Tribes and every effort will be made to forward this documentation as soon as possible. This includes documentation of both the identification of the problem and the resolution.



Department of Energy
Washington, DC 20585

HQO.871019.0198

OCT 16 1987

Mr. S. P. Kraft
Director, Utility Nuclear
Waste Management Group
1111 19th Street
Washington, D.C. 20036-3691

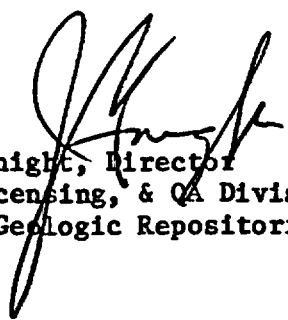
Subject: DOE-OGR Proposed Dispositions to UNWMG's Comments
on OGR QA Plan (OGR/B-3), Revision 1

Dear Mr. Kraft:

Thank you for your review of our Quality Assurance Plan and for the comments in your letter of August 13, 1987. We appreciate your careful review and your interest in our program. We have evaluated your comments and provided proposed dispositions (attached).

We look forward to discussing these matters with you in detail after you have received and reviewed these proposed dispositions. Should you have any further questions/comments, please contact me at (202) 586-5059 or Karl Sommer of my staff at (202) 586-1639.

Sincerely,


James P. Knight, Director
Siting, Licensing, & QA Division
Office of Geologic Repositories



Proposed Dispositions to the UNWMG Comments
on the DOE OGR QA Plan (OGR/B-3)
(August 1986 Revision)

- 1.(a) - DOE-OGR has identified the OGR QA Manager's reporting level as an issue requiring resolution and is currently in the process of addressing this issue.
- 1.(b) - DOE-OGR recognizes Headquarter's role and responsibility in providing Program QA Policy direction, guidance, leadership, integration and coordination, and the associated QA management experience required to accomplish this role and responsibility. DOE-OGR is seeking a candidate with the necessary QA management experience, to fill the OGR QA manager position. With regard to the qualification requirements described in para. 3.2.6 of the OGR QA Plan, these requirements will be revised to reflect the qualification requirements of the OGR QA manager position resulting from the actions being taken by DOE-OGR as noted in response to comment #1. (a).
- 1.(c) - While the recommendation of centralized reporting of OGR QA management is one approach to structuring the OGR QA organization, it is not consistent with the current decentralized organizational structure within the Department of Energy. Since the OCRWM Program is under the jurisdiction of the Department of Energy, the OGR QA organization and responsibilities have been established in accordance with the Department of Energy's organization and responsibility hierarchy. The decentralized organizational structure is the management approach that the Department of Energy has determined maximizes the efficiency, productivity and control of major programs, based on the experience gained in administration of other programs of comparable scope and complexity.
2. As stated in the response to comment 1(c) above, the recommended DOE-OGR Headquarters centralized quality systems approach is not consistent with the current decentralized organizational structure within the Department of Energy. As written, the supplements to the OGR QA Plan do provide Program QA guidance in an attempt to promote consistency among the Project Office QA programs. As a result of the organization hierarchy and assignment of responsibilities within the Department of Energy, and the noted major organizational differences between the three Project Offices and their respective contractor relationships, a DOE-OGR Headquarters Centralized Quality Systems Program approach is not consistent with the Program requirements and needs. The Program quality system detail of the "who", "what", "when", "where" and "how" must be defined at the Project Office level. One of the primary objectives of the OGR Quality Assurance Coordinating Group is to establish Quality Systems Guidance, controls, integration and coordination, in order to establish and maintain a unified, coordinated Program Quality System.

3. The wording in the OGR QA Plan regarding the responsibility for the assurance of quality reflects the quality policies established for the OCRWM Program in the Quality Assurance Management Policies and Requirements (QAMPR) document (DOE/RW-0032). As stated in Section 1, paragraph 1.1 of this document:

"The assurance of quality achievement is a major and continuing commitment of managers at all levels in the Program. To this end, well defined, consistent and continuous QA management policies and requirements are to be established and applied — systematically and selectively — to all items and activities. Quality achievement is to be assured to demonstrate that the work was done completely and correctly. QA activities are to be directed toward prevention and early identification and correction of significant quality problems."

It is DOE OCRWM's position that the assurance of quality is a continuing commitment of managers at all levels in the Program. This should not be confused with, nor does it dilute or detract from, the QA function of independent verification and assessment of quality achievement.

4. DOE-OGR is currently in the process of clarifying the program quality level/graded QA requirements based on the recently issued Director's statements on Quality Assurance and Quality Management. In an effort to address this noted issue, an agenda item has been added to the October 22, 1987 QACG meeting agenda for a presentation by EEI on the utilities' approach to quality level classification/graded. QA.

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WM Project 1

Docket No. _____

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