

AUG 06 1990

Mr. Bruce Mabrito, Director
Quality Assurance
Center for Nuclear Waste Regulatory Analyses
P.O. Drawer 28510
6220 Culebra Road
San Antonio, Texas 78284

Dear Mr. Mabrito:

SUBJECT: OBSERVATION AUDIT OF CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

From June 26 through 28, 1990, members of the U.S. Nuclear Regulatory Commission (NRC) staff participated as observers in the Center for Nuclear Waste Regulatory Analyses (CNWRA) Quality Assurance (QA) Audit No. CNWRA 90-1 conducted in San Antonio, Texas. The NRC staff evaluated this audit to gain confidence that the CNWRA is effectively implementing the requirements of its QA program. This letter transmits NRC Observation Audit Report No. 90-4 for the CNWRA audit.

The audit was performed as part of the CNWRA's regular audit program, and it coincided with the implementation of Revision 2 to the Center Quality Assurance Manual (CQAM) which reflected lessons learned from two years of operational experience. As indicated in the CNWRA Audit Plan, the audit was limited to the CNWRA's activities associated with QA programmatic controls such as those related to corrective action and document and records control. The auditor, who was from Southwest Research Institute, was well qualified in the QA disciplines, and the checklist was adequate for the areas that were evaluated.

In general, the NRC staff agrees with the auditor's findings in the areas of corrective action, QA records, and internal audits. It was noted that the CNWRA QA staff shows a genuine concern for continuing to improve its QA program. However, due to the fact that very few quality affecting activities have been performed under the current revision of the CQAM and a limited quantity of technical products have been issued to date, the effectiveness of the CNWRA QA program in controlling work cannot be determined at this time. An effectiveness conclusion can be reached when sufficient QA and technical implementing procedures have been finalized and a sufficient amount of work is accomplished under these procedures to demonstrate the implementation of the applicable QA requirements in the QA program.

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The NRC staff will observe the audit scheduled later in 1990 to determine if the CNWRA is continuing to implement its QA program in an acceptable manner. If you have any questions, please call Mark Delligatti on 301/FTS 492-0430.

Sincerely,

Kenneth R. Hooks, Section Leader
Quality Assurance
Repository Licensing and Quality Assurance Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety and Safeguards

Enclosure: As stated

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