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November 20, 1986

Ben Rusche, Director
Office of Civilian Radioactive
Waste Management
U.S. Department of Energy
1000 Independence Avenue
Washington, D.C. 20585

WM Record File

101.3

WM Project

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Docket No.

PDR ☒

LPDR ☒

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of

Dear Mr. Rusche:

The state of Washington appreciates the opportunity to comment on the Office of Civilian Radioactive Waste Management (OCRWM), Office of Geologic Repositories (OGR) "Quality Assurance Plan for High-Level Radioactive Waste Repositories". Earlier state of Washington comments on quality assurance issues were included as a part of our submittals on the Site Characterization Report, the General Guidelines for the Recommendation of Sites for Nuclear Repositories, the Mission Plan, and the Environmental Assessment. In each submittal we expressed concerns about the quality assurance function within the U.S. Department of Energy organization. In each submittal we expressed a concern about the lack of an adequate quality assurance program. Recent stop work orders at Hanford and Yucca Mountain again illustrated the need for a strong, independent, and accountable quality assurance programs.

It appears the writers of the currently issued version of the OGR Quality Assurance Plan were not aware of our earlier comments and comments made during Quality Assurance Coordinating Group (QAG) meetings. In our opinion, the current version must be revised to reflect our positions on several significant areas.

Our comments are divided into general comments on organization, accountability, independence, and matrix management, plus detailed comments on specific sections of the plan.

Previous state of Washington comments have emphasized the need for organizationally recognizing the importance of quality assurance. As a minimum, the OCRWM Quality Assurance Manager should report directly to the OCRWM Director, the OGR Quality Assurance Manager should report directly to the OGR Associate Director, and the each field site quality assurance manager should report directly to the field site project manager. Each quality assurance manager must be fully accountable for appropriate functions, be independent of project cost and schedule considerations, and report directly to one boss.

The OCRWM organization chart indicates the OCRWM QA Manager reporting directly (solid line) to the Office of Policy and Outreach Director, with an unexplained dotted line to the OCRWM Director. The OGR organization chart indicates the OGR QA Manager reports directly to the Licensing and QA Branch Chief, who reports to the Siting,

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Licensing and Quality Assurance Division Director, who reports to the OGR Associate Director, who reports to the OGR Associate Director. The chart shows unexplained dotted lines from the QA Manager to the OGR Associate Director and the OCRWM QA Manager. This leads one to conclude that the OGR QA Manager has three bosses. This is the classic case of matrix management, where the QA Manager does not report to one boss and cannot be accountable for the QA function. The person reporting directly to the OGR Associate Director has responsibility for siting and licensing, plus the quality assurance function. This person is, therefore, not independent of projects and costs and schedule.

Figure 3-3 shows the Basalt Site Richland Operations Office (BWIP) with program/project responsibilities and reporting directly to the Office of Geologic Repositories (headquarters). The Department of Energy Richland Operations Office shows the BWIP Project Manager reporting directly to the Richland Operations Manager. This is another example of the project manager working for two bosses. In the past, the BWIP Project Manager has been on extended "special assignments" for the Operations Office. On several occasions, the QA Manager temporarily sat in for the project manager while the project manager was on special assignment. During this period, the QA Manager was clearly responsible for BWIP costs and schedules. The Quality Assurance Plan must address this issue in more detail.

The OGR QA plan does not address the issues of how many USDOE QA persons should be on staff to oversee contractors. At Hanford there has been a unacceptable ratio of USDOE QA persons to contractor QA persons. USDOE is accountable for the quality of work and must provide an adequate number of USDOE quality assurance persons to ensure quality. Recent Hanford QA problems and the resulting stop work orders at Hanford illustrate the problem. The OGR QA plan should discuss this issue and the plan should specify an appropriate ratio.

Specific comments are as follows:

- 2.3.1 The Mission Plan should provide an informational basis sufficient to permit informed decisions, but recent USDOE decisions regarding a second repository have severely reduced the value of the document.
- 3.1 The statement that the "QA management functions responsibilities and authorities for OGR have been assigned by the Director, OCRWM to the Associate Director OGR" seems inconsistent with figure 3.1.
- 4.3.2.d The OGR QA Manager "overview" funding for QA activities and identified insufficient resources through the Licensing and QA Branch Chief through the SLQA Division Director to the Associate Director OGR. This appears to illustrate our concern about the level of QA personnel within the USDOE organization.
- 4.3.2.e.1 Project office QA plans and procedures should be submitted to the appropriate states and affected Indian tribes for their review and comment.
- 4.3.2.e.3 The appropriate state and affected Indian tribes should be invited to participate in project readiness reviews. The invitation should include early access to data.

4.3.2.f.6 Results of surveillance performed should also be reported to the appropriate states and affected Indian tribes.

4.6 OGR QA Supplement #6 should be changed to indicate that states and affected Indian tribes will be notified at the time significant quality problems are identified and again when resolved. Significant problem reporting and corrective action records are a significant part of the record for NRC licensing and as such should become permanent records.

5.3.1 The project QA plan and/or applicable QA administrative procedures should describe a process for review and comment by appropriate states and affected Indian tribes.

Appendix A - Quality Assurance Manual Evaluation-Handling, Storage and Shipping --
Requirements for control of samples from collection of the sample analysis should be established and documentation for control of each sample must be provided.

Supplemental QA Requirements - Supplement No. 11

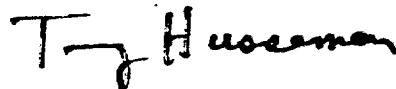
1.0 Appropriations have been approved to begin preliminary design work on the Hanford Waste Vitrification Plant and criteria are being developed to determine which wastes should be vitrified. Both activities require an adequate QA program. The supplement should be amended at this time to include Hanford wastes.

Supplemental QA Requirements - Supplement No. 12

We question whether this supplement is appropriate. Arbitrarily limiting non-DOE observers to one observer during each audit cycle is contrary to the NWPA because the states, tribes and NRC have a statutory role which allows participation. USDOE should substitute a process whereby states, tribes and NRC are encouraged to cooperate on audits and the audit team is made up of the most highly qualified personnel.

Please contact me or Don Provost if you have questions.

Sincerely,



Terry Husseman, Director
Office of Nuclear Waste Management

TH:hlt

cc: Jim Knight
Carl Newton