



**Department of Energy**  
**Yucca Mountain Site Characterization**  
**Project Office**  
**P. O. Box 98608**  
**Las Vegas, NV 89193-8608**

WBS 1.2.11  
 QA: N/A

SEP 30 1993

Julie A. Canepa  
 Technical Project Officer  
 for Yucca Mountain  
 Site Characterization Project  
 Los Alamos National Laboratory  
 University of California  
 EES-13, Mail Stop J521  
 P.O. Box 1663  
 Los Alamos, NM 87545

EVALUATION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-93-049  
 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT  
 YMP-93-11 OF LOS ALAMOS NATIONAL LABORATORY (SCP: N/A)

The YMQAD staff has evaluated the amended response to CAR YM-93-049. The amended response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this date must be requested in writing, with appropriate justification, prior to the date. Please send a copy of extension requests to Nita J. Brogan, YMQAD/QATSS, 101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109.

If you have any questions, please contact either Robert B. Constable at (702) 794-7945 or James Blaylock at (702) 794-7913.

Richard E. Spence, Director  
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-6241

Enclosure:  
 CAR YM-93-049

- cc w/encl:
- J. B. Tillman, LAAO
  - J. H. Hines, OQD, AL
  - K. R. Hooks, NRC, Washington, DC
  - S. W. Zimmerman, NWPO, Carson City, NV
  - N. Z. Elkins, LANL, Las Vegas, NV
  - S. L. Bolivar, LANL, Los Alamos, NM
  - J. C. de la Garza, YMP, NV

- cc w/o encl:
- J. W. Gilray, NRC, Las Vegas, NV
  - N. J. Brogan, YMQAD/QATSS, Las Vegas, NV

*1027 W  
 WM-11  
 N403*

*ADD: Ken Hooks W/ Encl.  
 1 1*

**OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.**

8 CAR NO.: YM-93-049  
DATE: June 02, 1993  
SHEET: 1 OF 1  
QA

**CORRECTIVE ACTION REQUEST**

1 Controlling Document TWS-QAS-QP-01.1, R2	2 Related Report No. Audit Report YMP-93-11
-----------------------------------------------	------------------------------------------------

3 Responsible Organization Los Alamos Nat. Lab	4 Discussed With S. Bolivar, M. Clevenger
---------------------------------------------------	----------------------------------------------

5 Requirement:  
Procedure TWS-QAS-QP-01.1, R2, "Interface Control Procedure", requires in sections 6.1 and 6.2 that interfaces be identified and controlled and that an Interface Description Form be completed. Section 6.3 requires that interfaces between Los Alamos and other Project Participants be described and documented in accordance with YMP AP-5.19Q.

6 Adverse Condition:  
The following interfaces have not been controlled and documented in accordance with the procedural requirements of TWS-QAS-QP-01.1, R2:

- \* IMOU Los Alamos/USGS (no number) consummated by letters rather than through the mechanisms described in AP-5.19Q. The letters referenced are:  

Los Alamos to USGS, dtd. 7/09/90  
USGS to Los Alamos, dtd. 9/07/90
- \* Interface Description Form (IDF) initiated between USGS/Los Alamos for WBS 1.2.3.3.1.2.2 but never completed
- \* WBS Element 1.2.3.2.5 is an activity involving USGS, Los Alamos, and T&MSS for which no IDF could be produced.

9 Does a significant condition adverse to quality exist? Yes ___ No <u>X</u> If Yes, Circle One: A B C	10 Does a stop work condition exist? Yes ___ No <u>X</u> ; if Yes - Attach copy of SWO If Yes, Circle One: A B C D	11 Response Due Date: June 30, 1993
-----------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------	----------------------------------------

12 Required Actions:  Remedial  Extent of Deficiency  Preclude Recurrence  Root Cause Determination

13 Recommended Actions:

1. Conduct investigative action to determine all interfaces subject to this procedure.
2. Complete the identification and documentation for the Los Alamos/USGS interface associated with WBS 1.2.3.3.1.2.2.
3. Document all interfaces identified in item 1. in accordance with the procedure.
4. Take action to preclude recurrence.

7 Initiator <i>James Blaylock</i> James Blaylock Date <u>6/3/93</u>	14 Issuance Approved by: QADD <i>[Signature]</i> Date <u>6/8/93</u>
------------------------------------------------------------------------------	---------------------------------------------------------------------------

15 Response Accepted QAR Date	16 Response Accepted QADD Date
-------------------------------------	--------------------------------------

17 Amended Response Accepted QAR <i>James Blaylock</i> Date <u>9/21/93</u>	18 Amended Response Accepted QADD <i>[Signature]</i> Date <u>7/28/93</u>
----------------------------------------------------------------------------------	--------------------------------------------------------------------------------

19 Corrective Actions Verified QAR Date	20 Closure Approved by QADD Date
-----------------------------------------------	----------------------------------------

OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

CAR NO.	YMP-93-049
DATE:	06/29/93
PAGE:	1 OF
	QA

**CORRECTIVE ACTION REQUEST (Continuation Page)**

**A. Remedial Actions:**  
None required.

For the first bullet in Block 6:

There is no letter from Los Alamos to USGS dated 07/09/90 that references an IMOU.

Sample and date transfers involving the Hydrogenic Deposits Study between Los Alamos and USGS was documented on the following documents:

1. Los Alamos YMP Interface Description Form signed by R. Herbst, Los Alamos TPO, 07/20/90.
2. Los Alamos YMP Memorandum of Understanding signed by R. Herbst, Los Alamos TPO, 07/20/90, and L. Hayes, USGS TPO, 08/30/90.
3. YMP Interface Identification/Memorandum of Understanding signed by R. Herbst, Los Alamos TPO, 07/20/90, and L. Hayes, USGS TPO, 08/30/90.

These documents were transmitted to R. Herbst from L. Hayes via USGS letter on 09/07/90. Documents 1-3 above consummated the agreement in accordance with AP5-19Q, not the transmittal letter.

For the second bullet in Block 6:

Los Alamos YMP Interface Description Form for WBS 1.2.3.3.1.2.2 signed by K. West for R. Herbst, Los Alamos TPO, 07/09/91 was never implemented or transmitted to anyone. It was submitted as a project record as required by TWS-QAS-QP-01.1, R2. No instructions are provided for this procedure for further processing of this document, therefore, no noncompliance or adverse condition exists.

For the third bullet in Block 6:

There is no adverse condition. Many Work Breakdown Structure (WBS) activities are shared by various Project participants, which is indicated in the WBS Dictionary.

**B. Investigative Actions:**

1. Work performed by the Los Alamos Staff was reviewed to determine where interfaces require control in accordance with TWS-QAS-QP-01.1. No other interfaces exist other than the

OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

CAR NO. YMP-93-049  
DATE: 06/29/93  
PAGE: 2 OF  
QA

**CORRECTIVE ACTION REQUEST (Continuation Page)**

one identified by the first bullet in Block 6 of this CAR.

**Responsible Individual:**

Quality Assurance Liaison for EES/13.

**Actual Completion Date:**

June 30, 1993

**C. Corrective Action to Preclude Recurrence:**

None required. No adverse condition exists because there is no procedural noncompliance stated in this CAR.

Response Approved:

  
S. L. Bolivar, LANL QAPL

Date: 06/29/93



**Department of Energy**  
Yucca Mountain Site Characterization  
Project Office  
P. O. Box 98608  
Las Vegas, NV 89193-8608

WBS 1.2.11  
QA: N/A

JUL 14 1993

Julie A. Canepa  
Technical Project Officer  
for Yucca Mountain  
Site Characterization Project  
Los Alamos National Laboratory  
University of California  
EES-13, Mail Stop J521  
P.O. Box 1663  
Los Alamos, NM 87545

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-93-049  
RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT  
YMP-93-11 OF LOS ALAMOS NATIONAL LABORATORY (LOS ALAMOS) (SCP: N/A)

The YMQAD staff has evaluated the response to CAR YM-93-049. The response has been determined to be unsatisfactory for the following reasons:

- A. Remedial Action: Remedial action is required. Los Alamos' interpretation of the facts associated with the identified interfaces is at variance with procedural requirements.

The U.S. Geological Survey (USGS)/Los Alamos interface for the Hydrogenic Deposits activity (no work breakdown structure [WBS] given) was consummated directly between the Technical Project Officers. This approach is at variance with procedural direction (TWS-QAS-QP-01.1, Revision 2) which specifies that Administrative Procedure 5.19Q, is the governing procedure. Two specific results of this noncompliance are that the Interface Control Working Group Representative was not involved and that this interface did not receive an interface control number.

The documentation supporting the identification and control of the USGS/Los Alamos interface associated with WBS 1.2.3.3.1.2.2 remains incomplete. The available documentation indicates that this interface is viable and current. Los Alamos must comply with the procedure requirements or eliminate the interface.

- B. Investigative Action: Los Alamos' response with regard to investigative action makes the assertion that no other interfaces exist. In the absence of any specific detail as to a course of proposed action, no evaluation as to appropriateness and acceptability is possible. Please describe the course of action used to make the assertion.

JUL 14 1993

Julie A. Canepa

-2-

- C. Corrective Action to Preclude Recurrence: Although it is possible that investigative action may reveal that action to preclude recurrence is not necessary, it will not be due to the fact that there is no procedural noncompliance. Again, please propose a course of action for evaluation.

An amended response is required to be submitted to this office within ten working days of the date of this letter. Send the original of your response to Nita J. Brogan, Quality Assurance Technical Support Services, 101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109. If an extension to the due date is necessary, it must be requested in writing, with appropriate justification, prior to that date.

If you have any questions, please contact either Robert B. Constable at (702) 794-7945 or James Blaylock at (702) 794-7913.



Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-5021

Enclosure:  
CAR YM-93-049

cc w/encl:

J. B. Tillman, LAAO  
J. H. Hines, OQD, AL  
K. R. Hooks, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
N. Z. Elkins, LANL, Las Vegas, NV  
S. L. Bolivar, LANL, Los Alamos, NM

cc w/o encl:

J. W. Gilray, NRC, Las Vegas, NV  
N. J. Brogan, QATSS, Las Vegas, NV

OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

CAR NO. YM-93-049  
DATE: \_\_\_\_\_  
PAGE: \_\_\_\_\_ OF \_\_\_\_\_  
QA

**CORRECTIVE ACTION REQUEST (Continuation Page)**

**AMENDED RESPONSE TO CAR YMP-93-049, 07/27/93**

**A. Remedial Actions:**

1. The necessary paperwork will be initiated to eliminate the USGS/Los Alamos interface associated with WBS 1.2.3.3.1.2.2.

**B. Investigative Actions:**

1. The omission of an interface control number and lack of involvement of the Interface Control Working Group Representative associated with the USGS/Los Alamos interface for the Hydrogenic Deposits activity will be evaluated to determine the potential effect on the quality of the work performed. If it is determined that there is an effect on quality, Los Alamos YMP will conduct an investigation to evaluate other interfaces that are governed by TWS-QAS-QP-01.1. If there was no effect on the quality of the work performed, no further investigative action will be conducted.

**Responsible Individual:**

Quality Assurance Liaison for EES/13

**Actual Completion Date:**

August 31, 1993

**C. Corrective Action to Preclude Recurrence:**

TWS-QAS-QP-01.1 will be deleted and Los Alamos interfaces will be defined in other implementing procedures to meet the new QARD requirements.

**Responsible Individual:**

Quality Assurance Project Leader

**Actual Completion Date:**

August 31, 1993

Response Approved:

Michael D. Chavenger for 27 July 93  
S. L. Bolivar, LANL QAPL

Date: 07/27/93

OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

CAR NO. \_\_\_\_\_  
DATE: \_\_\_\_\_  
SHEET: \_\_\_\_\_ OF \_\_\_\_\_

**CORRECTIVE ACTION REQUEST**  
(continuation sheet)

**AMENDED RESPONSE TO CAR YMP-93-049, 08/26/93**

**A. Remedial Actions:**

1. The necessary paperwork will be initiated to eliminate the USGS/Los Alamos interface associated with WBS 1.2.3.3.1.2.2.

**B. Investigative Actions:**

1. A review was accomplished by the Verification Coordinator, through Los Alamos YMP survey LANL-SR-93-001, during August 04-20, 1993. No additional interfaces requiring an Interface Control Document were identified during the survey.

**Responsible Individual:**

Verification Coordinator

**Actual Completion Date:**

August 31, 1993

**C. Corrective Action to Preclude Recurrence:**

TWS-QAS-QP-1.1 will be deleted and Los Alamos interfaces will be defined in other implementing procedures to meet the new QARD requirements.

**Responsible Individual:**

Quality Assurance Project Leader

**Actual Completion Date:**

September 31, 1993

Response Approved:



S. L. Bolivar, LANL QAPL

Date: 08/26/93

*SLB dtd 8/26/93 - TWS-EES-13-08-93-032*