

DG/M.MATTHEWS/11/9

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NOV 15 1989

Mr. Mark Matthews, Acting Project Manager
Uranium Mill Tailings Project Office
Albuquerque Operations Office
U.S. Department of Energy
P.O. Box 5400
Albuquerque, NM 87115

Dear Mr. Matthews:

Enclosed are our remaining comments pertinent to your Revision 2 of the UMTRA Project Quality Assurance Plan, July 1989. An advance copy of these comments was provided to you during our recent meeting on November 1, 1989. As discussed during that meeting, once you have had a chance to look over this enclosure, we will set up a meeting to discuss the comments and plans for NRC's accompaniment on future audits.

If you have any questions regarding this review, please feel free to contact me or Dan Gillen of my staff (FTS 492-0517).

Sincerely,

(SIGNED) PAUL H. LOHAUS

Paul H. Lohaus, Chief
Operations Branch
Division of Low-Level Waste Management
and Decommissioning, NMSS

Enclosure: As stated

cc: Sally Mann, DOE Hq.
Chuck Cormier, DOE Alb.

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SUBJECT ABSTRACT: REVIEW OF REVISION 2 OF UMTRA PROJECT QUALITY ASSURANCE PLAN

OFC : LLOB <i>DMG</i>	: LLOB <i>MF</i>	: LLOB <i>PK</i>	: LLWM	: LLWM	: NMSS
NAME: DGillen/jj	: MFliegel	: PLOhaus	:	:	:
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COMMENTS ON UMTRA-DOE/AL 185, REVISION 2

UMTRA PROJECT QUALITY ASSURANCE PLAN

Basis for Review

The UMTRA Project Quality Assurance Plan was reviewed against 10 CFR 50 Appendix B and ANSI/ASME NQA-1.

Comments

1. DOE has not adequately responded to the General Comment addressed on May 15, 1989. In summary, it is still not clear what DOE is responsible for. Questions 3 thru 23 provide some additional detailed comments expanding on the May 15, 1989 General Comment.
2. The DOE response to NRC's questions, May 19, 1989, about the DOE QA Plan did not adequately address questions 6, 7c, 9, 12b and 14.
3. Page 6, Subsection 1.3.1; DOE/AL

This section states that the DOE/UMTRA-PO discharges its QA responsibilities with the assistance and advice of the TAC, by such activities as the following:

- a. Participation in design reviews and QA audits.
- b. Reviewing and approving of test plans and QA procedures.
- c. Providing QA surveillance and policy guidance.
- d. Reviewing and approving of QAPP's prepared by organizations participating in the Project.

In 1.3.1a above it is stated that the DOE/UMTRA-PO participates in design reviews. In 1.3.2 it is stated that the DOE/UMTRA Project Manager approves design criteria, conceptual design, and final design. It is suggested that the responsibilities for achieving and assuring the quality of the remedial action task activities be clearly stated in Section 1.0 Organization. Those same responsibilities should be consistently threaded through the rest of the QA plan.

In 1.3.1b above it is stated that the DOE/UMTRA-PO approves test plans and QA procedures. Who or what part of the Project office approves plans and procedures? Who generates the plans and procedures to be approved - DOE and/or contractors? In 1.3.1c above it is stated that the

DOE/UMTRA-PO provides QA surveillance and policy guidance. This statement does not describe the control that must be exercised by the Project Office and further is inconsistent with statements later in the document which indicate the Project Office controls audits of contractors.

4. Page 6, Subsection 1.3.2; UMTRA Project Manager

The responsibilities of the DOE Project Manager and his staff are not described. Subsection 1.3.2, states only that the Project Manager administers the Project and is assisted by Project Engineers.

5. Page 5, Subsection 1.2.6; The DOE/AL Project Quality Assurance Manager

In subsection 1.2.6; it is stated that the Project Quality Assurance Manager supervises and directs the QA activities of the TAC and RAC. In subsection 1.4.3, it is stated that the RAC Quality manager has authority to stop work. Since the Project QAM does not have authority to stop work and directs the RAC Quality manager, how does the subordinate gain this authority? How does this authority to stop work vested in the RAC Quality manager relate to the statement in subsection 1.8, that states the overall authority to stop work on all levels of the UMTRA Project rests solely with the DOE Contracting Officer?

6. Page 17, Section 2.0; Quality Assurance Program

Much of Section 2, Quality Assurance Program is written as a restatement of requirements rather than stating what is being done by what part of the DOE Project Organization.

An example, 2.2.9, states organizational managers will periodically assess the effectiveness of those portions of the QA program for which they are responsible. The term "organizational manager" is not used in Section 1 to describe the DOE organization nor has the DOE organization been broken down to include manager titles.

7. Page 24, Section 3.2.5; Readiness Review for Design Activities

Readiness reviews are discussed in 3.2.5, with no indication of what the participation is by the DOE Project office. The same is true for 3.2.6, Design Verification and 3.2.7, Design Charge Control.

8. Page 25, Section 3.2.8, Design Error and Design Deficiency Control

it is stated in 3.2.8, that errors and deficiencies in approved design documents generated by the DOE/UMTRA Project Office will be controlled and resolved in accordance with Section 16. Section 16, Corrective Action,

states that provisions for reporting conditions adverse to quality are addressed in project contractor QAPP's. How are project Office generated deficiencies resolved by contractors? What is the responsibility of the Project office for deficiencies generated within DOE?

9. Page 26, Section 4.0; Procurement Document Control

It is not clear whether DOE will procure materials and services from the information provided in Section 4, Procurement Document Control. Doe responsibilities for contractor procurements are also not addresses.

10. Page 28, Section 5.0; Instructions, Procedures and Drawing

DOE/UMTRA Project Office responsibilities are not defined for the preparation and approval of Project Office procedures. A listing of DOE procedures needs to be provided to further assess the effectiveness of the DOE management systems.

11. Page 29, Section 6.0; Document Control

DOE/UMTRA Project office responsibilities are not specified for Project Office controlled documents.

12. Page 31, Section 7; Control of Purchases Materials, Equipment and Services

This is adequate providing DOE-AL or DOE/UMTRA Project Office does not purchase any materials or services and does not enter into the contractors process for procurements in any way.

13. Page 34, Section 8; Identification and Control of Materials, Parts, and Components

This section is adequate.

14. Page 35, Section 9; Control of Special Processes

This section is adequate.

15. Page 36, Section 10; Inspection

This section is adequate.

16. Page 37, Section 11; Test Control

This section is adequate.

17. Page 38, Section 12; Control of Measuring and Test Equipment

This section is adequate.

18. Page 39, Section 12; Control of Measuring and Test Equipment

This section is adequate.

19. Page 40, Section 14; Inspection, Test, and Operating Status

This section is adequate.

20. Page 41, Section 15; Control of Nonconforming Items

This section is adequate.

21. Page 42, Section 16; Corrective Action

DOE/UMTRA Project Office organization responsibilities are not defined for corrective actions for which the Project Office is responsible.

22. Page 43, Section 17; Quality Assurance Records

DOE/UMTRA Project Office responsibilities are not defined for retention and retrieval of records produced by the Project Office.

23. Page 45, Section 18; Audits

This section is adequate.