



Department of Energy

Washington, DC 20585

QA: QA

MAR 06 2002

C. M. Sparks
Bechtel SAIC Company, LLC
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Las Vegas, NV 89144

VERIFICATION OF CORRECTIVE ACTIONS AND CLOSURE OF DEFICIENCY REPORT (DR) BSC-02-D-062

The Office of Quality Assurance staff has evaluated the corrective actions of DR BSC-02-D-062 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 John R. Doyle at (702) 794-5021.

James Blaylock
Ram Murthy, Acting Director
Office of Quality Assurance

OQA:JB-0749

Enclosure:
DR BSC-02-D-062



Printed with soy ink on recycled paper

*Noted
DR-02
John R. Doyle*

cc w/encl:

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ORIGINAL

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

8. DEFICIENCY REPORT
 CORRECTIVE ACTION REPORT
NO. BSC-02-D-062
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1/23/02

DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document:
NWI-ESF-021Q, Rev. 1, ICN 0

2. Related Report No.:
NCR YMSCO-02-0017

3. Responsible Organization:
SITE OPERATIONS

4. Discussed With:
R. Dresel, C. Garrett, D. Osborne

5. Requirement:
NWI-ESF-021Q, DIESEL-POWERED EQUIPMENT EMISSIONS TESTING AND CONTROL PROCEDURE, paragraph 3.6, 2, states:
"Ensure fuel samples are taken in accordance with the testing laboratorie's instructions a minimum of once per calendar quarter for analysis of sulphur content".

6. Description of Condition:
As recorded in NCR YMSCO-02-0017, the diesel sulphur content tests, required by procedure NWI-ESF-021Q, have not been taken since August of 2000.
Pertinent information:
The referenced NCR was dispositioned use-as-is based, primarily, on two factors.
1) The requirement to perform diesel fuel sulphur content tests was removed from the Specifications in 1996 (reference DR LVMO-96-D-039 and RFC 96-045) but has not been deleted from the referenced procedure.
2) 40CFR80.29 prohibits the manufacture, import, sell, or transport of any diesel fuel in the U.S.A. with a sulphur content of more that .05% by weight. The DIE sulphur content limit is also .05% by weight.

7. Initiator:
Howard Cox
Howard Cox Date 01/09/02

9. Does a stop work condition exist? (Not required for a DR)
 Yes No
If Yes, Check One: A B C D

10. Recommended Actions:
NONE

11. QA Review:
QAR *John Doyle* Date *1/29/02*

12. Response Due Date:
10 working days from issuance

13. DOQA Issuance Approval:
Printed Name Ram Murthy Signature *James Blaylock Jr* Date *1/30/02*

22. Corrective Actions Verified
QAR *John Doyle* Date *2/28/02*

23. Closure Approved by:
DOQA *James Blaylock Jr* Date *3/6/02*

TYPE RESPONSE:

- Initial
- Complete
- Amended

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EFF
2112.02

DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)

14a. Immediate Actions:

Block 6 indicates no immediate action was required.

Compliance Date: N/A

14. Remedial Actions:

Revise by ECN, NW1-ESF-21Q to more clearly respond to the requirement specified in Specification 01501, Paragraph 3.01 S4, by removing the need for testing and clarifying the means of reporting.

15. Extent of Condition:

Investigation of this condition determined that due to 40 CFR 80.29 (see Block 6, Paragraph 2) that no diesel fuel with a sulfur content greater than 0.05% by weight has been delivered or consumed underground. There is no impact to quality.

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

Failure to follow/implement the requirements of NW1-ESF-021Q by Responsible Individual. The cause of the deficiency identified in Block 6, failure to follow/implement procedural requirements, has been previously identified during project performance assessment activities. In response to these assessment identified deficiencies, BSC has initiated a training and mentoring process to emphasize procedural/drawing adherence.

17. Action to Preclude Recurrence:

The Responsible Individual subsequently received Procedural Adherence Training as outlined in Block 16.

18. Due Date: February 15, 2002

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

19. Response by:

Ralph Dresel

Ralph Dresel *JMB* *MAR* *BSC QA # 2/13/02*
Date *2.13.02* Phone 295-7366 *PK*

20. Evaluation: Accept Partially Accept Reject

QA *John N. ...* Date *2/14/02*

21. Concurrence:

DOQA *James B. ...* Date *2/15/02*

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8. DR/CAR
 Stop Work Order

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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Verification of Committed Corrective Actions to Deficiency Report BSC-02-D-062

DG° 9/5/02

Block 14a: Immediate Action:

None Required

Block 14 Remedial Actions:

Verified para. 3.6.3 of ECN 0, 1 dtd. 2/26/02, to NW-ESF-21Q Rev. 1 "Diesel -Powered Equipment Emissions Testing and Control Procedure" Rev 1 (clarifying Para. 3.01 S4 of Specification BAB000000-01717-6300-01501) to require " ... certificate of conformance to 40 CFR 80.29, material test reports or other means to identifying the fuel sulfur content ... "

Block 15 Extent of Condition:

See Complete Response.

Block 16 Cause:

See Complete Response

Block 17 Action to Preclude Recurrence:

Verified Safety Meeting Report concerning Strict Adherence Orientation for J. Dudley and J. Williamson dtd. 1/10/02.

The Above Committed Corrective Actions have been satisfactorily verified.

This Deficiency Report is considered closed.

QAR:

John R. Doyle

Date:

2/28/02

John R. Doyle