

memorandum

DATE: SEP 14 1987

REPLY TO: RW-24
ATTN OF:

SUBJECT: Surface Base Testing Candidates for NRC Mini-Audits

TO: Ralph Stein, RW-23

In reference to the discussion at the last Project Manager's meeting regarding possible Surface Base Testing Candidates for NRC conducted mini-audits, we have reviewed mini-audit activities to date.

The SRPO and WMPO Projects selected several candidates for NRC mini-audits (refer attached letter copy Knight-OGR to Linehan-NRC, dated 12-16-86). The BWID Project indicated they were not ready to participate in the NRC mini-audit program. The SRPO and WMPO Projects, based on results of previous audit/surveillance activities, indicated selection and rationale for the following mini-audits:

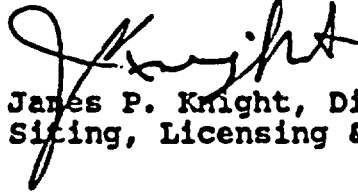
- o ANL - areas of Technical and Peer Reviews, SRPO Project.
- o LANL - areas of Mineralogy and Petrology, WMPO Project.
- o TBEG - activities pertaining to the Core Research Center and the Mineral Studies Laboratory, SRPO Project.

The results of recently conducted pre-audits of ANL and TBEG by the respective Project Office, with HQ/OGR audit participation, has indicated, in the opinion of HQ/OGR participants, that corrective actions (including follow-up audits) are necessary prior to a NRC conducted mini-audit. The NRC final report pertaining to the recent NRC conducted mini-audit of LANL has not been received to date. However, NRC has informally advised that the audit report will include several findings, deficiencies, observations. The attached summary denotes the current status of these mini-audit activities.

In view of the results on the mini-audit activities, and our joint assignment pertaining to possible Surface Base Testing Candidates for NRC conducted mini-audits, it is suggested the HQ/OGR Engineering and Geotechnology Division (RW-23) interface with the three (3) Projects and identify appropriate candidates. The HQ/OGR SL&QA Division (RW-24) will participate in pre-audits of the selected candidates and will also schedule the activities with the NRC.

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PDR WASTE
WM-10 PDR

We would appreciate your advice.

A handwritten signature in cursive script, appearing to read "J. Knight".

James P. Knight, Director
Siting, Licensing & QA Division

WM-11(2)
WM-16(2)

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Department of Energy
Washington, DC 20585

DEC 16 1985

Mr. John L. Linehan, Acting Chief
Repository Projects Branch
Division of Waste Management
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Linehan:

As requested during NRC and OGR staff discussions regarding mini-audits for small, precisely defined areas of work, the following is a listing of suggested areas for mini-audits by the NRC:

SRPO Project

- o TBEG - Sample Storage Facility
- o ONWI - Technical Reviews/QA Department
- o PB/PB-KBB- Whole Program
- o PNL - Waste Package Corrosion Laboratory Work
- o ANL - Technical and Peer Review

WMPO Project

- o SAIC - Meteorological Monitoring
- o SAIC - Site Characterization Plan
- o LANL - Mineralogy and Petrology
- o LANL - Assignment of QA Levels for the following tasks:

WBS	1.2.3.4.1.1	Groundwater Chemistry
	1.2.3.4.1.2	Natural Isotope Chemistry
	1.2.3.4.1.3	Hydrothermal Geochemistry
	1.2.3.4.1.4	Solubility Determination
	1.2.3.4.1.5	Sorption & Precipitation
	1.2.3.4.1.6	Dynamic Transport Process
	1.2.3.4.1.7	Retardation Sensitivity Analysis
	1.2.3.4.1.8	Applied Diffusion

- o LLNL - Spent Fuel Dissolution Tests, Series III
- o LLNL - Spent Fuel Oxidation Work - Thermogravimetric Analysis and Dry Bath Tests (WBS 1.2.2.3.1)
- o SNL - Assignment of QA Levels for the following tasks:

WBS	1.2.4.1.2	Design Basis
	1.2.4.3.2	Surface Facilities

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1.2.4.3.3	Shafts/Ramps
1.2.4.3.4	Underground Excavations
1.2.4.3.5	Underground Services
1.2.4.4	Operations & Maintenance
1.2.3.2.1	Site Geology
1.2.1.3.1	Tuff Data Base
1.2.1.3.2	Computer Graphics
1.2.1.3.3	Reference Information Base

It is suggested that you review the areas of work noted above, and select candidates for the initial stage of the NRC mini-audit program. We will be happy to meet with you to discuss these options in more detail or answer any questions you may have.

The DOE/OGR, upon receipt of your preferences for mini-audit topics, will be happy to work with you in arriving at a schedule for the mini-audits. We will provide NRC information that substantiates that a specific area of work is ready for a mini-audit.

During the first quarter of calendar year 1987 the DOE/OGR will provide you with an expanded listing for mini-audits, including specific BWIP project areas of work proposed for mini-audits.

Sincerely,



James R. Knight, Director
Siting, Licensing & Quality
Assurance Division, Office of
Civilian Radioactive Waste Management

Summary of QA Audits for Candidates for
NRC Mini-Audits

Argonne National Laboratory (ANL)

1. SRPO QA Audit of ANL (5/27-28/87)

Results: 2 Findings
1 Observation

An evaluation was performed for informational purposes concerning the ANL peer review process and compliance with the NRC's Draft Generic Technical Position (GTP) on Peer Review. Although the results were not noted in the SRPO QA Audit Report, the HQ-OGR representative issued a summary report. This summary report indicated that the ANL Peer Review Program does not fully address the guidance contained in the GTP. It was recommended that ANL be removed from the list of candidates for a NRC Mini-Audit pending further development of Peer Review: ANL's Program.

Findings

The findings were programmatic and involved compliance with procedures for training and surveillance.

Observation

The observation was programmatic and involved compliance with the procedure for peer review.

Los Alamos National Laboratory (LANL)

1. WMPO QA Audit of LANL (3/30-4/3/87)

Results: 11 Findings
10 Observations
4 Recommendations

The audit team evaluation indicated that the Mineralogy/Petrology area was ready for a NRC audit.

Findings

Nine of the eleven findings were programmatic. Findings identified were due to the lack of implementation of procedural requirements or the lack of procedural detail within procedures.

The other two findings were in the technical area. Some lab books were not receiving a three-month peer review and technical procedures did not exist for all activities.

Observations

Five of the ten observations were programmatic. The other five observations were in the technical areas of control, scheduling and identification of technical activities.

Recommendations

The four recommendations identified suggested changes in procedures for clarification.

2. NRC Mini-Audit of LANL (6/8-12/87)
Tentative Results: 4 Findings
13 Deficiencies
4 Observations

Findings

The four findings were programmatic. They involved organization, training, certification and procedural detail.

Deficiencies

Eleven of the thirteen deficiencies were programmatic. They identified lack of procedural implementation, lack of procedural detail and lack of procedures. The other two deficiencies were of a technical nature and involved lab notebook control and identification of samples.

Observations

The four observations identified the need to comply with procedures or for procedural clarification.

Texas Bureau of Economic Geology (TBEG)

1. SRPO QA Audit of TBEG (7/14-16/87)
Results: 5 Findings
4 Observations
2 Concerns

It was recommended by the HQ-OGR representative that the proposed NRC Mini-Audit be postponed pending corrective action by TBEG and a follow-audit performed by SRPO.

Findings

The findings identified examples of noncompliance with existing procedures and a lack of procedures to direct work being performed.

Observations

The observations identified the need for additional procedural controls and more detailed procedures.

Concerns

The core storage facility is not protected from severe weather. The storage of duplicate QA records is not in accordance with procedures.

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SUBJECT: Surface Base Testing Candidates for NRC Mini-audits

FROM: J. P. Knight, RW-24

TO: R. Stein, RW-23

PC CODE: KS112 (MARIE ADAMS' IBM)

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CONCURRENCES:

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