

JAN 18 1989

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Mr. Sam Rousso, Acting Director  
Office of Civilian Radioactive Waste Management  
U. S. Department of Energy  
Washington, D. C. 20545

Dear Mr. Rousso:

SUBJECT: STATUS OF QUALITY ASSURANCE PROGRAM DEVELOPMENT AND REVIEW

The purpose of this letter is to identify a concern the U. S. Nuclear Regulatory Commission (NRC) staff has with the development and implementation of quality assurance (QA) plans by the U. S. Department of Energy (DOE). As I am sure you know, the NRC staff identified the need to qualify the QA programs as an objection in its point papers on the Consultation Draft Site Characterization Plan. Based on this objection, DOE reiterated our previous agreement not to begin any new site characterization work until the QA programs were qualified. In July 1988, members of the NRC staff and representatives from DOE jointly prepared a schedule that established the milestones necessary to accomplish this qualification.

Since the development of the July 1988 schedule, DOE has submitted three of the QA documents identified. Although two of these three were the requirements documents that form the basis for establishing the individual QA programs, DOE has not provided any of the prime contractor QA plans or the Yucca Mountain Project Office plan. The third document provided was the QA program description for the Office of Civilian Radioactive Waste Management. The staff realizes that an important step was accomplished by having the requirements documents in place. However, DOE and its contractors must continue to work to develop and implement the actual QA program plans and implementing procedures. The need to work on program implementation is evident from recent DOE audits of the prime contractors. In these audits, the DOE teams identified significant deficiencies with a majority of the contractors' programs. Because of this, it is important that a schedule for developing acceptable programs and conducting the audits necessary to qualify the QA programs be established and met.

It is my understanding that representatives from DOE will be meeting with members of the staff on January 25, 1989, and that one of the topics for that meeting will be the revised schedule for DOE submittal of QA Plans and audit of the QA programs. It is important that DOE management, as well as its prime

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contractor management, take the steps necessary to ensure that the qualifications of the QA programs occur on an appropriate schedule. Because of the importance of the upcoming meeting, it may be beneficial for us to attend that part of the meeting covering the schedules. I would be interested in your opinion on this.

If you have any additional questions, please feel free to contact me or Mr. John J. Linehan of my staff, who can be reached at (301) 492-3387 or FTS 492-3387.

Sincerely,

(Signed) Robert M. Bernero

*for*

Hugh L. Thompson, Jr., Director  
Office of Nuclear Material Safety  
and Safeguards

- cc: C. Gertz, DOE/NV
- R. Loux, State of Nevada
- M. Baughman, Lincoln County
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