

MABRITO LETTER

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

MAR 14 1989

Dear Mr. Mabrito:

SUBJECT: OBSERVATION OF CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES QUALITY ASSURANCE AUDIT

Staff members of the U. S. Nuclear Regulatory Commission (NRC) participated as observers in your February 27 - March 1, 1989 internal quality assurance (QA) audit of Center for Nuclear Waste Regulatory Analyses (CNWRA) activities. The purpose of our observation was to evaluate the audit of the CNWRA QA program.

The audit, as indicated in the CNWRA Audit Plan, was limited to evaluating program architecture (PA) activities for compliance with the Center Quality Assurance Manual (CQAM) and selected Technical Operating Procedures (TOPs). The NRC staff determined that, considering the stated scope, the audit was performed in an acceptable manner and resulted in meaningful findings and the CNWRA is adequately implementing the QA program as it applies to program architecture activities. Although the limited scope was acceptable for an initial audit, the NRC staff expects future CNWRA QA audits to evaluate CNWRA technical work and work products.

Our preliminary evaluation of the audit findings indicates that the CNWRA should review the CQAM and TOPs for compatibility with the actual PA work activities. In addition, the CNWRA should define which documents and records generated by PA work activities are quality assurance records requiring handling in accordance with 10 CFR Part 50, Appendix B. Resolution of this concern will probably warrant NRC and CNWRA upper management involvement at a future management meeting. We request that you provide a schedule for the accomplishment of these items after you evaluate the audit findings and formulate your corrective action plans.

If you have any questions, please contact me on (301) 492-0430 or Ken Hooks on (301) 492-0447.

Sincerely,
ORIGINAL SIGNED BY
 Mark S. Delligatti, QA-Sub Element Manager
 Engineering Branch
 Division of High-Level Waste Management

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 PDR WASTE
 WM-11 PDC

Enclosure: Observation Audit Report

cc: R. Browning
 J. Funches
 S. Fortuna
 J. Latz, CNWRA
 M. Mace

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