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memorandum

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REPLY TO
ATTN OF:

Role of Observers on DOE Audits

SUBJECT:

TO: J.Anttonen-BWIP
J.Neff-SRPO
D.Vieth-WMPO

The attached Draft Policy For Participation of State, Tribal and NRC Representatives as Observers on DOE Audits, is to be implemented, on an interim basis, until such time as the Draft Policy has been approved by DOE/HQ/OGR.

James P. Knight
James P. Knight, Director
Siting, Licensing and Quality
Assurance Division, OCRWM

Attachment

WM Record File

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WM Project 10, 11, 16
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6/23/87

QACG Members

Pierre Saget
BWIP Project Office
DOE Richland
710 Jadwin Ave.
P. O. Box 550
Richland, WA 99352

Rodger Johnson
Rockwell Hanford Operations
Energy Systems Group
Rockwell International
P. O. Box 800
Richland, WA 99352

Jake Lefman
Battelle
Project Management Division
505 King Avenue
Columbus, OH 43201

John Rinaldi
U.S. Dept. of Energy
2753 S. Highland Dr.
Las Vegas, NV 89109

E. A. Patzer
Battelle
Project Management Division
7000 South Adams Street
Willowbrook, IL 60521

Stan Klein
The Valley Bank Ctr.
101 Convention Ctr. Drive
Suite 407
Las Vegas, NV 89109

Bud Kehew
Quality Assurance Manager
Repository Technology and
Transportation Division
9800 S. Cass Ave.
Argonne, IL 60439

Jim Blaylock
U.S. Dept. of Energy
Waste Management Project Ofc.
U. S. Dept. of Energy
2753 S. Highland Drive
Las Vegas, NV 89109

Jerry Reese
U. S. Dept. of Energy
SRPO
110 North 25 Mile Avenue
Hereford, TX 79045

Clarence Williams
Battelle
Project Management Division
505 King Avenue
Columbus, OH 43201

Mike Flannigan
Project Manager and Energy Division
U.S. Dept. of Energy
9800 S. Cass Avenue
Argonne, IL 60439

Gary Faust
Roy F. Weston
955 L'Enfant Plaza
8th Floor
Washington, D.C. 20024



Department of Energy
Washington, DC 20585

JUL 14 1987

State and Tribal Representatives (List Attached)

At the last Quality Assurance Coordinating Group meeting DOE, State, Tribal and NRC representatives discussed the policy that should be used with regard to the participation of State, Tribal and NRC representatives on DOE audits. It appears that a general consensus was reached among the meeting participants on a procedure for participating in the DOE QA auditing process. Details are in the attached draft policy statement.

We are pleased to invite your review of the enclosed draft policy statement and would appreciate knowing of any remaining concerns you may have.

Sincerely,

A handwritten signature in cursive script that reads "S. H. Kale".

Stephen H. Kale
Associate Director for
Geologic Repositories, Office of
Civilian Radioactive Waste Management

Enclosure



POLICY FOR PARTICIPATION OF STATE, TRIBAL AND NRC REPRESENTATIVES
AS OBSERVERS ON DOE AUDITS

1. The QA Manager of OGR will furnish to the State, Tribal and NRC representatives a schedule of audits planned by DOE-HQ (OGR) and by the DOE project offices. Because of frequent changes to the schedule, the schedule will be updated at approximately monthly intervals and copies furnished to the State, Tribal and NRC representatives.
2. OGR and the project offices will make every effort to send an audit notification at least 30 days prior to each QA audit. The audit notification will, whenever possible, include an audit plan and a description of the scope of the audit. Copies of OGR audit notifications will be furnished to NRC and to all State and Tribal representatives; copies of project audit notifications will be furnished to NRC and to the affected State and Tribal representatives.
3. State, Tribal and NRC representatives may request to participate in any audit. Requests need not be in writing. Telephone contacts to request participation are:

OGR - Carl Newton - (202) 586-5059
BWIP - Pierre Saget - (509) 942-7250
WMPO - Jim Blaylock - (702) 295-1125
SRPO - Jerry Reese - (806) 374-2320

State, Tribal and NRC representatives who wish to participate will make every effort to contact the DOE representative at least two weeks prior to the audit so that arrangements for their participation can be made.

4. When a request to participate is received by DOE from a State, Tribal or NRC representative, it is DOE's policy to make every reasonable effort to honor the request. When small audit teams are used by DOE, and requests for many observers are received, it may be necessary for DOE to limit participation (but in no event to less than one observer per organizational entity, i.e., one from the affected State, one from each affected Tribe, and one from NRC), so that the auditing process will not be hampered by an excessive number of observers. In instances where the limit of one observer per affected party will still result in an excessive observer to auditor ratio, DOE will contact the affected parties and seek voluntary reductions. It is expected the parties will make every reasonable attempt to accommodate DOE's requests.

5. Observers on DOE audits will be under the authority of the audit team leader (or sub-team leader if the team is divided during the audit). Observers are encouraged to participate fully by furnishing their questions, observations and recommendations to the audit team leader (or sub-team leader). Direct interactions between observers and auditee personnel will generally be discouraged and it may be necessary to exempt observers from certain portions of an audit (such as procurement actions that are in-process, classified material, or sensitive personnel records). The DOE policy is that every effort is to be made to limit such exemptions and to include observers as full participants in all aspects of the audit possible.
6. The State, Tribal and NRC representatives who will be participating in a QA audit are to be furnished a copy of the audit checklist as soon as it is available. A target date of ten days prior to the audit will be attempted. The State, Tribal and NRC representatives who receive audit checklists are, of course, to keep their contents confidential and to not, under any circumstances, divulge its contents to representatives of the organization to be audited.
7. DOE encourages observers to receive formal QA auditor training and QA lead auditor training. Every effort to accommodate State, Tribal and NRC representatives in DOE sponsored training courses is to be made. There are, however, no DOE requirements for observers to have had such training.
8. DOE invites observers to express concerns and recommendations on the auditee's QA program to the audit team leader for his consideration in preparing the audit report. DOE also invites observations on the conduct of the audit and solicits recommendations on how we might improve our audit process. Observers will be afforded an opportunity to speak at exit meetings following each audit. Regular opportunities are to be provided to observers during the course of the audit and at the quarterly QACG meeting for State, Tribal and NRC representatives to discuss their comments and recommendations.

State and Tribal Representatives to QACG

Mr. Allan V. Pinkham, Chairman
Nez Perce Tribal Executive Committee
Box 350, Main Street
Lapwai, ID 83540

Mr. Elwood Patawa, Chairman
Board of Trustees
Umatilla Confederated Tribes
P. O. Box 638
Pendleton, OR 97801

Mr. Melvin R. Sampson, Chairman
Yakima Tribal Council
Yakima Indian Nation
P. O. Box 151
Toppenish, WA 98948

Mr. Terry Husseman
Program Director
Office of High-Level Nuclear
Waste Management
Washington State Department
of Ecology, MS PV-11
Olympia, WA 98504

Mr. Max S. Power
Washington State Institute for
Public Policy
Science and Technology Project
The Evergreen State College
4111 Seminar Building TA-00
Olympia, WA 98505

Mr. Steve Frishman, Director
Nuclear Waste Program Office
Office of the Governor
201 E. 14th Street, Room 205
Austin, TX 78711

Ms. Ruth Ann Storey
High-Level Nuclear Waste Office
355 West North Temple
Suite 330
Salt Lake City, Utah 84180-1203

Mr. Robert Loux, Jr.
Director
Nuclear Waste Project Office
Office of the Governor
Capitol Complex
Carson City, NV 89710

Mr. Hall Bohlinger
Assistant Administrator Nuclear
Energy Division
P. O. Box 14690
Baton Rouge, LA 70898

Mr. John W. Green, Jr.
Executive Director
Department of Energy &
Transportation
214 Watkins Building
510 George Street
Jackson, MS 39202

Ms. Susan Zimmerman, Geologist
Nuclear Waste Program Office
Office of the Governor
P. O. Box 12428
Austin, TX 78711

Mr. James Reed
Advisory Committee on Institutional
Government Relations
P. O. Box 13206
Austin, TX 78711

Ms. Cheryl Runyon
National Conference of State Legislatures
1050 17th Street
Suite 2100
Denver, CO 80265

Mr. Carl Johnson
Nevada Nuclear Waste Storage
Investigation
State of Nevada
Capitol Complex
Carson City, NV 89710

Mr. Don Provost
Ofc. of High Level Nuclear Waste
Management
Department of Ecology
Mail Stop P.V. -11
5820 Pacific Avenue
Olympia, WA 98504

Mr. Stephen S. Hart
Council of Energy Resource Tribes
1580 Logan Street, Suite 400
Denver, CO 80203

Mr. Hal Aronson
Nuclear Waste Program
Yakima Indian Nation
5041 West Fair Avenue
Littleton, CO 80123

Mr. Robert Mooney
State of Washington
Dept. of Social & Health Services
Office of Radiation Protection
MS LE-13
Olympia, WA 98504

Mr. William Burke
Nuclear Waste Project Director
Umatilla Confederated Tribes
P. O. Box 638
Pendleton, OR 97801

Mr. Ronald T. Halfmoon
Nez Perce Nuclear Waste Program Manager
Nez Perce Indian Tribe
P. O. Box 350, Main Street
Lapwai, ID 83540

Dennis Bechtel, Planning Coordinator
Clark County, Nevada
225 Bridger Street
Las Vegas, NV 89155

Robert Palm
Clark County, Nevada
225 Bridger Street
Las Vegas, NV 89155

Russel Jim
Yakima Tribal Council
Yakima Indian Nation
P. O. Box 151
Toppenish, WQ 98948

Bim Oliver
355 W. North Temple
#3 Triad Center, Suite 300
Salt Lake City, Utah 84180-1203

RECORD OF CORRESPONDENCE CONCURRENCE AND DISTRIBUTION

SUBJECT: Role of Observers on DOE Audits

FROM: J. Knight

TO: J. Anttonen-BWIP, J. Neff-SRPO, and D.Vieth-WMPO

PC CODE: KS96 (MARIE ADAMS' IBM)

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CONCURRENCES:

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