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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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March 6, 2000

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FROM: James L. Blaha  
Assistant for Operations, OEDO

*Debbie Corley for DOE*

SUBJECT: STAFF OBSERVATION FROM RECENT DOE AUDITS OF OE TECHNICAL REPORTS

The following information is provided for your information.

Attachment: As stated

- cc: W. Travers, EDO (w/o attachment)
- C. Paperiello, DEDMRS (w/attachment)
- F. Miraglia, DEDR (w/o attachment)
- P. Norry, DEDM (w/attachment)
- J. Blaha, AO (w/attachment)
- G. Smith, OEDO (w/attachment)
- W. Reamer, NMSS (w/o attachment)

- SECY (w/attachment)
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- OPA (w/o attachment)
- EDO R/F (w/attachment)

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### Staff Observations from Recent DOE Audits of DOE Technical Reports

Recently, the staff submitted Items of Interest (IOIs) on Division of Waste Management staff's observation of the Department of Energy's (DOE's), Office of Quality Assurance audits of the Waste Form Process Model Report (PMR) and the Engineered Barrier System (EBS) Process Model Report (PMR). The DOE audits were conducted at the Yucca Mountain project office in Las Vegas, Nevada in January 2000, and included a number of Analysis Model Reports (AMRs) supporting the two PMRs. The IOIs described the scope of the technical reports reviewed, the status of DOE progress in qualifying data that will support site recommendation, and the principal conclusions of the DOE auditors. The staff has additional observations that follow:

As a result of the Waste Form PMR audit, the NRC observers concluded that: a) the AMR developers, within the scope of this audit, produced technically adequate AMRs; b) several significant changes to procedures controlling the AMR process are being implemented without the benefit of training or formal instruction; c) the process of communicating lessons learned from the audits to the preparers of the AMRs needs to be improved; and d) the AMR completion schedule, compounded by the complexity and constant revision of the procedures controlling the AMR process, may be impacting the AMR developer's ability to produce AMRs that meet the applicable administrative procedure requirements.

As a result of the EBS PMR audit, the NRC observers concluded that: a) the AMRs were technically adequate for their development stage; b) most software had been properly qualified; c) no data supporting the AMRs had been qualified; and d) the technical specialists on the DOE audit team were weak in their understanding of audit practices and conveying their findings on the effectiveness of the AMR quality.

The staff is concerned about the lack of data qualification activities for the AMRs reviewed during the audit and the five previous audits. Neither the NRC observation team nor the DOE OQA has been provided an opportunity to assess the data qualification process.

The staff is preparing a memorandum for the Commission, updating the staff's September 17, 1999 status report on the DOE's corrective action program. The staff expects to submit the memorandum by April. The staff has informally communicated the foregoing observations, in general terms, to DOE senior management.