

ENCLOSURE 1

U. S. Nuclear Regulatory Commission/U. S. Department of Energy
Quarterly Quality Assurance
and
Key Technical Issues Status Meeting
Minutes

Las Vegas, Nevada
April 17, 2001

On April 17, 2001, the U.S. Department of Energy (DOE) and the U.S. Nuclear Regulatory Commission (NRC) conducted meetings on Quality Assurance (QA) and on Key Technical Issues (KTI) Status.

Quality Assurance

Model validation was discussed in some detail. Several Deficiency Reports regarding model validation have been issued recently and a Suspect Trend Identification Report is being prepared. It appears likely that a Corrective Action Request will be issued on this topic. The DOE believes the issue is primarily related to documentation of models. The NRC expressed concern that there may be a deeper underlying issue. The NRC asked if a revision to the Quality Assurance Requirements Document would be needed to help resolve the requirements, and DOE responded that such a revision might be needed.

The NRC expressed a strong interest in DOE plans to provide an evaluation of the impact of unqualified data and software as a part of the appropriate site recommendation (SR) supporting document submittal. Initially, this evaluation was planned to be included with the SR consideration report, which is no longer a part of the planned documents. DOE reiterated its commitment to provide an impact evaluation of any unqualified data and software supporting SR by the end of August 2001.

Software qualification was also discussed in some detail (including clarification on statistics). The raw reported numbers can be interpreted to indicate that completion has slipped backwards. DOE explained that changes in ongoing work changed the population of software. In some cases, this may make the percentage complete decrease despite the fact that work is being completed. DOE indicated that current plans are to close Deficiency Report LVMO-00-D-039 by September 18, 2001.

The NRC noted that it appeared that surveillance for the national laboratories and U.S. Geological Survey (USGS) were not being done. DOE indicated that due to limited resources, surveillance had decreased. However, it is planned in the future that surveillance of the national laboratories and USGS will increase.

Status of NRC Inspection Program

The NRC discussed the development of the Yucca Mountain Inspection Program and stated that NRC Region IV will be involved in the development and reviewing process.

The NRC also stated that the Yucca Mountain Inspection Manual Chapter and a few of the Inspection Procedures will be ready for issue within the fiscal year.

Key Technical Issues Status

Following the Quarterly QA Meeting, a breakout session was held on the status of the KTIs.

With regard to upcoming meetings, DOE indicated their goal for the Igneous Activities meeting was to bring as many issues as possible to closed or closed-pending. DOE also indicated that it was not clear why the NRC wanted a meeting on preclosure safety at this time.

The NRC indicated that they would provide a letter, on the record, outlining the preclosure safety areas it would expect DOE to discuss in any future license application. The NRC also indicated that the letter would identify several specific topics within these areas it would like DOE to discuss at the meeting. With regard to the Igneous Activity meeting, the NRC stated that they are primarily concerned with the Igneous Activity open items.

The NRC discussed the Microsoft Access database it uses to track agreements and the NRC's Open Item Tracking System (OITS), and indicated that all remaining issues in OITS have been closed or will be captured in KTI agreements. A report on the OITS will be issued shortly.

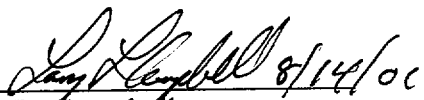
The NRC discussed a table showing the number of KTI agreements reached and their status. DOE requested a clarification to the table to indicate that open items are being resolved according to schedules agreed to with the NRC. The NRC discussed their review process of documents provided in support of the KTI agreements and indicated that it would formally document its review in letters to DOE. The NRC then discussed some KTI agreement issues that have been delayed and their current status.

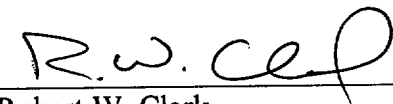
Regarding an integrated Issue Resolution Status Report (IRSR), the NRC will use the 14 integrated subissue (ISI) model abstractions discussed in the Total System Performance Assessment Integration (TSPAI) IRSR. Future issue resolution technical exchange and management meetings should use the ISI framework to ensure all the KTI subissues are integrated properly. The transition to ISI framework from the present KTI structure will be discussed in a future meeting. Use of ISIs would start in Fiscal Year (FY) 2002. The Yucca Mountain Review Plan will also follow the ISI approach.


DOE proposed an August meeting on use of ISIs to allow preparation of FY 2002 Budget Guidance for Bechtel SAIC Company, LLC based on their understanding of the NRC plans. The NRC indicated that their approach was not finalized, and the process would evolve through discussions with the stakeholders.

DOE also requested a meeting this summer on the Integrated IRSR. DOE also indicated that they would like to see stabilization of the acceptance criteria. The NRC indicated that they were moving toward five generic acceptance criteria, previously used in IRSRs.

DOE requested that a "meeting on meetings" be held to allow agreement on the mix of meetings over the next six months. The NRC indicated that an interaction on OITS should be first. The NRC indicated that the KTI process is working well and recognizes that DOE is working to address issues. The NRC also indicated that the ISI process is the next correct step in the KTI resolution process.


Larry L. Campbell
Division of Waste Management
Office of Nuclear Material
Safety and Safeguards
U.S. Nuclear Regulatory Commission


Robert W. Clark
Office of Civilian Radioactive
Waste Management
U.S. Department of Energy


April V. Gil
Office of Licensing and
Regulatory Compliance
Yucca Mountain Site
Characterization Office
U.S. Department of Energy

ENCLOSURE 2

**DOE/NRC Quarterly QA Meeting
Agenda**

April 17, 2001

9:00 AM – 11:30 AM PST / 12:00 AM – 2:30 PM EST / 11:00 AM - 1:30 PM CST

| | |
|---|--|
| DOE, 1551 Hillshire, Atrium, Las Vegas, NV 89134 | NRC White Flint O3B4, Rockville, MD |
| 490 L'Enfant Plaza, Washington, DC | SWRI (CNWRA) San Antonio, TX |

| | | |
|-----------------|--|----------------|
| 9:00 AM | Introduction | |
| 9:10 AM | Status of Model Validation | DOE |
| 9:20 AM | Progress Made in Qualifying Data | DOE |
| 9:35 AM | Progress Made in Qualifying Software | DOE |
| 10:05 AM | Corrective Action Status (including DR-039) | DOE |
| 10:30 AM | NRC Interfaces for Observing External Vendor Audits | NRC/DOE |
| 10:45 AM | Status of NRC Inspection Program | NRC |
| 11:00 AM | Results of the UZ and EBS PMR Audits | NRC/DOE |
| 11:30 AM | Adjourn | |

DOE/NRC KTI Status Breakout Session

Agenda

April 17, 2001

12:30 PM - 1:30 PM PST / 3:30 PM - 4:30 PM EST / 2:30 PM - 3:30 PM CST

| | |
|---|--|
| DOE, 1551 Hillshire, Atrium, Las Vegas, NV 89134 | NRC White Flint O3B4, Rockville, MD |
| 490 L'Enfant Plaza, Washington, DC | SWRI (CNWRA) San Antonio, TX |

| | | |
|-----------------|--|------------|
| 12:30 PM | Status of KTI Subissues | NRC |
| 12:40 PM | Status of KTI Agreements | NRC |
| 12:50 PM | NRC Review Process of Documents Received Pertaining to KTI Agreements | NRC |
| 1:00 PM | Plans for an Integrated IRSR, purpose, format and relationship with Sufficiency Review and YMRP | NRC |
| 1:15 PM | Lessons learned (RDTME) | DOE |
| 1:25 PM | NRC Chairman's response to Judy Treichel's letter | NRC |
| 1:30 PM | Adjourn | |

ENCLOSURE 3

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ATTENDEE SIGN-IN
NRC/DOE QA MEETING
APRIL 17, 2001

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ATTENDEE SIGN-IN
NRC/DOE QA MEETING
APRIL 17, 2001

| NAME | ORGANIZATION | PHONE NUMBER |
|-----------------|----------------------|--------------|
| E. TIEBENHAGEN | CARLE COUNTY | 702 455-5184 |
| Mal Murray | MTS | 794-5057 |
| Frank Kratzman | MTS | 794-5057 |
| Sam Horton | BSC OH | 295-0304 |
| Don Beckman | BSC Kansas | 295-4392 |
| George Hellsom | DOE YMSCO | 702-794-5519 |
| Jim GUNTER | DOE YMSCO | 702-794-1343 |
| David Hill | DOE YMSCO/DOE | 702 794-5578 |
| Bob Clark | DOE-ORR | 702 794 5583 |
| Bob Andrews | BSC - Project | 702 295 5549 |
| ROBERT WEMHAEER | BSC - PROJECTS-INTPI | 702-295-3966 |
| Bill Beck | NRC | 702-794-5047 |
| Bill Reimer | NRC | 381-415-6537 |
| Art Hays | NRC | 381-415-6612 |
| Rod McEllin | NRC | 202-739-8082 |
| K. M. Lamm | NRC | 702 794-5048 |
| John GEBHART | BSC OH | 702 295-6678 |
| Christy Bradley | Gen. John Emery | 702 388-6605 |
| John F. Peltier | BSC/SMID 19 | 702-443-2536 |
| S. J. CERRIGNO | BSC - LA Project | 702-295-4251 |

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APRIL 17, 2001

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From Rockville

(16)

April 17, 2001, QM MEETING

| | | |
|-----------------------|------------------|----------------|
| LARRY L. Campbell | USNRC | (301) 415-5000 |
| MANNY COMAR | USNRC | (301) 415-6074 |
| 160 CARTER | OSNRC | (301) 415-6694 |
| THOMAS MATYCA | USNRC | (301) 415-8563 |
| King Stabilein | USNRC | (301) 415-7445 |
| Jim Curtis | Winston & Strawn | (202) 371-5751 |
| Jim Andersen | USNRC | (301) 415-5717 |
| ROB MACDOUGALL | BSC/JKRA | 202-419-2122 |
| Bret Heslie | USNRC | (301) 415-6652 |

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ATTENDEE SIGN-IN
NRC/DOE QA MEETING
APRIL 17, 2001

From:
the Center
in San Antonio

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**KTI BREAKOUT SESSION
QUARTERLY MANAGEMENT MEETING
NRC HEADQUARTERS
APRIL 17, 2001**

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ATTENDEE SIGN-IN

NRC/DOE KTI STATUS BRIEFING MEETING

APRIL 17, 2001

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ATTENDEE SIGN-IN

NRC/DOE KTI STATUS BRIEFING MEETING

APRIL 17, 2001

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ATTENDEE SIGN-IN
NRC/DOE KTI STATUS BRIEFING MEETING
APRIL 17, 2001

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ENCLOSURE 4



U.S. Department of Energy
Office of Civilian Radioactive Waste Management

Model Validation Status

Presented to:
DOE/NRC Quarterly QA Meeting

Presented by:
Robert Andrews, Project Manager
Science and Analysis
Bechtel SAIC Company, LLC

April 17, 2001

**YUCCA
MOUNTAIN
PROJECT**

Outline

- **Background**
- **Historical Perspective**
- **Provide current information on model validation status**
- **Model validation documentation issues**
- **Summary of causes and path to resolution**
- **Summary**

Background: Models at YMP

- **Analysis Model Reports (AMRs)**
- **AMRs describe the development, testing, and use of models**
- **Model requirements, including validation, are procedurally controlled**

Historical Perspective

- **Prior to 1998, models and modeling were not explicitly procedurally controlled**
- **A Corrective Action Request (CAR) (LVMO-98-C-010) was initiated to place procedural controls on models and modeling**
- **AP-3.10Q was developed and implemented in 1999**
- **Initial products (AMRs) were produced using AP-3.10Q in 1999**
- **Audits performed in 1999 indicated deficiencies in implementation of AP-3.10Q with respect to the distinction between modeling and analysis**

Historical Perspective (cont.)

- **AP-3.10Q was revised and training conducted in early 2000**
- **AMR production continued with the completion of 122 AMRs**
- **Further audits indicated model validation was being inadequately documented and resulted in three DRs**
 - **DR-119**
 - **DR-007**
 - **DR-050**
- **In addition, a Suspect Trending Investigation Report (STIR) has been initiated (but results are not yet available from that investigation)**

Model Validation Documentation Issues

- **All issues identified to date are documentation related, not fundamental flaws in the modeling**
- **Documentation issues include:**
 - **Some AMRs have no single specific section of the report that contains consolidated model validation information (i.e., information spread across a number of sections) making it difficult to understand how validation was conducted**
 - **Some AMR validation discussion is unclear or lacking**
 - **Some model validations were based on methods that were not specifically recognized by the procedure**
 - **Some model validations are subjective and lack specific validation criteria**
 - **Some AMRs contain purely conceptual models which do not require validation**

Summary of Causes of Deficiencies

- **AP-3.10Q does not clearly describe the process of validation**
- **AP-3.10Q does not distinguish between validation of different types of models (conceptual, process, abstraction, system)**
- **Criteria for validation are unclear**

Path to Resolution

- **Revise Procedure AP-3.10Q**
 - focus will be entirely on models in scientific investigation
 - dedicated section on model validation will be required
- **Revise AMRs used to support the LA to assure adequate documentation of models**
- **Provide assistance in revising AMRs**
 - Training on details of requirements
 - Assistance teams to support AMR authors, review in process work and assure consistency

Conclusions

- **All model validation concerns identified to date involve documentation and not model suitability or results**
- **Improvements in process requirements and additional training are being planned for future AMRs**



U.S. Department of Energy
Office of Civilian Radioactive Waste Management

Data Qualification Status

Presented to:
NRC/DOE Quality Assurance Meeting

Presented by:
Dr. Robert F. Wemheuer
Integrated Management of Technical Product Input Department
Bechtel SAIC Company, LLC

April 17, 2001

**YUCCA
MOUNTAIN
PROJECT**

Post-Transition Organization

- **Bechtel SAIC Company, LLC (BSC) effected a seamless and smooth transition and assumption of data work**
- **BSC took a proactive role in facilitating the consolidation, integration, and coordination of data related activities including Document Input Reference System (DIRS), To Be Verified (TBV), Technical Document Management System (TDMS) input, and the administrative process groups by forming the Integrated Management of Technical Product Input Department (IMTPID)**
- **Core technical and administrative personnel demonstrating data qualification and technical data input processing history were retained**
- **Personnel are and will continue to be qualified and trained to the Quality Assurance Requirements Description (QARD)**

Responsibilities

- **BSC has chartered IMTPID with execution and control of the following functions:**
 - **DIRS**
 - **To Be Determined (TBD)/TBV management**
 - **Reference controls**
 - **Verification of input data**
 - **Qualification of input data**
 - **Technical Product Input (TPI) compliance**
 - **TPI integration, tracking, and status**
 - **Improvement of the data qualification processes**

Process Improvements

- **Focus responsibilities and accountabilities for the integrity and flow of TPIs**
- **Integrate AP-3.14Q and AP-3.15Q processes for TBD/TBV and DIRS**
- **Centralize the responsibility for assuring consistency of TPI usage, management, statistics, etc. across the project**
- **Improve communication and clarity of expectations and requirements through procedural efficiencies**

Mission Expectations

- **Reduced number of unnecessary TBD/TBVs, inventories, and time to resolve them**
- **Continued satisfaction of U. S. Department of Energy (DOE) and U. S. Nuclear Regulatory Commission (NRC) expectations of reproducibility of data qualification results and accuracy of reporting qualification status, as well as**
- **Maintain DOE and NRC confidence in our project TPI processes, controls and quality programs**
 - **The January 31, 2001 Technical Exchange explaining the data verification/qualification processes to NRC reviewers**

Qualification Objectives and Focus

- **Conduct verification and qualification activities for the data used in Analysis Model Reports (AMRs) that support the Site Recommendation (SR)**
- **Ensure the integrity of the verification and qualification processes and make continued process improvements**
- **Support Chief Information Office (CIO) on legacy (prior to 06/30/99) software qualification & documentation issues contained in pre-Process Validation and Reengineering (PVAR) data verification/qualification processes**
- **Overall objective is to assure the integrity, fidelity and confidence in data and process procedures that provide the foundation for the development of the SR and License Application (LA)**

Data Qualification Status by Process Model Report (PMR)

| PMR | 12/15/00 Percent Data Qualified | 12/15/00 Percent Data Verified | 03/31/01 Percent Data Qualified | 03/31/01 Percent Data Verified |
|-------------------|---------------------------------------|--------------------------------------|---------------------------------------|--------------------------------------|
| Biosphere | 89 | 100 | 94 | 100 |
| Disruptive Events | 92 | 100 | 91 | 100 |
| EBS | 82 | 93 | 87 | 100 |
| ISM | 74 | 93 | 83 | 100 |
| Near Field | 87 | 100 | 88 | 100 |
| SZ F&T | 80 | 100 | 81 | 91 |
| UZ F&T | 81 | 93 | 88 | 94 |
| Waste Form | 71 | 92 | 93 | 95 |
| Waste Package | 86 | 92 | 91 | 100 |
| Total | 81 | 94 | 88 | 96 |

**Percent completion for data figures are
based upon Data Tracking Numbers
(DTNs) contained in locked DIRS**

Verification/Qualification Status as of 3/31/01

| | <u>Total</u> | <u>Completed</u> | <u>Remaining</u> | |
|--|--------------|------------------|------------------|------------------------------|
| VL1 DIRS (Verif. Checklists) | 253 | 237 | 16 | (Q-TBV) ("actual citations") |
| VL1 Sources (Verif. Checklists) | 326 | 314 | 12 | (Q-TBV) ("daughters") |
| VL2 (No Verification Checklists) | 183 | 183 | 0 | (Q-TBV) |
| Accepted Data (Fact) | 83 | 83 | 0 | (e.g., handbooks, textbooks) |
| Accepted Data approved by Assistant Manager, Office of Project Execution | 45 | 31 | 14 | (e.g., journal articles) |
| Qualified by procedures established after 6/30/99 | 22 | 22 | 0 | |
| Unqualified DTNs | <u>309</u> | <u>243</u> | <u>66</u> | |
| Totals | 1221 | 1113 | 108 | |
| Percent of Total Data Citations | | 91% | 9% | |

Note: Document Input Reference System VL1+VL2+AP-SIII.2Q+Accepted (895) + Source VL1 (326) = Total Data Citations (1221)

VL1 = Principal Factor Related DTN

VL2 = Non-Principal Factor Related DTN

Data Confirmation Results as of 4/10/01

| <u>Organization</u> | <u>Completed Checklists</u> | <u>Verified Q</u> | <u>Verified UQ</u> | <u>Failure Rate**</u> |
|---|-----------------------------|-------------------|--------------------|-----------------------|
| USGS (U.S. Geological Survey) | 280 | 267 | 13 | 4.6% |
| LANL (Los Alamos National Laboratory) | 103 | 103 | 0 | 0% |
| LBNL (Lawrence Berkeley National Laboratory) | 5 | 4 | 1 | 20% |
| LLNL (Lawrence Livermore National Laboratory) | 33 | 33 | 0 | 0% |
| BSC* (Bechtel SAIC Company, LLC) | 53 | 51 | 2 | 3.8% |
| SNL (Sandia National Laboratories) | 79 | 78 | 1 | 1.3% |
| Total | 553 | 536 | 17 | 3.1% |

* Data generated by previous Yucca Mountain Site Characterization Project (YMP) organizations (i.e., Raytheon Services Nevada and Technical and Management Support Services) are now considered BSC data, and the results for these data are included in the BSC totals.

** Failure is defined as a determination that the data submitted under the associated DTN cannot be qualified. There are two principal causes for failure. Either the data acquisition/development process did not meet QARD requirements or data/record-related issues discovered during checklist preparation could not be resolved.

LBNL Challenge

- **LBNL DTNs are typically large and tend to be more complex by nature**
- **Traceability evaluation thoroughly traces data from raw records to the TDMS**
- **Approximately 60% of LBNL DTNs have over 5,000 rows of data**
- **DTN LB960500834244.001 (Hydrological Data, Permeability in ESF Area)**
 - **49 data tables**
 - **10,929 rows of data**
 - **more than 45 pieces of Measuring & Test Equipment (M&TE)**
 - **2 intermediate processing steps from raw records to final data**
 - **7 scientific notebooks**

Impact and Significance of Unqualified Data

- **Overall verification reject rate for Q-TBVs continues to be low ~ 3.1%**
- **Individual rejects are either qualified per AP-SIII.2Q, or replaced, having the authors rely on an alternative qualified data set(s), or only use the data as corroborative information**
- **Data and input management process controls are in place to evaluate specific impacts should any data sets fail the qualification process**

Challenges

- **Qualification production continues to be dependent upon early identification of new or additional unqualified data requiring qualification**
- **Due to policy and AMR changes for SR, fluctuations in scope of UQ- & Q-TBV DTNs requiring qualification are being experienced**
- **There continues to be complexity in the remaining unqualified DTNs resulting in greater than average processing time**
- **Despite the challenges, there is commitment by BSC, Labs, and USGS to improve integration of activities and timeliness of products to support data and qualification schedules**

Summary

- **The qualification of 100% of the data used to support AMR/PMR documents contained in the technical products baseline is on track for completion prior to SR submittal**
- **Based on current set of AMRs, efforts stand at:**
 - 96% of data verified
 - 88% of data qualified
- **Coordination and integration, between the authors, regulatory, qualification, and process groups has become increasingly more effective and is supported by BSC management**
- **New organization and integration of process functions will enhance overall coordination and performance**
- **Activities and schedules are being managed to support SR**

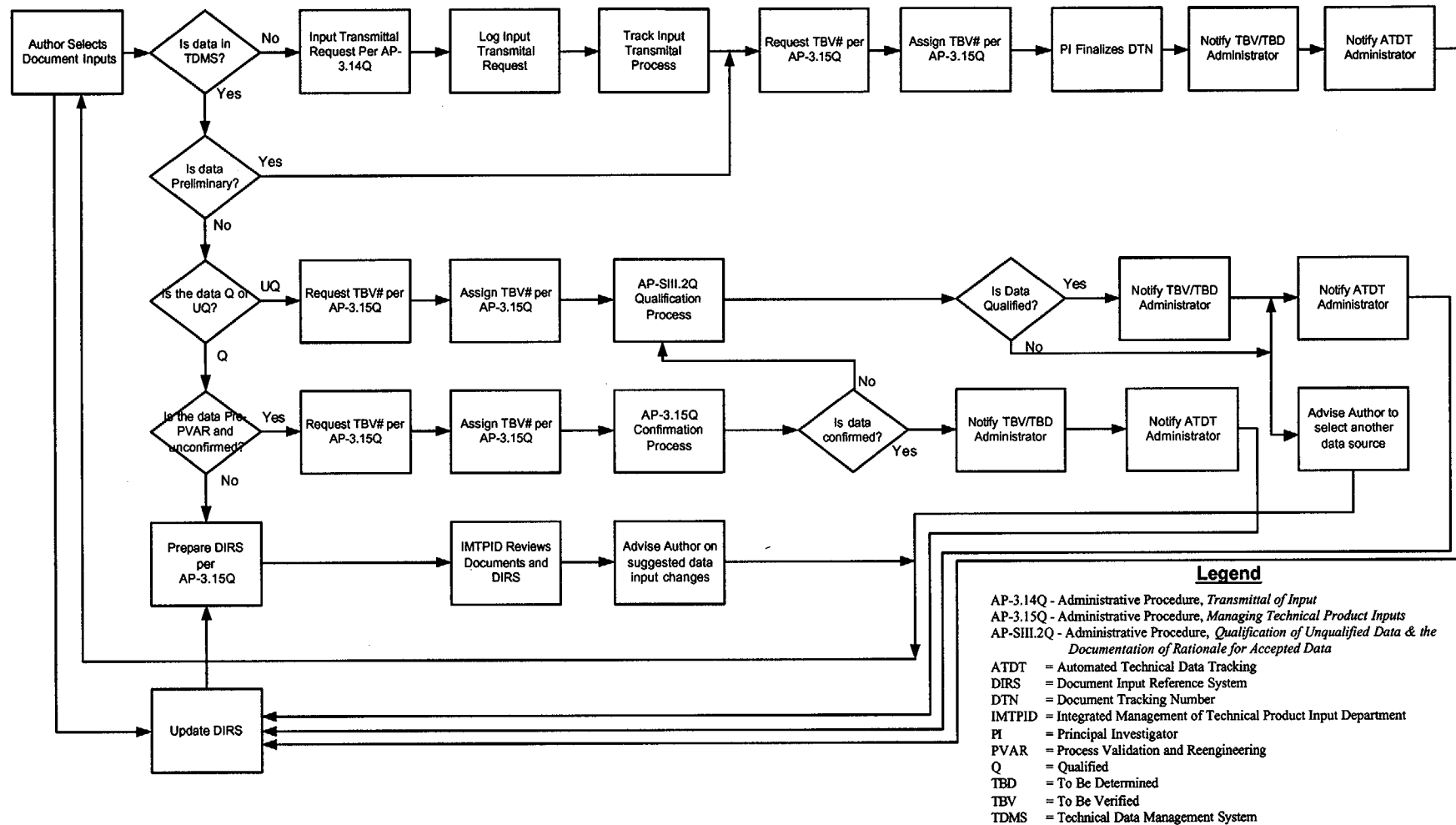
Backup



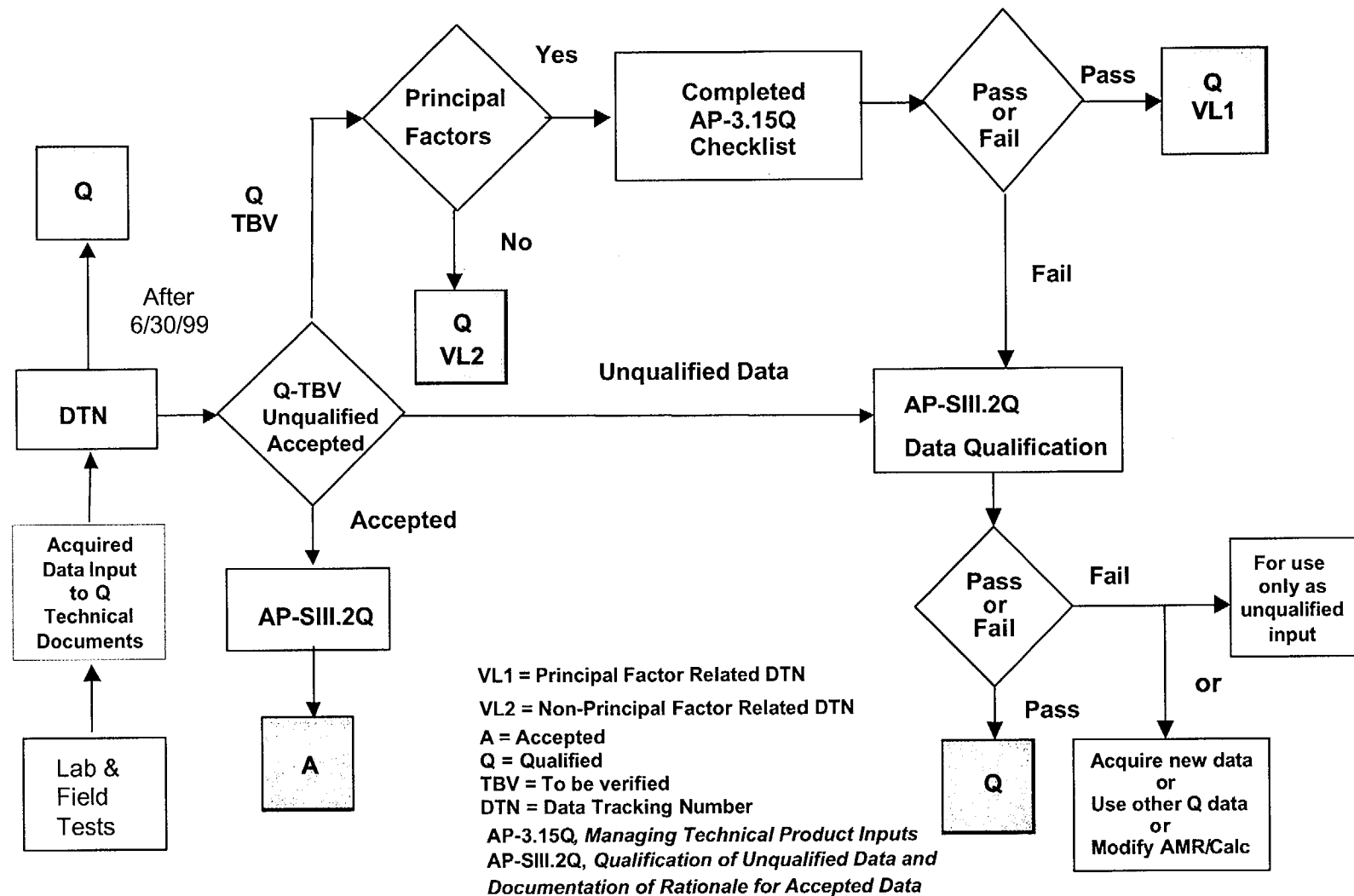
Key Process Procedures

- **Data Verification and Qualification activities are controlled by AP-2.21Q, *Quality Determinations and Planning for Scientific, Engineering, and Regulatory Compliance Activities***
- **Requests, control, receipt, and transmittal of inputs required to be from controlled sources are managed per AP-3.14Q, *Transmittal of Input***
- **Data verification checklists are prepared per AP-3.15Q, *Managing Technical Product Inputs***
- **Qualification activities affecting software are worked in concert with requirements in AP-SI.1Q, *Software Management***
- **Data qualification is performed per AP-SIII.2Q, *Qualification of Unqualified Data and Documentation of Rationale for Accepted Data***

Technical Product Input Process



Data Verification and Qualification Process





U.S. Department of Energy
Office of Civilian Radioactive Waste Management

Software Qualification Status

Presented to:

DOE/NRC Quarterly QA Meeting

Presented by:

John F. Pelletier

Information Compliance

Bechtel SAIC Company, LLC

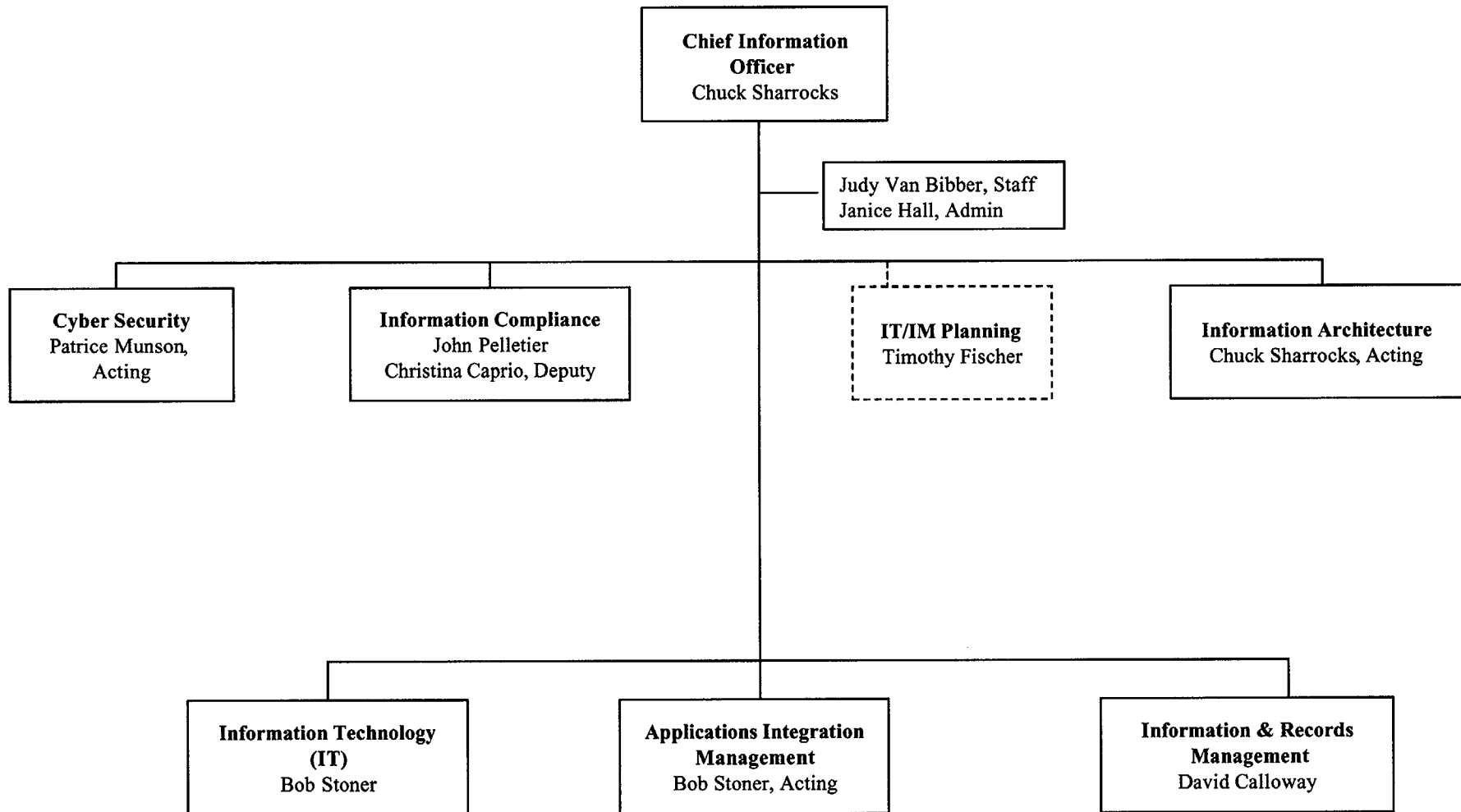
April 17, 2001

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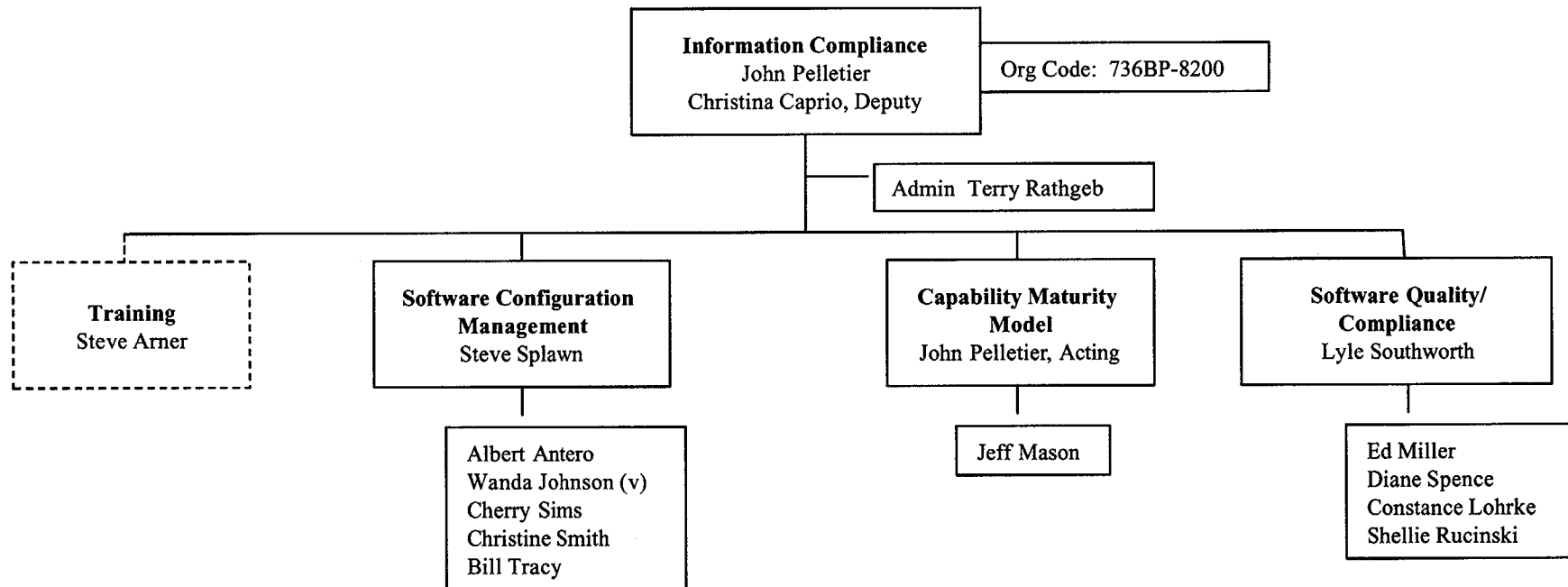
Software Topics

- **Organization**
- **AP-SI.1Q Revision**
- **Software Qualification Percentage by PMR**
- **Software Qualified by PMR**
- **Unique Unqualified Software Codes**
- **DR-039 on Software Routines**

New CIO Organization Effective 2/12/2001



New IC Organization Effective 2/12/2001



AP-SI.1Q Revision 3, ICN 0

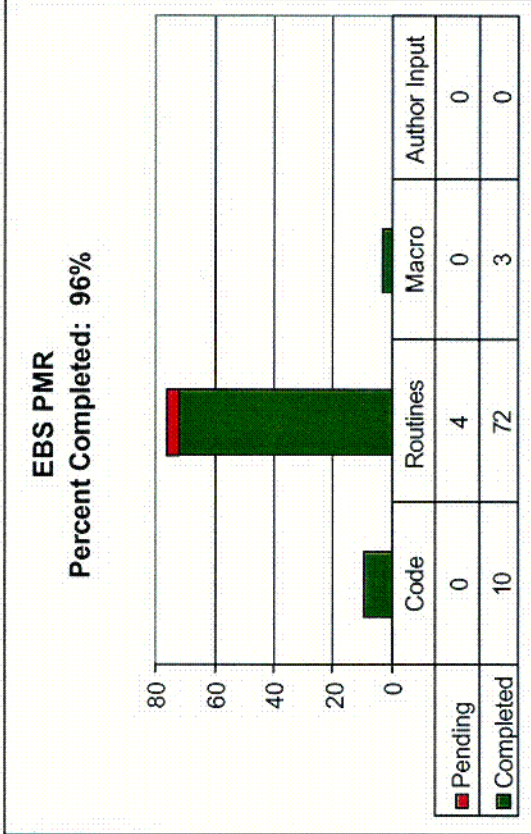
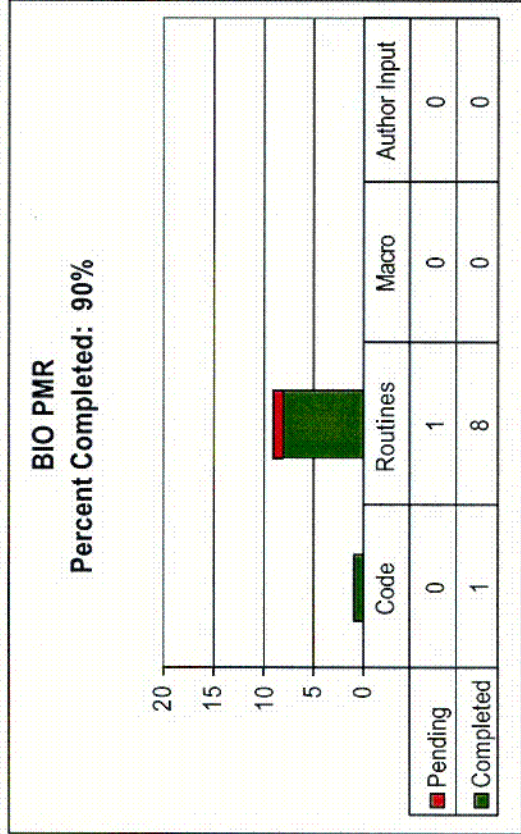
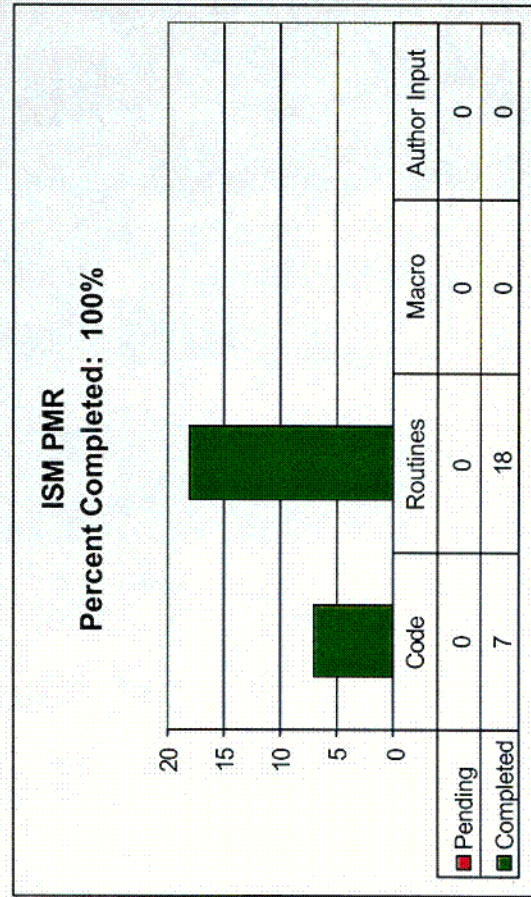
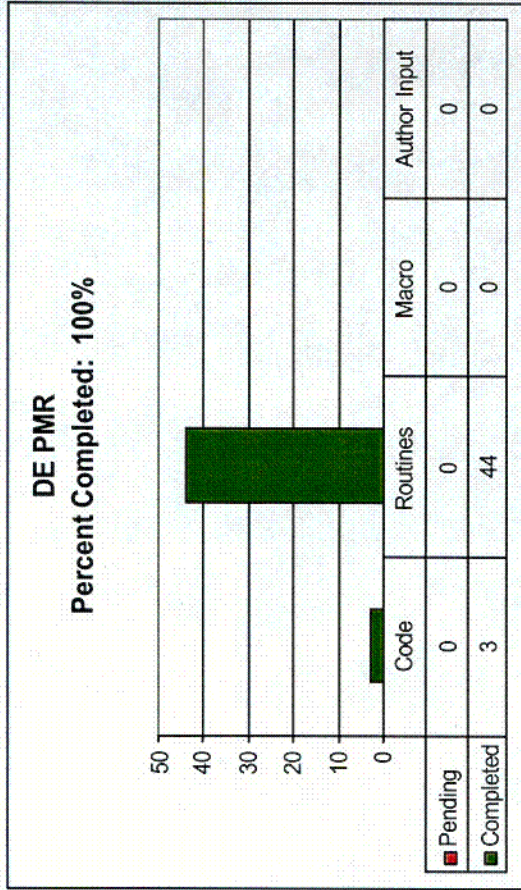
- **Improved process flow and rigor**
- **Provides for 3 levels of Software Classification**
- **Line Management Accountability**
- **Focused document Review and Testing**
- **Submission of Software Media with Baseline Documentation**
- **Documentation flow and approval has been streamlined**
- **Discontinued the use of Single Use Routines/Macro**
- **Effective Date 4/01/2001**

Software Qualification Percent By PMR

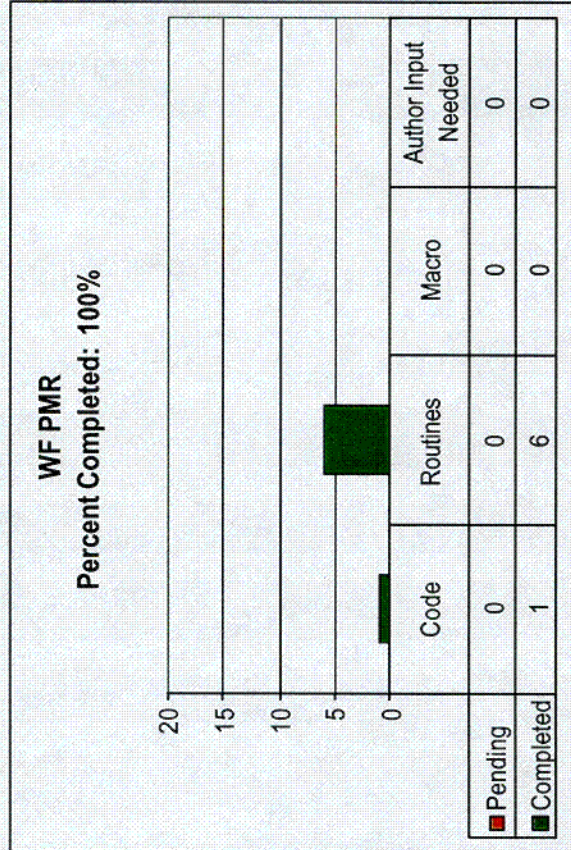
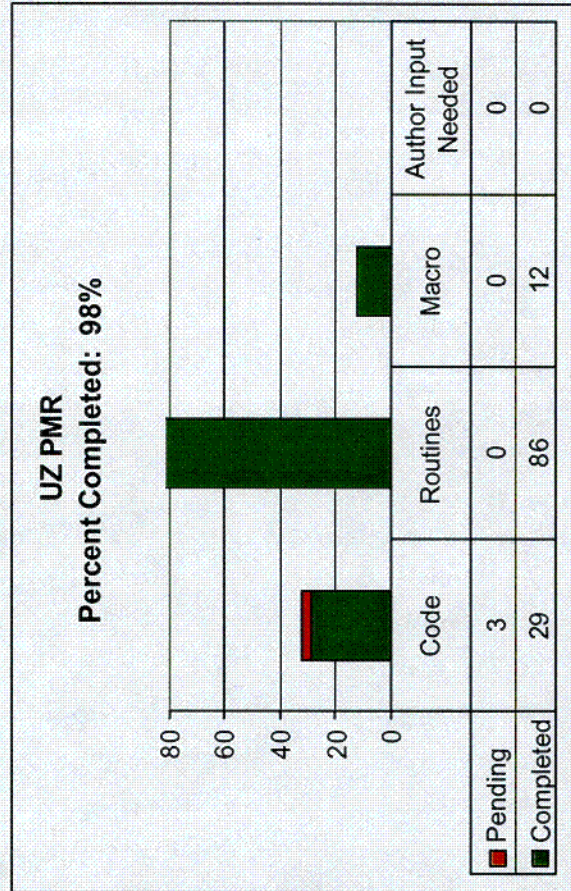
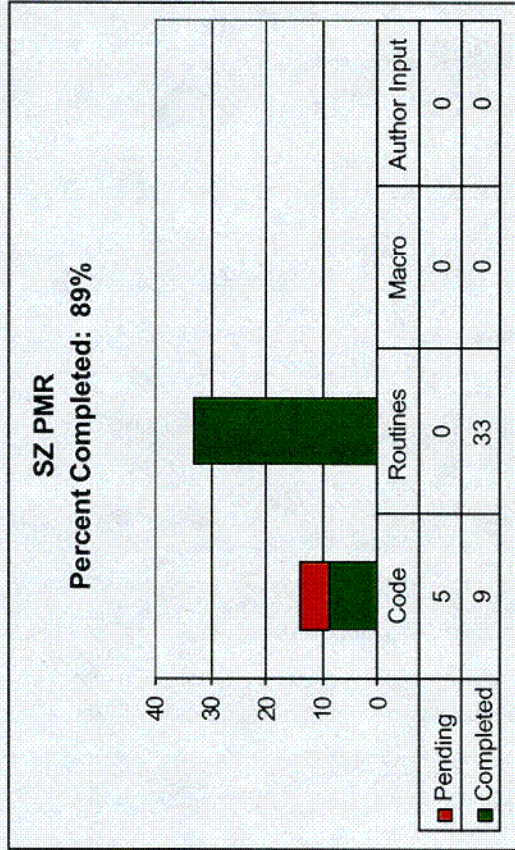
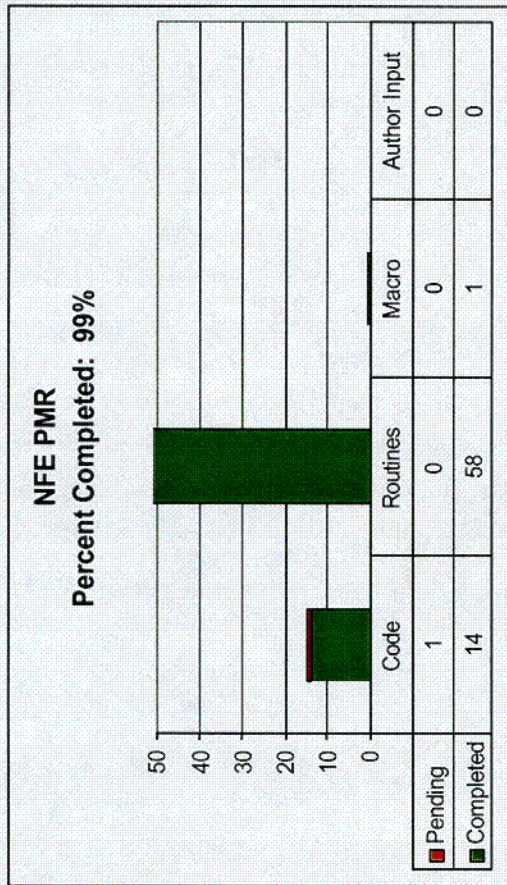
- BIO 90%
- DE 100%
- EBS 96%
- ISM 100%
- NFE 99%
- SZ 89%
- UZ 98%
- WF 100%
- WP 100%

Note: The number of software packages varies as analyses mature and are revised.

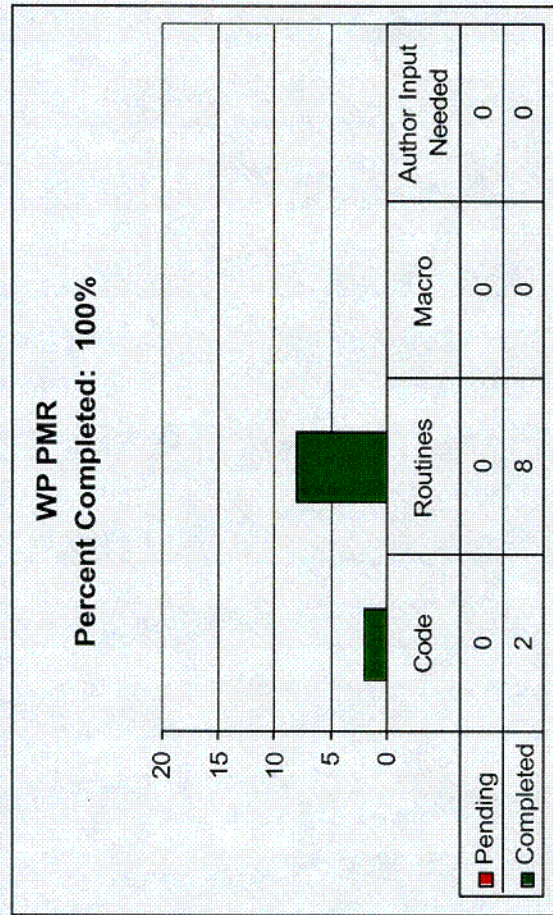
Software Qualified by PMR



Software Qualified by PMR (Continued)



Software Qualified by PMR (Continued)



Unique Unqualified Software Codes

- There are currently fourteen codes being managed in accordance with AP-SI.1Q Revision 3, Section 5.10 "Interim Use of Unqualified Software...".

| | |
|--------------------|---------------|
| ERMA SITEGEOLOGIST | Version 6.0.1 |
| FEHM | Version 1.99 |
| FEHM | Version 2.10 |
| INFIL | Version 2.0 |
| INFIL | Version A2.a1 |
| LAGRIT | Version 1.0 |
| NETPATH | Version 2.13 |
| PEST | Version 2.0 |
| PETROSYS | Version 7.60d |
| STO-UNSAT | Version 1.0LV |
| TOUGH2 | Version 1.3 |
| TOUGH2 | Version 3.4.3 |
| TOUGHREACT | Version 2.3 |
| UDEC | Version 3.0 |

DR-039 Status KEY POINTS

- **Extent of deficiency was more than anticipated based on information obtained from the ongoing investigation**
- **Re-evaluated extent of condition and significantly broadened the corrective actions**
- **To date, corrective actions involve only documentation and similar problems, but no impact on the integrity of the software output or on the technical products**
- **New Commitment to close DR on or before 9/18/01**

Open Deficiency Report - DR-039

- **LVMO-00-D-039: Issued 02/15/2000**
- **Brief Description:**
 - Inaccurate documentation and validation of software routines and macros
- **Issue:**
 - Some software routines documented as part of the Analysis Model Reports (AMRs) are not adequately documented per AP-SI.1Q. Issues include missing test information, missing source code, and lack of version control
- **Solution:**
 - Correct/Amend AMR documentation to ensure reproducibility and defensibility of software routines. AMRs that are not revised will have their record packages appended to include missing information
 - Issue new Software Management Procedure
 - Raise Management Awareness

Open Deficiency Report - DR-039 (Continued)

- **Based on information emerging from the extent of condition and corrective action DR-039 has expanded to include documents with software routines other than AMRs (e.g., engineering documents)**
- **The Document Input Reference System (DIRS) for the technical bases documents supporting a potential Site Recommendation were reviewed to identify additional documents that might contain software routines**
- **Based on the expanded extent, additional time was requested and approved to complete the additional corrective actions**
- **Significant progress is being made to ensure that software routine documentation for technical bases documents is reproducible and defensible**

DR 39 Status 04/09/01 - Software routines have been classified and placed in Bins

- A comprehensive review of 123 AMRs that support the 9 PMRs was conducted. AMR software routine documentation was classified into bins.
- Definition of Bins:
 - Bin 1: No single use routines/macros developed in AMR (Current Status: 31 AMRs).
 - Bin 2: All software used in AMR were adequately documented in the AMR (Current Status: 31 AMRs).
 - Bin 3: Commercial software (i.e. Built in-functions, math operators, or formulas) were not adequately documented inside the AMR (Current Status: 41 AMRs).
 - Bin 4: Developed software (i.e. routines developed in C, FORTRAN, BASIC) including some use of commercial software were not adequately documented in the AMR (Current Status: 20 AMRs).
- BSC is working with authors/developers to resolve issues.
- Required corrections/additions are being made to AMRs or AMR Record Packages.

DR -039 Status 04/09/01

Current BSC Status

- **Item 1 –Total affected AMRs: 61, Bin 3: 41, Bin 4: 20 -- working with Author/Developer to resolve issues**
 - 25 Complete No issues
 - 30 working with Author/Developer to resolve issues
 - 6 Being packaged for OQA review
 - 61 Total AMRs
- **Item 2 - Multi-Use Software Routines and Macros**
 - Software Routine(s) Total 179 as of 3/30 per SCM
 - Complete No issues 101
 - SRRs Completed with Issues 44, being Re-worked
 - SRRs Not yet reviewed 34
 - 179 Total SRRs
- **Item 3 – Ongoing reviews for DIRS items supporting potential SR technical bases documents and SDDs**



U.S. Department of Energy
Office of Civilian Radioactive Waste Management

Corrective Action Status

Presented to:

NRC/DOE Quality Assurance Meeting

Presented by:

Robert Clark, Director

Office of Quality Assurance

Yucca Mountain Site Characterization Office

April 17, 2001

**YUCCA
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OQA INTERIM ACTION TO VERIFY DEFICIENCY REPORT (DR-039)

- **Verification Approach:**
 - **Review analyses and model reports (AMR) and other technical bases documentation packages**
 - **Ensure documentation meets requirements**
 - **Ensure completeness/accuracy of documentation**
 - **Resolve any issues prior to acceptance**
 - **100% verification is planned**
 - **Verification is conducted as reviews are completed by Software Configuration Management (SCM)**

OQA INTERIM ACTION TO VERIFY DEFICIENCY REPORT (DR-039)

(Continued)

- **Verification Results:**
 - **BIN 1: (31 AMRs) 100% verified/accepted**
 - ✓ **Resulted in moving 8 AMRs to BIN 3**
 - **BIN 2: (31 AMRs) 100% verified/accepted**
 - **BIN 3 and 4: (25 of 61) 40% verified/accepted**
 - **Software Routine Reports (SRRs): (179) 0% verified**
 - **Document Input Reference System (DIRS) for technical bases documents for potential Site Recommendation: 0% verified**
 - **No open issues in any of the completed verifications**
 - **Numbers and percentages are subject to change as verification of the SRRs and technical bases documents begin**

DEFICIENCY REPORTS STATUS AND PATH FORWARD

- **Current Status:**
 - **As of 04/04/00, total number of Deficiency Reports (DRs) open = 42**
 - **Majority are being managed within goal to close within 100 days**
 - **Current total number of DRs open > 100 days = 15**

DEFICIENCY REPORTS STATUS AND PATH FORWARD

(Continued)

- **Path Forward:**
 - **Sustaining our goal for effective and timely resolution of deficiencies is an OCRWM and BSC Management top priority**
 - **Responsibilities, corrective actions and completion dates have been reviewed and confirmed or changed for each transitioned BSC deficiency document**

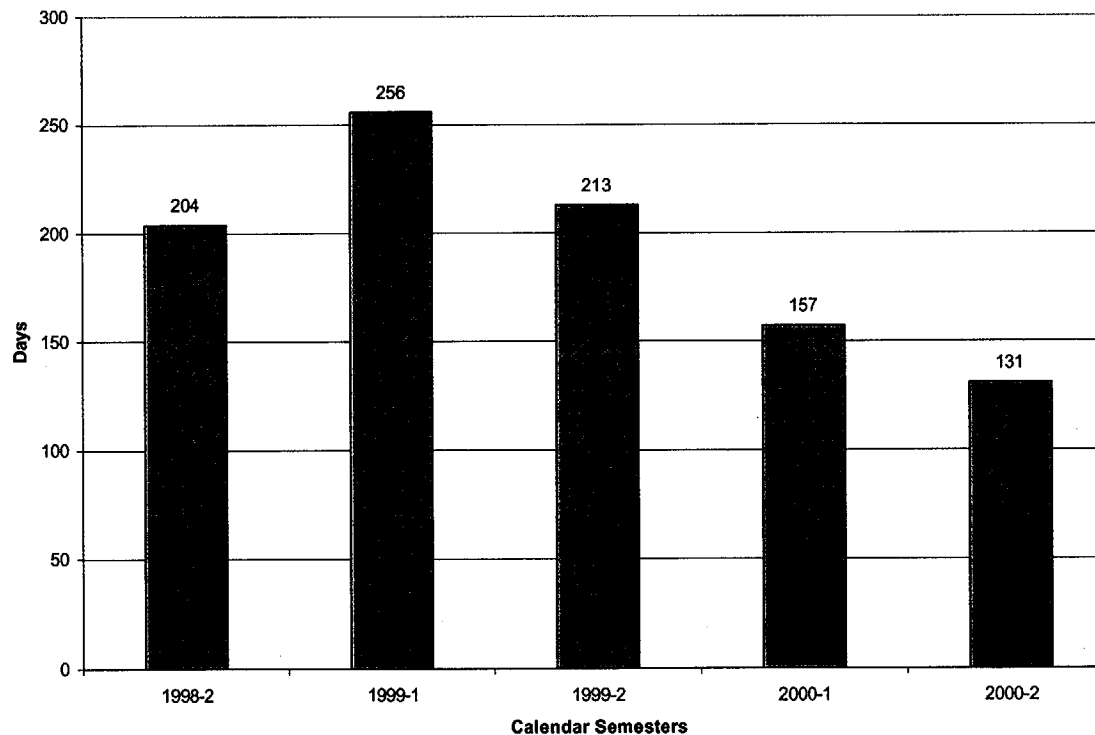
DEFICIENCY REPORTS STATUS AND PATH FORWARD

(Continued)

- **Path Forward:**
 - **OQA has reassigned Quality Assurance Representative (QAR) responsibilities for some prioritized DRs; e.g., DR-039, which will facilitate resolution/closure**
 - **BSC will re-assess DRs that are over 100 days old to ensure that adequate resources are applied**
 - **OCRWM and BSC Senior Management will monitor resolution process**

CORRECTIVE ACTION TIMELINESS

- **Average Days to Close DR/CARs**



Trend Analysis for last two years continues to show improvement.

Corrective Action Board (CAB)

- **The CAB function is in operation**
- **The BSC General Manager has enhanced the CAB function by holding biweekly Open Items meetings**
- **DRs, NCRs, and CIRS items are discussed at the meeting**
- **Responsible managers provide the status of overdue items, i.e., why they are late, and what is being done to resolve the issue(s)**
- **DOE and NRC representatives have a standing invitation to attend the Open Items meeting**

AUDIT M&O-ARP-01-02 UNSATURATED ZONE FLOW AND TRANSPORT PROCESS MODEL REPORT FEBRUARY 5-9, 2001

- **Overall Results - critical process steps were effectively implemented**
- **Audit revealed significant improvement in area of software**
- **Previous audit recommendations were incorporated**
- **One DR issued:**
 - **LVMO-01-D-044, relating to the processing and closure of AP-3.14Q Input Transmittals**
- **Twelve previously issued DRs were evaluated for effectiveness of corrective action taken, with satisfactory results**

AUDIT M&O-ARP-01-01 ENGINEERED BARRIER SYSTEM PROCESS MODEL REPORT FEBRUARY 20-23, 2001

- **Overall Results - critical process steps were effectively implemented**
- **Three conditions adverse to quality were identified:**
 - **DR BSC-01-D-050, relating to model validation. Due to the potentially repeatable nature of this issue, Suspect Trend Investigation Report (STIR) BSC-01-004 was issued to evaluate overall effectiveness of corrective actions on traceability and transparency.**

AUDIT M&O-ARP-01-01 ENGINEERED BARRIER SYSTEM PROCESS MODEL REPORT FEBRUARY 20-23, 2001

(Continued)

- DR BSC-01-D-051, relating to traceability, transparency and calculation problems in one AMR. Due to the potentially repeatable nature of this issue, STIR BSC-01-003 was issued to evaluate overall effectiveness of corrective actions on traceability and transparency**
- Deficiency Identification and Referral 01-01 to DR LVMO-01-D-044, relating to the processing and closure of AP-3.14Q Input Transmittals**
- Eleven previously issued DRs were evaluated for effectiveness of corrective actions taken, with satisfactory results**

REPETITIVE DEFICIENCY EVALUATION

- Trend data and audit deficiencies exhibit need for OQA to further investigate the potential for recurring deficiencies
- STIRs initiated for the following:
 - LVMO-01-001 Implementation of the DIRS described in AP-3.15Q - No adverse quality trend, current corrective action plans adequate
 - BSC-01-002 Inadequate usage of Scientific Notebooks as required by AP-SIII.1Q - Although STIR evaluation not yet completed, no apparent adverse trend has been identified
 - BSC-01-003 Documentation of traceability and transparency errors - STIR evaluation is in progress
 - BSC-01-004 Models are not validated in accordance with AP-3.10Q - STIR evaluation is in progress

AUDIT OBSERVER INQUIRIES UNSATURATED ZONE (UZ) AND ENGINEERED BARRIER SYSTEM (EBS) AUDITS

UZ PMR Audit

4 Technical NRC Inquiries

Status: Responses in progress

EBS PMR Audit

2 NRC Inquiries

(1 QA, 1 Technical)

Status: Responses in progress

Note: Technical inquiries are processed by DOE Office of Licensing and Regulatory Compliance (contact: Tim Gunter); QA inquiries are processed by OQA (contact: Kristi Hodges)

DOE OQA AUDIT RECOMMENDATIONS

- **FY01 OQA & future audit recommendations input to and tracked through the CIRS**
 - **Recommendations input by the OQA Lead Auditor**
 - **CIRS number for each recommendation included in the Audit Report**
 - **Any action assignment or commitments tracked through CIRS**
 - **OQA follow-up at next audit**
- **FY00 PMR Audit Technical Recommendations (backlog) tracked by OQA**
 - **OQA database established to track PMR recommendations for only 10 audits**
 - **Tracking only 175 items to closure**
 - **Approximately 113 items either closed or ready for closure verification**
 - **Used in lieu of CIRS to ensure timely OQA involvement**

NRC INTERFACES FOR OBSERVING VENDOR AUDITS

- **BSC Vendors:**
 - **Robert Hartstern, Procurement Quality Manager (Acting), 702-295-2675**
 - **James Blaylock, DOE/OQA, 702-794-1420**
- **DOE Vendors:**
 - **Robert Hasson, QATSS QA Verification Manager, 702-794-5023**
 - **James Blaylock, DOE/OQA, 702-794-1420**

**Vendor Audit Schedule, Revision 1 available on OCRWM Home Page
or hard copy**



U.S. Department of Energy
Office of Civilian Radioactive Waste Management

Improvements to the Key Technical Issue (KTI) Meeting Process

Presented to:
NRC/DOE KTI Status Meeting

Presented by:
Timothy Gunter
Office of Licensing & Regulatory Compliance
Yucca Mountain Site Characterization Office

April 17, 2001

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KTI Meetings To Date

- **KTI Meetings have been productive and have resulted in improved interactions with the NRC**
- **Lessons from meetings to date will allow improvements and enhancements for future meetings**

Potential Enhancement Areas

- **Resources**
- **Schedule**
- **Logistics**
- **Presentations**
- **Delivery**
- **Preparation**