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A Division of Southwest Research Institute 6220 Culebra Road • San Antonio, Texas, U.S.A. 78228-5166 (210) 522-5160 • Fax (210) 522-5155

October 25, 1999 Contract No. NRC-02-97-009 Account No. 20,01402,761

U.S. Nuclear Regulatory Commission ATTN: Mr. James Firth Two White Flint North 11545 Rockville Pike Mail Stop T8A23 Washington, DC 20555

Subject:

QA Task Force Report on LLNL DOE Audit

Milestone AI 20.1402.761.014

Dear Mr. Firth:

The enclosed report is being submitted as the hard copy version of the QA Task Force Report on the Lawrence Livermore Department of Energy Audit performed the week of September 13-17, 1999. An electronic version of this report was earlier submitted to Mr. Jack Spraul for use as in the NRC QA Task Force activities. This submittal fulfills the Administrative Item 20.01402.761.014.

If you have any questions regarding this report, please contact Bruce Mabrito at (210) 522-5149. Your cooperation in this matter is appreciated.

Sincerely.

Gordon Wittmeyer

Manager

Performance Assessment

NH15

/mp

Enclosures

cc:

J. Linehan

D. DeMarco

W. Patrick

B. Stiltenpole

J. Spraul

CNWRA Directors

B. Meehan J. Greeves

L. Campbell

CNWRA Element Mgrs

J. Holonich

T. Carter

T. Nagy (SwRI Contracts)

W. Reamer

K. Hooks

K. McConnell

R. Codell

K. Stablein



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HIGH-LEVEL WASTE QUALITY ASSURANCE TASK FORCE SUMMARY OF ACTIVITIES SEPTEMBER 13-17, 1999 U.S. DEPARTMENT OF ENERGY AUDIT AT LAWRENCE LIVERMORE NATIONAL LABORATORY

During the week of September 13-17, 1999, members of the Division of High-Level Waste Management's Quality Assurance (QA) Task Force, John G. Spraul and Thomas C. Trbovich (representing the Center for Nuclear Waste Regulatory Analyses), observed the U.S. Department of Energy (DOE) Office of Civilian Radioactive Waste Management (OCRWM) audit of the Yucca Mountain Site Characterization Office (YMSCO) Management and Operating Contractor (M&O). The audit took place at the Lawrence Livermore National Laboratory (LLNL) in Livermore, California. The audit was the annual DOE compliance audit to evaluate the implementation, adequacy, and effectiveness of LLNL's activities supporting YMSCO. In addition, the audit team reviewed the status of previous deficiency documents to determine the effectiveness of completed corrective actions as well as the status of LLNL corrective actions initiated over the past year.

Other observers of the audit were:

Albert C. Williams

OCRWM Office of Quality Assurance (OQA)

Edward P. Opelski

OQA Contractor - Quality Assurance Technical Support Services

(QATSS)

The DOE audit team was comprised of the following personnel:

Michael A. Goyda

OQA/QATSS (Audit Team Leader)

Mario R. Diaz

OQA

Kristi A. Hodges

OQA/QATSS

Victor J. Barish Floyd H. Dove OQA/QATSS OQA/QATSS

An audit checklist, covering the QA program elements applicable to LLNL, was developed by the audit team prior to the audit. These QA program elements were Organization, Quality Assurance, Procurement Document Control, Implementing Documents, Document Control, Control of Purchased Items and Services, Control of Measuring and Test Equipment, Nonconformances, Corrective Action, QA Records, Software, Sample Control, Scientific Investigation, Control of the Electronic Management of Data, and Mined Geologic Disposal System. A copy of the checklist was provided to the observers at the opening meeting, and the checklist was used by the audit team members during the audit.

LLNL personnel who were interviewed during the week included, inter alios:

Barbara Alegre

Records Coordinator

William Bourcier

Principal Investigator (PI)

Barbara Campbell Bill Clark Technical Area Leader (TAL) - Licensing Support

TAL - Engineered Barrier System Materials & LLNL Repository Advisory Committee Member

John Estill

Laboratory Supervisor

William Glassley

Pl

Martha Kohler

CRWMS LLNL Manager

Wunan Lin

TAL - Integrated Near Field Environment & PI

Royce Monks Steve Steward

Engineering Assurance Manager

PI

Ray Stout TAL - Waste Form and Waste Package Internals

Although there were no significant conditions adverse to quality noted during the audit, the audit team rated the implementation of two of the applicable QA program elements as unsatisfactory as shown in the table below:

QA PROGRAM ELEMENT	AUDIT TEAM CONCERNS
Implementing Documents	 The electronic version of documents did not always agree with the hard copy The revision number noted on the front page of the electronic version of procedures was not "carried through" the entire procedure. Surveillances required by LLNL Technical Implementing Procedures did not reflect current organizations and processes.
QA Records	 Records were corrected/changed by unidentified personnel. Changed records sent to the Records Processing Center in Las Vegas did not reflect the accession number of the record being changed.

The audit team also noted several concerns in other QA elements. These were either corrected during the audit or will be shown as recommendations in the audit report. The other QA program elements were rated as satisfactory.

The audit team was thorough and persistent in evaluating the QA program elements and pursuing discrepant conditions. The concerns expressed by the audit team generally related to activities that were completed prior to the all-hands QA training and the DOE/M&O emphasis on changing to a nuclear culture that occurred about mid-way through the audited period.

The NRC QA Task Force observers noted improvements and corrections in the active LLNL scientific notebooks. The same individuals observed the LLNL scientific notebook review activities of the DOE QA team during their last visit. The latest entries were in compliance with procedural requirements. Observation of and interviews with Charlie Warren, OQA's on-site QA representative at LLNL, indicate that his efforts are strengthening LLNL's QA program implementation. Interviews of LLNL personnel showed them to be more knowledgeable of QA requirements than during the LLNL scientific notebook review. LLNL management is closely monitoring corrective actions to ensure timely completion. Based on these facts and the lack of significant findings during the audit, the NRC QA Task Force observers believe that LLNL personnel are improving significantly in the areas of procedure adherence, attention to detail, and timely corrective measures in line with a nuclear culture.

ABBREVIATIONS

CRWMS Civilian Radioactive Waste Management Systems

DOE U.S. Department of Energy

LLNL Lawrence Livermore National Laboratory
M&O Management and Operating Contractor

OCRWM Office of Civilian Radioactive Waste Management

OQA Office of Quality Assurance, OCRWM

PI Principal Investigator, LLNL

QA Quality Assurance

QATSS Quality Assurance Technical Support Services

TAL Technical Area Leader, LLNL

YMSCO Yucca Mountain Site Characterization Office

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