



QA: QA

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Las Vegas, NV 89144

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORTS (DR) BSC(V)-02-D-040 AND BSC(V)-02-D-041 RESULTING FROM THE BECHTEL SAIC COMPANY, LLC (BSC) QUALITY ASSURANCE AUDIT BSC-SA-02-006 OF CAROLINA COMMERCIAL HEAT TREATING, INC.

BSC Quality Assurance has verified implementation of corrective action for DRs BSC(V)-02-D-040 and BSC(V)-02-D-041 and determined the results to be satisfactory. As a result, the DRs have been closed.

If you have any questions, please contact either Richard L. Maudlin at (702) 295-2961 or Daniel A. Klimas at (702) 295-2665.

A handwritten signature in black ink, appearing to read 'D. T. Krisha'.

Donald T. Krisha, Manager  
Quality Assurance

3/15/02

Date Signed

RLM:bw-0312021768

Enclosures:  
DR BSC(V)-02-D-040  
DR BSC(V)-02-D-041

*Handwritten notes:*  
Held: Melissa Wyatt  
KIMISSC07  
WM-11

March 15, 2002

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cc w/encl:

L. H. Barrett, DOE/HQ (RW-2) FORS  
L. W. Bradshaw, Nye County, Pahrump, NV  
J. R. Dyer, DOE/YMSCO, Las Vegas, NV  
W. J. Glasser, NQS, Las Vegas, NV  
S. H. Horton, BSC, Las Vegas, NV  
D. A. Klimas, BSC, Las Vegas, NV  
B. R. Kornegay/B.L. Wilson, BSC, Las Vegas, NV  
D. T. Krisha, BSC, Las Vegas, NV  
Robert Latta, NRC, Las Vegas, NV  
S. W. Lynch, State of Nevada, Carson City, NV  
Ram Murthy, DOE/OQA, Las Vegas, NV  
D. G. Opielowski, NQS, Las Vegas, NV  
J. M. Repogle, DOE/YMSCO, Las Vegas, NV  
N. K. Stablein, NRC, Rockville, MD  
D. D. von der Linden, BSC, Las Vegas, NV  
Engelbrecht von Tiesenhausen, Clark County, Las Vegas, NV

cc w/encl:

R. W. Andrews, BSC, Las Vegas, NV  
R. L. Maudlin, BSC, Las Vegas, NV  
Carolyn Moyers, BSC/FANP, Las Vegas, NV  
R. E. Rucinski, BSC, Las Vegas, NV  
Roxanna VanDillen, BSC, Las Vegas, NV

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RADIOACTIVE WASTE MANAGEMENT  
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WASHINGTON, D.C.**

8.  DEFICIENCY REPORT  
 CORRECTIVE ACTION REPORT

NO. BSC(V)-02-D-040

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**DEFICIENCY/CORRECTIVE ACTION REPORT**

1. Controlling Document:  
Carolina Commercial Heat Treating (CCHT) Quality Policy Manual,  
Revision 3 and Quality System Procedure QSP-111, Revision 7.

2. Related Report No.:  
BSC-SA-02-006

3. Responsible Organization:  
BSC/ Carolina Commercial Heat Treating (CCHT)

4. Discussed With:  
M. Peters, BSC; G. Smith, CCHT

5. Requirement:

QSP-111, Section 4.7, states in part: "Obsolete reference documents will be retained for a period of 2 years minimum, or longer if required by contract."

6. Description of Condition.

Contrary to the above, CCHT has not maintained obsolete revisions of Quality System Procedures.

7. Initiator:  
*R. L. Maudlin*  
Richard L. Maudlin FOR

Date 12/13/01

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:

Take the necessary action to identify the method CCHT will implement to maintain copies of previous revisions to QSP's in the future.

Determine if condition had any affect on the heat treating work performed on Metal Samples Company specimens used on YMP orders.

11. QA Review: *R. L. Maudlin*  
QAR Richard L. Maudlin FOR Date 12/13/01

12. Response Due Date:  
20 Working Days From Issuance

13. DOQA Issuance Approval:

Printed Name Donald T. Krisha

Signature *Donald T. Krisha*

Date 12/14/01

22. Corrective Actions Verified:

QAR *R. L. Maudlin* FOR Date 3-12-02

23. Closure Approved by:

*D. T. Krisha*

Date 3/15/02

TYPE RESPONSE:

- Initial
- Complete
- Amended

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DR/CAR NO. BSC(V)-02-D-040  
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**DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)**

14a. Immediate Actions:

N/A - No YMP-related work currently being performed by CCHT.

Compliance Date: *N/A* *Per 3-12-02*

14. Remedial Actions:

Procedure QSP-111 has been revised to change the wording to state, "Obsolete documents are to be removed from current files and destroyed. Obsolete documents may be retained as "Reference Only" documents if needed, but must be marked "OBSOLETE REFERENCE ONLY."

CCHT will provide a sample of release sign off forms as described in section 4.4 of QSP 111 to show compliance with maintaining revision history.

15. Extent of Condition:

The deficient condition stated in this DR was mainly a clarification issue, therefore, it did not have any *impact* *02/21/02* on the heat treating work performed on Metal Samples Company specimens which were procured for YMP quality-affecting activities.

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

The CCHT Quality Manager misunderstood what the auditor meant when asked about previous revisions to QSP's vs. "Obsolete Documents." The procedure was not clear as to the difference between obsolete documents and revisions made to procedures. Obsolete documents, as described in QSP 111, refers to standards (e.g., ASME, ASTM, etc.) where the vendor has no control of the revision to those standards. Therefore, when a standard is revised, CCHT considers them to be obsolete. The revision of QSP's is discussed in section 4.4 of QSP 111.

17. Action to Preclude Recurrence:

CCHT will train all applicable personnel on the revised version of QSP 111.

18. Due Date: February 28, 2002

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

19. Response by: Mark Peters (Roxie VanDillen - Resp. Ind.)

*William VanDillen for MP* *Roxie VanDillen* *2/14/02*  
Date: February 14, 2002 *RF* Phone: 5-3644 *RF BSC 2/14/02*

20. Evaluation:  Accept  Partially Accept  Reject

QAR *Manelli* Date *02/21/02*

21. Concurrence:

DOQA *W.T. Kisho* Date *2/25/02*

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8.  DR/CAR  
 Stop Work Order  
NO. BSC(V)-02-D-040  
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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF

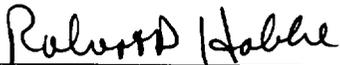
DR BSC(V)-02-D-040

On March 08, 2002, a follow-up verification was performed to verify implementation of corrective action to Deficiency Report BSC(V)-02-D-040. This follow-up verification was based on a review of QSP 111, Revision 8, and other documentation as referenced below. Section 4.7 of QSP 111, Revision 8, reflects a change in the wording to state: "Obsolete documents are to be removed from the current files and destroyed. Obsolete documents may be retained as "Reference Only" documents if needed, but must be marked "Obsolete Reference Only"." Also, reviewed the following documentation to support implementation of corrective action:

- Release Sign-Off Forms for QSP-137, Rev. 4; QSP-125, Rev. 9; and QSP-126C, Rev. 2. Reason for change was clearly documented to reflect revision history.
- Training Record dated 02/14/02 supporting the training of five CCHT personnel to QSP-111, Revision 8.

The documentation provided, including the response to the DR, satisfactorily resolves the condition adverse to quality and implements the corrective actions stated in the DR response.

Based on the above, this DR is considered closed.



Richard L. Maudlin

3-12-02

Date Signed

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8.  DEFICIENCY REPORT  
 CORRECTIVE ACTION REPORT

NO. BSC(V)-02-D-041

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**ORIGINAL**  
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**DEFICIENCY/CORRECTIVE ACTION REPORT**

1. Controlling Document: Carolina Commercial Heat Treating (CCHT) Quality Policy Manual, Revision 3	2. Related Report No.: BSC-SA-02-006
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3. Responsible Organization: BSC/ Carolina Commercial Heat Treating (CCHT)	4. Discussed With: M. Peters, BSC; G. Smith, CCHT
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5. Requirement:  
  
CCHT Quality Policy Manual, Section 4.6.2.2, states: "Sub-contractors are assessed and selected based on their ability to meet requirements including quality system and quality assurance requirements."

6. Description of Condition:  
  
Contrary to the above, no objective evidence could be provided to reflect that CCHT had performed a review of Conrad-Kacsik's and Geocorp Industrial's quality program documents and determined that they met the quality requirements imposed by CCHT (ISO/IEC Guide 25 or other National Standards).

7. Initiator: <i>R. Maudlin FOR</i> Richard L. Maudlin <i>FOR</i> Date 12/13/01	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:  
  
Take the necessary action to acquire copies of Conrad-Kacsik's and Geocorp Industrials quality program documents, perform a review to verify that they meet CCHT's requirements as appropriate, and document acceptance.  
  
Determine if condition had any affect on the heat treating work performed on Metal Samples Company specimens used on YMP orders.

11. QA Review: <i>R. Maudlin FOR</i> QAR Richard L. Maudlin <i>FOR</i> Date 12/13/01	12. Response Due Date: 20 Working Days From Issuance
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13. DOQA Issuance Approval:  
Printed Name Donald T. Krisha  
Signature *Robert P. Krisha* Date *12/14/01*

22. Corrective Actions Verified: <i>R. Maudlin FOR</i> QAR <i>R.L. MAUDLIN</i> Date <i>3-12-02</i>	23. Closure Approved by: <i>Donald T. Krisha</i> Date <i>3/15/02</i>
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TYPE RESPONSE:

- Initial
- Complete
- Amended

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DR/CAR NO. BSC(V)-02-D-041  
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**DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)**

14a. Immediate Actions:

N/A - No YMP-related work currently being performed at CCHT.

Compliance Date: N/A

14. Remedial Actions:

CCHT will obtain copies of Conrad-Kacsik's and Geocorp Industrials' quality program documents and perform a review to verify that they meet CCHT's requirements. The review and acceptance of that review shall be documented.

An impact analysis will be performed to determine if this deficient condition had any affect on the heat treating work performed on Metal Samples Company specimens, which were procured for YMP quality-affecting activities.

15. Extent of Condition:

The extent of condition will be addressed in the complete response to this DR.

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

An oversight by CCHT to BSC's requirements to review sub-contractors' quality manuals.

17. Action to Preclude Recurrence:

CCHT will issue annual letters to sub-contractors requesting information on any revisions or changes to there quality manuals.

There may be additional actions to preclude recurrence depending on the results of the impact analysis.

18. Due Date: February 28, 2002

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

19. Response by: Mark Peters (Roxie VanDillen - Resp. Ind.)

*Mark Peters* *Roxie Van Dillen 1/30/02*  
Date: January 30, 2002 Phone: 5-3644 *initial gmg JCS 1/30/02*

20. Evaluation:  Accept  Partially Accept  Reject

QAR *[Signature]* Date *02/05/02*

21. Concurrence:

DOQA *[Signature]* Date *2/11/02*

TYPE RESPONSE:

- Initial
- Complete
- Amended

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DR/CAR NO. BSC(V)-02-D-041  
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QA: QA

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

14a. Immediate Actions:

N/A - No YMP-related work currently being performed at CCHT.

Compliance Date: N/A

14. Remedial Actions:

A review of Conrad-Kacsik's and Geocorp Industrials' quality program ~~was~~ <sup>was</sup> conducted and found to be acceptable by the CCHT quality assurance manager. The signature and date of the quality assurance manager on the cover of the subtier suppliers' manuals is indicative that they meet CCHT's requirements.

*DM  
were 2/25/02*

15. Extent of Condition:

There were only two subtier suppliers used by CCHT for services pertaining to the work performed to support YMP quality-affecting activities. These subtier suppliers' quality programs have been evaluated by CCHT and found to be acceptable to CCHT's requirements. Therefore, there is no impact on the services pertaining to the work performed to support YMP quality-affecting activities.

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

An oversight by CCHT to BSC's requirements to review sub-contractors' quality manuals.

17. Action to Preclude Recurrence:

CCHT will issue annual letters to sub-contractors requesting information on any revisions or changes to their quality manuals.

*IR was 2/14/02*

18. Due Date: February 28, 2002

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

19. Response by: Mark Peters (Roxie VanDillen - Resp. Ind.)

*William W. [Signature] Roxie VanDillen 2/14/02  
Date: February 14, 2002 Phone: 5-3644  
BSC 52 2/14/02*

20. Evaluation:  Accept  Partially Accept  Reject

QAR *[Signature]* Date *02/21/02*

21. Concurrence:

DOQA *[Signature]* Date *2/25/02*

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8.  DR/CAR  
 Stop Work Order  
NO. BSC(V)-02-D-041  
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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF

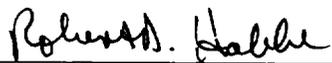
DR BSC(V)-02-D-041

On March 10, 2002, a follow-up verification was performed to verify implementation of corrective action to Deficiency Report BSC(V)-02-D-041. This follow-up verification was based on a review of the following documentation to support implementation of corrective action:

- Cover Page of Conrad Kacsik Instrument Systems, Inc. Quality Manual, Revision H. Cover page was initialed by Gary Smith, CCHT Quality Manager, on 01/08/02, indicating that Conrad Kacsik's documented quality program meets CCHT's Quality Program requirements for calibration services.
- Cover Page of GeoCorp Industrial Controls, Inc. Quality Policy Manual, QP-001-D. Cover page was initialed by Gary Smith, CCHT Quality Manager, on 01/05/02, indicating that GeoCorp's documented quality program meets CCHT's Quality Program requirements for calibration services.
- A copy of a sample letter from CCHT to be sent to subcontractors annually confirming continued compliance to ISO 9000 or ISO Guide 25.

The documentation provided, including the response to the DR, satisfactorily resolves the condition adverse to quality and implements the corrective actions stated in the DR response.

Based on the above, this DR is considered closed.



For Richard L. Maudlin

3-12-02

Date Signed