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FEB 05 1991

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 December 4-6, 1990, a member of the U.S. Nuclear Regulatory Commission (NRC) staff participated as an observer in the Center for Nuclear Waste Regulatory Analyses (CNWRA) Quality Assurance (QA) Audit No. CNWRA 90-3 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. 91-3 for the CNWRA audit.

The audit, which was performed as part of the CNWRA's regular audit program, was to evaluate the implementation of QA controls associated with CNWRA technical activities. As indicated in the CNWRA Audit Plan, technical activities to be audited included eight Research Projects and seven tasks associated with Operation Plans. The auditors, who were from Southwest Research Institute, were 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 auditors' preliminary findings that the CNWRA QA program controls are being adequately implemented in the areas that were evaluated, with one exception. The auditors noted that a number of activities were being performed without approved and controlled instructions or procedures in place. The failure to develop implementing procedures has been identified in the past, and this recurring problem should warrant prompt management attention.

CNWRA QA personnel should closely monitor the QA program to ensure that future implementation is carried out in an adequate manner. The NRC staff expects to

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participate in this monitoring as observers and may perform its own independent audit at a later date to assess the adequacy and effectiveness of the CNWRA QA program.

A written response to this letter or the enclosed report is not required. If you have any questions, please call Jim Conway on (301) 492-0453.

Sincerely,

**ORIGINAL SIGNED BY**

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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