



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 4, 2000

Mr. Dwight Shelor, Acting Director
Program Management and Administration
Office of Civilian Radioactive Waste Management
U. S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION'S OBSERVATION AUDIT
REPORT NO. OAR- 00-03, "OBSERVATION AUDIT OF OFFICE OF THE
CIVILIAN RADIOACTIVE WASTE MANAGEMENT, QUALITY ASSURANCE
DIVISION, AUDIT NO. M&O-ARP-00-002"

Dear Mr. Shelor:

I am transmitting the U.S. Nuclear Regulatory Commission's (NRC's) Observation Audit Report No. OAR-00-03 of the U.S. Department of Energy (DOE), Office of Civilian Radioactive Waste Management (OCRWM), Office of Quality Assurance (OQA), Yucca Mountain Quality Assurance Division (YMQAD), audit of the Biosphere Process Model Report (PMR) activities performed by the OCRWM Management and Operating Contractor (M&O). The audit, M&O-ARP-00-002, was conducted on November 15-19, 1999, at the M&O facilities in Las Vegas, Nevada.

This audit was limited in scope and evaluated the effectiveness of the implementation of the OCRWM QA Program described in the Quality Assurance Requirements and Description (QARD) and its implementing procedures for selected analysis model reports (AMRs) supporting the Biosphere PMR.

The NRC staff determined that this audit was effective in identifying deficiencies and recommending improvements in the AMR process. During the conduct of the audit, both the audit team and the NRC observers reviewed data, analysis reports, and software within the scope of the audit to confirm that it was properly qualified. The NRC observers determined that: a) the software supporting the AMRs had been properly qualified; and b) certain data categorized as "accepted data" were determined to be controlled in accordance with established procedures and properly categorized as "accepted data."

The NRC staff generally agrees with the audit team conclusions, findings, and recommendations. However, as noted in Section 4.7 of this report, the NRC staff expressed a concern about the adequacy of the process controlling the preparation and use of procedures for the AMR process. Further, as discussed in various sections of this report, the NRC staff is concerned about the lack of data qualification activities for the AMRs reviewed during this audit and the two previous audits. Accordingly, this condition appears to be a condition requiring DOE's management attention.

As discussed in Section 4.7.1 of the attached report, the NRC observers generated two audit observer inquiries (AOIs) questioning the process used for the validation of analysis and models, and concerning documenting the resolution of a reviewer's comments. Also, we would

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like to point out that we have not received a response to an AOI, dated September 22, 1999, which addressed the qualification status and use of the waste stream profiles.

A written response to this letter and the enclosed report is not required. However, we do expect OQA to provide replies to the open AOIs. If you have any questions, please contact Larry L. Campbell of my staff at (301) 415-5000.

Sincerely,

King Stablein

C. William Reamer, Chief
High-Level Waste and Performance
Assessment Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure: NRC Observation Audit Report No. OAR-00-03, "Observation Audit of the Office of Civilian Radioactive Waste Management, Quality Assurance Division, Audit No. M&O-ARP-00-002"

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