

# Memorandum

QA: QA

DATE: FEB 25 2002

REPLY TO


ATTN OF: RW-3 (Ram Murthy/4-5549)

SUBJECT: VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY  
REPORT (DR) YMSCO-01-D-140 RESULTING FROM THE OFFICE OF QUALITY  
ASSURANCE (OQA) AUDIT YMSCO-ARC-01-14

TO: YMSCO/OIM (R. N. Wells)

The OQA staff has evaluated the corrective action of DR YMSCO-01-D-140 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Dennis C. Threatt at (702) 794-1495.

  
Ram Murthy, Acting Director  
Office of Quality Assurance

OQA:JB-0685

Enclosure:  
DR YMSCO-01-D-140

FEB 25 2002

cc w/encl:

N. K. Stablein, NRC, Rockville, MD  
Robert Latta, NRC, Las Vegas, NV  
S. W. Lynch, State of Nevada, Carson City, NV  
Engelbrecht von Tiesenhausen, Clark County, Las Vegas, NV  
K. G. Hess, BSC, Las Vegas, NV  
T. J. Wall, BSC, Las Vegas, NV  
W. J. Glasser, NQS, Las Vegas, NV  
K. A. Hodges, NQS, Las Vegas, NV  
D. G. Opielowski, NQS, Las Vegas, NV  
D. C. Threatt, NQS, Las Vegas, NV  
J. R. Dyer, DOE/YMSCO, Las Vegas, NV  
C. E. Hampton, DOE/YMSCO, Las Vegas, NV  
D. G. Horton, DOE/YMSCO, Las Vegas, NV  
J. M. Replogle, DOE/YMSCO, Las Vegas, NV  
B. M. Terrell, DOE/YMSCO, Las Vegas, NV  
D. R. Warriner, DOE/YMSCO, Las Vegas, NV

NM5507  
wm-11

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

8.  ORIGINAL DEFICIENCY REPORT  
 CORRECTIVE ACTION REPORT  
 NO. YMSCO-01-D-140  
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**DEFICIENCY/CORRECTIVE ACTION REPORT**

1. Controlling Document: AP-6.1Q, Rev. 6, ICN 0, <i>Controlled Distribution</i>	2. Related Report No.: YMSCO-ARC-01-14
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3. Responsible Organization: Yucca Mountain Site Characterization Office (YMSCO)	4. Discussed With: Catherine Hampton, Dee Jensen, David Warriner
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5. Requirement:

AP-6.1Q, Rev. 6, ICN 0, Attachment 2, "Instructions for Completing the Office of Civilian Radioactive Waste Management Document Control Action Request (DCAR)" requires that in blocks 18-23, the Document Owner print and sign name, enter the date signed, and enter the Document Owner's organization, department, location, and/or mail stop, and telephone number.

6. Description of Condition:

Contrary to the above requirements for AP-6.1Q, Rev. 6, ICN 0, the Document Owner is identified in the Office of Civilian Radioactive Waste Management Program Documents Database (OPDD) as Bob Wells, Office of Information Management. The individual entered on the DCAR as the Document Owner is David Keller, Records Management. For AP-17.1Q, Rev. 2, ICN 0, *Record Source Responsibilities for Inclusionary Records*, the Document Owner is identified in the OPDD as Bob Wells. The individual entered on the DCAR as the Document Owner is David Keller and signed for by Denise Gibson, Review Coordinator.

7. Initiator: <i>Dennis C. Threatt</i> Dennis C. Threatt Date 8/22/01	9. Does a stop work condition exist? (Not required for a DR) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Check One: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
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10. Recommended Actions:  
*NONE.*

11. QA Review: <i>Dennis C. Threatt</i> QAR Dennis C. Threatt Date 9/19/01	12. Response Due Date: 10 Working Days From Issuance
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13. DOQA Issuance Approval: Printed Name Ram Murthy Signature <i>James Blaylock</i> Date 9/24/01
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22. Corrective Actions Verified: QAR <i>Dennis C. Threatt</i> Date 2/15/2002	23. Closure Approved by: DOE/OQA <i>[Signature]</i> Date 2/26/02
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TYPE RESPONSE:

- Initial
- Complete
- Amended

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DR/CAR NO. YMSCO-01-D-140

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**DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)**

14a. Immediate Actions:

No immediate actions are necessary since there is no impact on quality. The issues raised in the DR are administrative rather than substantive. As described in section 15 below, the problem is a result of confusing directions provided in procedures. The result, however, is that it had no impact on the proper distribution of the procedures.

Compliance Date: NA

14. Remedial Actions:

No immediate remedial actions need to be taken. When the revision of AP-6.1Q is completed as described in section 17 below, the actions flowing from that procedure will remediate the conditions described in this DR.

15. Extent of Condition:

A review of AP-6.1Q, Rev. 6, ICN 0, sections 3.12, Document Owner, 3.19, and sections 5.1 and 5.4 reveals that Robert Wells is the Responsible Manager but not the Document Owner for both AP-6.1Q and AP-17.1Q. This conclusion is based on the fact that Robert Wells has approval authority for these procedures as the Director of the OCRWM Office of Information Management but does not carry out the activities as Document Owner for these procedures as described in AP-6.1Q, sections 5.1 through 5.7. A review of those names of federal personnel listed as Document Owners on the OPDD is that they are all either Project Manager, Assistant Managers, or Office Directors who are Responsible Managers but in all likely hood do not perform the tasks of a Document Owner as described in AP-6.1Q. See Continuation Page.

16. Cause: (Attach results of root cause determination prepared in accordance with AP-16.4Q for a significant deficiency.)

One, there is no clear distinction made in AP-6.1Q between the Document Owner and the Responsible Manager. In fact, the procedure allows that the same person could perform the two functions. Two, there is inconsistency in the terminology and activities used in AP-5.1Q, Plan and Procedure Preparation, Review, and Approval and AP-6.1, Controlled Distribution. AP-5.1Q uses the terms "Preparer" and "Responsible Individual". AP-6.1Q uses the terms "Document Owner" and "Responsible Manager". In section 5 of each procedure there is an overlap in activities between the Preparer and the Document Owner.

17. Action to Preclude Recurrence:

Revise AP-6.1Q to clearly define and distinguish the rolls and responsibilities of individuals performing actions for the preparation, approval, and distribution of controlled documents and to ensure that AP-6.1Q is integrated with AP-5.1Q in terminology used, responsibilities assigned, and process flow followed. Based on this revision, revise the position titles on the OPDD consistent with the revised procedure.

18. Due Date: January 31, 2002

- For submittal of complete response
- For completion of corrective action

19. Response by:

*for* *Robert Wells* *James M. Sheehan*  
 Robert Wells Date October 19, 2001 Phone (9)562-6622

20. Evaluation:  Accept  Partially Accept  Reject

QAR *Dennis Threath* Date 10/21/2001

21. Concurrence:

DOQA *James Blaylock Jr* Date 10/29/01

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8.  DR/CAR  
 Stop Work Order

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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

15. Continuation

For example, Russ Dyer, Project Manager, is listed as the Document Owner for AP-2.19Q, Quality Assurance Requirements and Description Requirements Matrix and Impact Evaluation, AP-2.20Q, Self Assessments, AP-PMC-008, Conduct of the Project Operations Review Board, AP-REG-004, Conditions/Issue Identification and Reporting/Resolution System, AP-REG-005, Managing External Recommendations and Commitments, AP-REG-007, Occurrence Reporting and Processing of Operations Information, QAP-2.6, Readiness Review, and YAP-30.60, Documenting Decisions. The same list could be generated for Allen Benson, Lead Manager for Institutional Affairs, Steve Brocoun, Assistant Manager for the Office of Licensing and Regulatory Compliance, Suzanne Mellington, Assistant Manager for the Office of Project Execution, Victor Trebules, Director of the Office of Project Control, and Robert Wells, Director of the Office of Information Management. All of these personnel are the heads of their respective organizations and have approval authority for the procedures that flow from that function, but none of them perform the tasks of the Document Owner as described in AP-6.1Q.

TYPE RESPONSE:

- Initial
- Complete
- Amended

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**DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)**

14a. Immediate Actions:

No Change

Compliance Date:

14. Remedial Actions:

No Change

15. Extent of Condition:

No Change

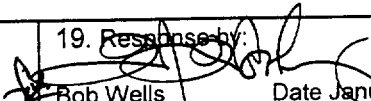
16. Cause: (Attach results of root cause determination prepared in accordance with AP-16.4Q for a significant deficiency.)

No Change


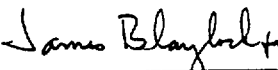
17. Action to Preclude Recurrence:

No change. Change in corrective action due date only. See continuation page.

18. Due Date: February 15, 2002  
 For submittal of complete response  
 For completion of corrective action

19. Response by:   
 Bob Wells                      Date January 11, 2002                      Phone (9)562-6622

20. Evaluation:  Accept     Partially Accept     Reject

21. Concurrence:  
 QAR  1/23/2002                      Date                      DOQA                       Date 2/1/02

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 Stop Work Order  
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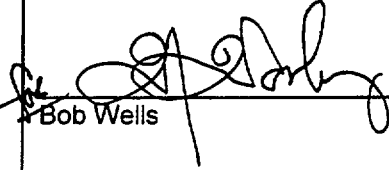
DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

REQUEST FOR EXTENDED PROCESSING:

Due to evolving issues related to this DR, additional time is needed to complete the actions to preclude recurrence. No adverse impact is expected, as these actions are mainly shortcomings within the AP-6.1Q process of which the procedure is currently undergoing the revision process.

REQUEST FOR EXTENSION OF COMPLETED ACTIONS:

The current corrective action due date for this DR is January 31, 2001. Due to the holiday shutdown, the procedure revision process has experienced a lag time of the preparation and review process. The procedure has since been revised and is currently undergoing the formal review process. Request an extension for the completion of the review and administrative processing until February 15, 2002.

  
\_\_\_\_\_  
Bob Wells

1/11/02  
\_\_\_\_\_  
Date

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RADIOACTIVE WASTE MANAGEMENT  
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WASHINGTON, D.C.

8.  DR/CAR  
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2602/19/02

DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Corrective action for the subject DR required that AP-6.1Q be revised and the OCRWM Program Documents Database (OPDD) be corrected to reflect the titles in the revised procedure. AP-6.1Q was revised with an effective date of 2/6/2002 to provide titles consistent with AP-5.1Q. A review of the OPDD indicated that titles were changed consistent with the revised AP-6.1Q.

 2/15/2002  
Dennis Threatt, QAR Date