

United States Government

Department of Energy

memorandum

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DATE: AUG 6 1985
REPLY TO: RW-23
ATTN OF:
SUBJECT: Quarterly Report of QA Status
TO: William Purcell, RW-20
Thru: Ralph Stein, RW-23 *R*

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WM Record File

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WM Project 1

Docket No.

PDR ✓

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Attached is a report of the progress and current status of quality assurance activities in OGR as required by Section VI.C of the OGR QA Plan. In summary, we are on schedule to have the next set of OGR QA procedures issued by the end of August 1985, initial planning is being performed for initiation of QA training and internal audits within OGR, and the process of auditing the repository project offices and analyzing the project office audits of their contractors is in full operation.

A summary of the audits OGR conducted on the project offices, and of the audits conducted by our projects of their contractors for the period October '84 - May '85 is included in the attached report. To date ten such audits have been conducted resulting in a total of 28 findings. From this small amount of data, no trends could be established. The majority of the audits in FY-85 are to be conducted during the last quarter.

We would be happy to brief you on this report or to answer any questions you may have.

CR Head

Charles R. Head, Acting Leader
Licensing and QA Team

Attachment: QA Status Report - July 1985

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QA STATUS REPORT - JULY 1985

	<u>Date</u>
1. <u>Issue Additional HQ Quality Implementing Procedures</u>	
A. HQ review of project QA Plans and Administrative Procedures QIP 2.0	Draft 4/8/85* Final 7/26/85
B. Indoctrination and Training QIP 2.1	Draft 4/2/85* Final 8/16/85
C. Peer Reviews QIP 3.1	Draft 6/21/85* Final 8/6/85
D. Document Control QIP 6.0	Draft 6/10/85* Final 8/2/85
E. Significant Problem Reporting and Corrective Action QIP 16.0	Draft 4/8/85* Final 7/26/85
F. QA Records QIP 17.0	Draft 6/10/85* Final 7/29/85
G. Headquarters Review of Project Submitted Audit Reports QIP 18.2	Draft 4/8/85* Final 8/9/85
H. Internal Audits QIP 18.4	Draft 4/8/85* Final 7/26/85
I. Procurement Document Control QIP 4.0	Draft 8/30/85 Final 11/15/85
2. <u>Target Schedule for Initiation of OGR QA Indoctrination and Training Program</u>	
A. Draft procedure issued for comment	04/02/85*
B. Final procedure issued	8/16/85
C. First training session conducted	9/13/85
D. QA auditor training course (in-house or outside)	12/31/85
3. <u>Target Schedule for Conduct Internal OGR QA Audits</u>	
A. Send notification letter	1/20/86
B. Prepare check list	2/1/86
C. Conduct audit	2/20/86

* Denotes Action complete

- D. Audit report issued 3/20/86
- E. Corrective action review 5/20/86
- F. Notification of acceptability of corrective action 7/15/86

4. Audit Project Offices

A. NNWSI

1. Audit Activities

- o audit notification letter 2/5/85*
- o prepare audit check list 02/19/85*
- o conduct NNWSI audit 3/4-7/85*
- o issue audit report 3/27/85*
- o evaluate corrective action responses 7/1/85*
- o notify NNWSI of acceptability of corrective action response 7/29/85

2. Summary of Audit

Findings

- o Management controls are not documented between project and most participating organizations.
- o WMPO has not documented and established a Records Management System.
- o QA program does not describe provisions for the resolution of disputes involving quality or define a PQM position.
- o Audit Team Leader on the LANL and SNL audit was not certified to the requirements of NQA-1.

Observations

- o Copies of the five OGR baseline documents were not readily available in branch chief offices nor were they familiar with them.
- o Initial proficiency evaluation for WMPO personnel were not in the QA files.
- o WMPO does not, to a reasonable representative degree, perform audits of representative subcontractors, consultants or vendors.

- o WMPO QA plan does not adequately describe how the yearly management assessment of the QA Program is performed.
- o Internal audits have been scheduled but have not commenced.

B. BWIP

1. Audit Activities

- o audit notification letter 2/5/85*
- o prepare audit check list 4/5/85*
- o conduct BWIP audit 5/20-23/85*
- o issue audit report 6/20/85*
- o evaluate corrective action responses 8/5/85
- o notify BWIP of acceptability of corrective action responses. 8/19/85

2. Summary of Audit

Findings

- o The project has not issued procedures covering Stop Work, Nonconformances, Corrective Action, Indoctrination and Training, Management Assessment, Peer Review, Document Control, Surveillance, Design Control, Procurement Document Control, Document Review, and QA Records. (Procedures must be in place before site characterization activities can commence.)
- o The project has not audited representative subcontractors, consultants, vendors and laboratories.
- o Audit findings have not been tracked, analyzed for trends or closed out.
- o Organizational responsibilities for reviewing, approving and verifying designs are not specified in project documents nor is QA involvement given.
- o Procurement document review by QA personnel has not been performed.
- o Project requirements for review and concurrence with contractors procedures for safety related items or activities are not defined.
- o Items important to safety and waste isolation have not been identified.

Observations

- o A management position that retains overall authority and responsibility for the QA program has not been identified within the project.
- o Additional clarity should be provided for implementation of management controls and establishing effective communications channels.

C. SRPO

1. Audit Activities

- o audit notification letter 2/5/85*
- o prepare audit check list 5/31/85*
- o conduct SRPO audit 7/8-11/85*
- o issue audit report 7/19/85*
- o evaluate corrective action responses 9/24/85
- o notify SRPO of acceptability of corrective action response 10/8/85

2. Summary of Audit

Findings

- o Performance requirements are not specified for repository system components as required by the NRC Review Plan. Also, the items which are important to waste isolation have not been identified nor has a graded approach to QA been established.
- o The required QA reviews are not required by the SRPO QAPs and are not being performed by SRPO.
- o The procedure for documenting and controlling non-conformances does not meet the requirements of the NRC QA Review Plan and is not effectively implemented. The procedure for corrective action, likewise, neither meets the requirements nor is being effectively implemented.
- o SRPO has not implemented a QA Records System that meets the requirements of the NRC QA Review Plan.
- o The SRPO auditing program does not meet the requirements of the NRC QA review Plan and of NQA-1.
- o The SRPO QA Program does not include a commitment for the control of computer programs and procedures describing the controls have not been provided.

- o The SRPO QA Program does not require the assessments to be made by management above or outside the QA organization. There is no evidence that management assessments have been made by individuals above or outside the QA organization.
- o The indoctrination, training and qualification programs required by the NRC QA Review Plan have not been established.
- o The SRPO QA Program does not describe the involvement of the QA Organization in supplier selection and bid evaluation.

Observations

- o In reviewing the Battelle contract and modifications and the Parsons-Redpath contract and modifications, evidence that reviews of procurement documents had been performed was not always available in the files of the chief of contracts and administration. In addition, the evidence of approvals, when available, was inconsistent in format.
- o The SRPO does not have an audit tracking system. Audit tracking is performed by ONWI, but documentation of the results is not routinely provided to the SRPO.

Also, no trending has been performed to date.

D. CRPO

1. Audit Activities

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| o audit notification letter | 8/05/85 |
| o prepare audit check list | 8/30/85 |
| o conduct CRPO audit | 9/17/85 |
| o issue audit report | 10/15/85 |
| o evaluate corrective action responses | 12/10/85 |
| o notify CRPO of acceptability of corrective action response | 1/15/86 |

2. Summary of Audit

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5. Participate in Project Audits of Contractors

- | | |
|--|----------|
| A. Prepare master schedule | 2/15/85* |
| B. Make assignments to OGR auditors | 3/1/85* |
| C. Participate in audit of TBEG by SRPO | 4/17/85* |
| D. Participate in audit of Kaiser (desk) by BWIP | 4/29/85* |

E.	Participate in audit of Rockwell (Field) by BWIP	5/85**
F.	Participate in audit of Morris/Knudson by BWIP	6/85**
G.	Participate in audit of Flour by SRPO	6/11/85*
H.	Participate in audit of Kaiser/Oakland by BWIP	6/85**
I.	Participate in audit of LLNL by WMPO	7/08/85
J.	Participate in audit of Rockwell by BWIP	7/85
K.	Participate in audit of ONWI by SRPO	8/6/85
L.	Participate in audit of Parsons-Redpath by SRPO	8/27/85
M.	Participate in audit of SNL by WMPO	8/05/86
N.	Participate in audit of H & N by WMPO	8/12/85
O.	participate in audit of F & S by WMPO	8/26/85
P.	Participate in audit of LANL by WMPO	9/03/85
Q.	Participate in audit of Battelle PNL by SRPO	9/16/85
R.	Participate in audit of SAIC by WMPO	9/23/85
S.	Participate in audit of LLNL by SRPO	9/30/85
T.	Participate in audit of USGS Denver by WMPO	9/17/85
U.	Participate in audit of USGS Menlo Park by WMPO	9/23/85
V.	Participate in audit of REECO by WMPO	9/10/85

6. Analyze Project Audit Reports (Oct. 84 through May 85)

A. Audit Reports transmitted to DOE-HQ

1.	BWIP	2
2.	NNWSI	3
3.	SRPO	5
4.	CRPO	<u>0</u>
	Totals	10

* Completed

** Postponed - To Be Rescheduled

B. Audits Scheduled

1.	BWIP	4
2.	NNWSI	6
3.	SRPO	10
4.	CRPO	<u>1</u>
	Totals	21

C. Summary of Results

<u>Auditor</u>	<u>Auditee</u>	<u>Date</u>	<u>Find.</u>	<u>Obs.</u>
SRPO	ONWI	10/29/84	1	1
DOE/CH	SRPO	12/11-13/84	3	5
SRPO	Bendix	1/16-18/85	1	2
SRPO	Pacific Northwest Lab	4/2-4/85	0	0
BWIP	Pacific Northwest Lab	4/2-4/85	7	2
NNWSI	WMPO	4/10-11/85	3	7
SRPO	Texas BEG	4/17-18/85	2	1
BWIP	RKE/PB	4/29-5/1/85	7	1
NNWSI	WMPO	5/1-2/85	3	2
NNWSI	WMPO	5/8-9/85	<u>1</u>	<u>3</u>
	Totals		28	24

D. Breakdown of Findings/Observations

<u>Category</u>	<u>Find</u>	<u>Obs.</u>
Organization	2	1
Training/QA Program	6	2
Design/Peer Review	2	2
Procurement Activities	4	3
Procedures	1	4
Document Control	1	0
Identification & Control	1	0
Inspection	1	5
Calibration	1	0
Nonconformances	3	1
Records	3	3
Audits	<u>3</u>	<u>3</u>
Totals	28	24

E. Analysis of Reports

- o From the small amount of data presented no trends could be established.
- o A majority of the audits scheduled for FY85 (45) have been delayed until the last quarter.

- o WMPO is reviewing all contractors QA Plans which is causing their audit delays. BWIP has QA personnel shortages, which will likely cause further delays; efforts are being concentrated on development of internal procedures.

7. Target Schedule for Issuance of Program Wide Policy Guidance

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|--|----------|
| A. Issue important to safety (Q-list) methodology. | 7/31/85* |
| B. Issue QA Handbook for Geologic Investigations. | 8/15/85 |
| C. Issue program wide QA requirements. | TBD |
| 1. Qualification of personnel | TBD |
| 2. Computer software control | TBD |
| 3. Control of measuring and test equipment | TBD |
| 4. QA records | TBD |
| 5. Reliability of existing data | TBD |
| 6. Peer reviews | TBD |
| 7. QA for research and development | TBD |
| 8. Oversight of field activities | TBD |
| 9. Significant problem reporting | TBD |

8. Target Schedule for Resolution of NRC QA Concerns

- | | |
|---|----------|
| A. Input from projects on NRC issues raised during December 84 site visits. | 3/29/85* |
| B. Proposed DOE position on independence of QA position. | 8/15/85 |
| C. Proposed DOE position on dependence on contractors. | 8/15/85 |
| D. Proposed DOE position on graded QA. | 8/15/85 |
| E. Proposed DOE position on qualifying historical data. | 8/15/85 |
| F. Proposed DOE position on readiness reviews. | 8/15/85 |
| G. Proposed DOE position on NNWSI control of participants. | TBD |
| H. Proposed DOE position on USGS matrix management approach. | TBD |

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|-----|---|-------------|
| I. | Follow-up meeting with NRC. | TBD |
| 9. | <u>Target Schedule for Completion of SCP QA Input</u> | |
| A. | Guidance to project QA managers (check list) | 5/15/85* |
| B. | Meeting among project participants to discuss issues | 7/30/85 |
| C. | Final guidance | 8/30/85 |
| 10. | <u>Conduct QACG Meetings</u> | |
| A. | Issue agenda for July '85 meeting | 6/28/85* |
| B. | Conduct July meeting | 7/30-8/1/85 |
| C. | Distribute meeting minutes | 8/16/85 |
| D. | Issue agenda for Oct '85 meeting | 9/30/85 |
| E. | Conduct Oct. meeting | 10/29-31/85 |
| F. | Distribute meeting minutes | 11/15/85 |