

July 21, 2004

Mr. Robert Brient, Director  
Quality Assurance  
Center for Nuclear Waste Regulatory Analyses  
6220 Culebra Road, Building 189  
San Antonio, TX 78238-5166

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF OBSERVATION OF THE  
FISCAL YEAR 2004 CENTER FOR NUCLEAR WASTE REGULATORY  
ANALYSES QUALITY ASSURANCE AUDIT 2004-1

Dear Mr. Brient:

On June 8-11, 2004, U.S. Nuclear Regulatory Commission (NRC) staff from the Office of Nuclear Material Safety and Safeguards observed the Fiscal Year 2004 Center for Nuclear Waste Regulatory Analyses (CNWRA) Quality Assurance (QA) Audit 2004-1. The CNWRA conducted this risk-informed, performance-based audit at its facilities in San Antonio, Texas.

The objectives of this CNWRA audit were to determine whether the CNWRA QA Program meets the contractual requirements of NRC-02-02-012, and if it is effectively implemented. The NRC staff observed the CNWRA audit to evaluate the adequacy of the CNWRA audit process and the effectiveness of the CNWRA QA Program implementation in meeting the contractual requirements of NRC-02-02-012. Observation Audit Report (OAR) Number OAR-04-03-CNWRA (enclosed) provides NRC staff's audit observations and conclusions.

The CNWRA auditors noted several good practices during the audit but also identified eight nonconformances with the requirements of CNWRA QA Program implementing procedures. The auditors concluded that the nonconformances identified during the audit did not affect the quality of the activities reviewed or any technical products produced. The auditors identified 13 recommendations to improve various quality affecting processes and activities.

The NRC observers evaluated the adequacy of the CNWRA audit process and the effectiveness of the CNWRA QA Program implementation. The NRC observers determined that, overall, the audit team achieved the purpose of the CNWRA Audit 2004-1, and the team was thorough, effective, and performed in a professional manner. The observers agreed with the auditors' findings and concluded that, overall, the CNWRA QA Program controls are being adequately implemented in the areas that were evaluated, except for the identified nonconformances. However, the number of nonconformances identified by the auditors is higher than what had been identified during the last three CNWRA annual internal QA audits. The nonconformances identified by the auditors could generally be attributed to inattention to detail. Therefore, it is recommended that CNWRA place additional emphasis in this area. It is also recommended that CNWRA consider the NRC observers' comments listed in Section 10, "NRC Staff Findings," in the enclosed OAR for future audits.

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We will continue to monitor the CNWRA progress in addressing the nonconformances identified by the auditors and any actions needed to improve the QA program implementation and effectiveness. Although a written response to this letter or the enclosed report is not required, we request that the CNWRA provide us with copies of its response to the auditors' findings. If you have any questions, please call Thomas Matula at (301) 415-6700.

Sincerely,

***/RA/***

Deborah A. DeMarco  
NRC CNWRA Deputy Program Manager  
Division of High-Level Waste Repository Safety  
Office of Nuclear Material Safety  
and Safeguards

Enclosure:

NRC OAR No. OAR-04-03-CNWRA, "U.S. Nuclear Regulatory Commission Staff Observation of the Fiscal Year 2004 Center for Nuclear Waste Regulatory Analyses Quality Assurance Audit 2004-1"

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\*See previous concurrence

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