

June 2, 2000

MEMORANDUM TO: C. William Reamer, Chief
High-Level Waste and Performance
Assessment Branch, DWM/NMSS

FROM: Kenneth R. Hooks, Senior Project Manager */RA/*
Projects and EIS Section
Uranium Recovery and Low Level Waste
Branch, DWM/NMSS

SUBJECT: HIGH-LEVEL WASTE QUALITY ASSURANCE
OBSERVATION ACTIVITIES

Attached for your information is a summary of the assessment by the U.S. Nuclear Regulatory Commission, Office of Nuclear Material Safety and Safeguards, High-Level Waste Quality Assurance Task Force observer of the U.S. Department of Energy's (DOE's) compliance-based audit of Sandia National Laboratories (SNL) implementation of the Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance (QA) program. The audit of SNL's activities for the Yucca Mountain High-Level Waste Program was performed by the DOE's Office of Quality Assurance (OQA) using an independent team of experienced personnel.

The NRC observer witnessed aspects of DOE's audit activities performed during May 22-24, 2000, at SNL's offices in Albuquerque, New Mexico. The purpose of the audit was to assess implementation, adequacy, and effectiveness, of SNL's QA program. The scope of the audit included eight of the eighteen elements of the QA program as described in the OCRWM Quality Assurance Requirements and Description (QARD) document, and five associated supplements and appendices of the QARD.

As a result of this audit, the OQA auditors concluded that the SNL QA program is adequate and is being effectively implemented. The NRC observer agrees with this conclusion. One deficiency was identified, in the area of training, but the deficiency had no effect on the deliverables produced by SNL. A recommendation identified during this audit was that SNL review its technical procedures to determine if some are no longer needed and can be cancelled.

Contact: Kenneth R. Hooks, NMSS/DWM/URLL
(301) 415-7777

Attachment: As stated

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QUALITY ASSURANCE OBSERVATION
SUMMARY OF ACTIVITIES MAY 22-24, 2000
U.S. DEPARTMENT OF ENERGY COMPLIANCE-BASED AUDIT
OF SANDIA NATIONAL LABORATORIES

During May 22-24, 2000, a member of the Division of Waste Management (DWM), High-Level Waste Quality Assurance Task Force, observed various aspects of the U.S. Department of Energy (DOE), Office of Civilian Radioactive Waste Management (OCRWM), Audit SNL-ARC-00-12 of Sandia National Laboratories (SNL). This audit evaluated activities since the previous compliance-based audit of SNL in August 1999. The audit was performed by DOE's Office of Quality Assurance (OQA) in order to evaluate the implementation, adequacy, and effectiveness of SNL's implementation of OCRWM's QA program as described in the Quality Assurance Requirements and Description (QARD) document and implementing procedures.

The OQA Audit team was comprised of the following personnel:

William J. Glasser	Team Leader	OQA/Quality Assurance Technical Support Services (QATSS)
Victor J. Barish, Jr.	Audit Team Leader in Training	OQA/QATSS
James Blaylock	Team Member	OQA/QATSS

The NRC observer was:

Kenneth R. Hooks	Senior Project Manager	NMSS/DWM/URLL
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BACKGROUND

An annual compliance-based audit of SNL's implementation of the Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance Program, as described in the QARD and implementing procedures, is required by the QARD. This audit is in addition to any performance-based QA audits performed since the last compliance-based audit.

AUDIT RESULTS

The audit team evaluated eight of the eighteen elements, and five supplements and appendices of the QARD being implemented by SNL. The team worked from a detailed checklist based on the QARD, OCRWM procedures used by SNL, and procedures specific to SNL activities. Specific areas evaluated by the Audit Team and overviewed by the NRC observer included: understanding of SNL managers and staff of SNL's organization and QA requirements; a sampling of personnel records to compare education, experience, and training with position descriptions/job requirements; review of scientific notebooks; and entering, controlled distribution, and use of electronic copies of documents as the record copy.

At the present time, most of SNL's efforts are direct support to OCRWM's Management and Operating Contractor (M&O), performed under the direction of M&O personnel, using mainly

M&O procedures. SNL had not performed any quality-related procurement activities since the last compliance-based audit. No open deficiencies were identified for which SNL had primary responsibility.

AUDIT TEAM'S CONCLUSIONS

The Audit Team determined that SNL activities related to ten of the thirteen QARD elements, supplements, and appendices assessed were satisfactory, and three had not been implemented and therefore could not be evaluated. One deficiency was identified, concerning the lack of Training it was determined by the Audit Team that despite the lack of TA's, necessary training had been accomplished and there was no negative effect on SNL deliverables. One finding was closed during the audit, concerning a missing official transcript in one of the four personnel record folders reviewed. A recommendation was made by the Audit Team that SNL personnel review technical procedures specific to SNL and determine if selected procedures can be cancelled since they are no longer needed or used.

NRC OBSERVER CONCLUSIONS

The NRC staff observer concluded that: 1) the OQA Audit Team team was well prepared and demonstrated a thorough understanding of the requirements of the QARD and the various implementing procedures used by SNL; 2) the audit checklist was appropriately detailed, and effectively used to guide the audit; and 3) the Audit Team performed a thorough evaluation of the selected elements of the SNL QA program. The NRC observer agreed with the conclusions reached by the Audit Team that the QA program is adequate and that the adequacy of SNL's QA program implementation was appropriately supported by objective evidence.