

MAY 5 1988

Distribution:

WM S/F	PHildenbrand
WMRP r/f	RCook
NMSS	PPrestholt
CF	TVerma
REBrowning	JGiarratana
MJBell	PDR
JOBunting	DHedges & r/f
MRKnapp	SBilhorn
PJustus	BHill
JGreeves	TAnkrum
JLinehan	JTrapp
RBoyle	MNataraja
SCoplan	DMattson
JKennedy	FCameron
RJohnson	
KStablein	

MEMORANDUM FOR: Paul Hildenbrand
Repository Projects Branch, DWM

FROM: Dale Hedges
Repository Projects Branch, DWM

SUBJECT: APPENDIX 7 VISIT TO DISCUSS SUGGESTED CHANGES TO NRC
REVIEW PLAN, AND DISCUSS NRC OBSERVATIONS RELATIVE TO MAC
AUDITS

The purpose of the visit was to discuss the status of the BWIP quality assurance program, discuss any suggested changes to the NRC Review Plan, and to discuss NRC observations relative to audits conducted by MAC for DOE.

The status of the stop work order to Rockwell by DOE was discussed. A plan for restart of work is in development by DOE. It is likely that work will be released for restart in increments.

Recent audits conducted by MAC for DOE and observed by NRC were discussed. I explained the rationale for conclusions I reached in my observations of and reporting on the MAC audit of Rockwell's audit and surveillance program. I had concluded that Rockwell's audit and surveillance programs were ineffective (see trip report). Also discussed were the MAC preparations for audits, selection of personnel for the audit team, and analysis and reporting of results. MAC stated that they plan a revision to the audit process that considers the NRC concerns.

The methods to be used by the DOE to overview and control the project participants quality assurance programs were discussed. Because the DOE is unable to staff with experienced personnel, they are planning to depend heavily on contractors for control of QA programs. The inability of the Chief of Quality Assurance Systems Branch to fill open positions was discussed at length. The bottom line is he cannot establish a high enough grade level to permit recruiting of the experience he needs.

This is a serious matter that exists at each of the projects. NRC experience on nuclear plant projects has proven that utilities which were overdependent upon contractors had significant QA problems. The DOE is forced into dependency upon contractors because the civil service system prevents them from staffing with experienced personnel. This matter must be addressed and resolved by DOE at the highest level.

B607110439 B60505
PDR WASTE PDR
WM-10

WM Record File

101

WM Project 10

Docket No. _____

PDR

LPDR

Distribution: _____

(Return to WM, 623-SS)

1874

The benefits of having NRC conduct mini-audits of discrete work packages, which are complete or near complete, in the next few months were discussed. the Chief of Quality Assurance Systems Branch stated that such audits could be beneficial to the project. I advised that NRC was formally requesting DOE Headquarters to consider such audits.

The Chief of Quality Assurance Systems Branch was officially acting for the Project Manager who was away from the office. I observed that while filling that position he could no longer be considered "independent" in the QA position. Bob Cook had also observed this situation and mentioned his observation in our exit discussion with Mr. Lawrence.

The need to revise the NRC Review Plan to ensure better understanding for earth science work was discussed. The Chief of Quality Assurance Systems Branch stated that any exceptions to the Review Plan taken by BWIP were reflected in their QA Program Plan which is awaiting DOE Headquarters approval. NRC will not be able to comment on the BWIP QA plan until Headquarters has approved the plan.

The NRC on-site senior licensing representative and I met with M. J. Lawrence, E. S. Goldberg, D. K. Jones, and J. N. Anttonen at the conclusion of my visit to brief them on the discussions. All of the items above were discussed with them. We devoted more time to the subject of staffing and the impact if this situation continues. Mr. Lawrence was well aware of their inability to attract experienced personnel under the civil service system but doesn't have a clear path to resolve it. He did indicate he would take it up with Mr. Rusche.

Mr. Lawrence was supportive of the mini-audit concept.

"ORIGINAL SIGNED BY"

Dale Hedges
Repository Projects Branch
Division of Waste Management

Record Note: This report was reviewed with Bob Cook by phone

OFC	:WMP:rs	:	:	:	:	:	:
NAME	:DHedges	:	:	:	:	:	:
DATE	:06/5/86	:	:	:	:	:	:
