



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 22 1988

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

Dear Mr. Stein:

Based on our observations of quality assurance audits performed by the Waste Management Project Office (WMPO) and our review of your exploratory shaft facility (ESF) and study plan activities, the Nuclear Regulatory Commission (NRC) staff is concerned with the Department of Energy's (DOE) implementation of design control for the repository program. This point was most recently raised during the July 18 and 19, 1988 ESF meeting and in my August 5, 1988 letter to you on our review of DOE's study plans.

At the ESF meeting, it was established that the DOE approach to ESF design control was unacceptable to the staff. It is the staff's position that this lack of an adequate design control process is a root cause of many of the outstanding ESF design issues. The NRC staff has expressed similar design control concerns in its August 5, 1988 letter to you on the development of study plans.

The staff is also concerned that DOE is conducting little or no investigations of design control in its audits. In particular, the NRC staff did not observe a detailed level of review and oversight of the design control process during a recent WMPO audit of Fenix and Scisson, nor did the staff observe any investigation of the development process for scientific investigation plans or study plans during the two WMPO audits of the U. S. Geological Survey.

While the staff recognizes that DOE and its contractors do not yet have NRC accepted quality assurance plans, design control is an important area that must be implemented for ongoing activities and covered in DOE/WMPO audits. Given the design control problems identified to date, the NRC staff believes this area should be a primary focus of all future WMPO audits, and the staff will continue to identify this as a deficiency, if it is not completely covered.

In order for the NRC staff to gain confidence that proper design controls have been fully implemented for the ESF and other work, DOE must clearly demonstrate that the identified concerns have been satisfactorily resolved. Realizing the critical path nature of the schedule for design and construction of the ESF, DOE should ensure that immediate attention is given to the design control concerns

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Mr. Ralph Stein

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raised by the NRC staff. Because design control is a vital element of the repository program, the acceptable implementation of design controls will be a significant factor in the overall acceptability of the DOE quality assurance program.

If you have any questions concerning this letter, please contact me on FTS 492-3387.

Sincerely,

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John J. Linehan, Acting Chief
Operations Branch
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

cc: C. Gertz, DOE/NV
R. Loux, State of Nevada

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