

# Memorandum

QA: QA

DATE: **MAR 19 2002**

REPLY TO

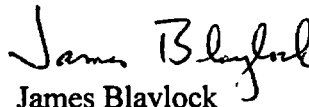
ATTN OF: RW-3 (James Blaylock/4-1420)

SUBJECT: EVALUATION OF COMPLETE RESPONSE, VERIFICATION OF CORRECTIVE ACTION, AND CLOSURE OF DEFICIENCY REPORT (DR) OQA-01-D-146 RESULTING FROM THE OFFICE OF QUALITY ASSURANCE (OQA) AUDIT OQA-ARC-01-015

TO: RW-3 (Ram Murthy)

The OQA staff has evaluated the complete response to, verified the corrective action of DR OQA-01-D-146 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact me at (702) 794-1420.

  
James Blaylock  
Office of Quality Assurance

OQA:JB-0743

Enclosure:  
DR OQA-01-D-146

MAR 19 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  
R. W. Hendrickson, Bechtel/BWXT, Idaho Falls, ID  
Ken Hess, BSC, Las Vegas, NV  
S. H. Horton, BSC, Las Vegas, NV  
R. P. Keele, BSC, Las Vegas, NV, M/S 280  
D. T. Krishna, BSC, Las Vegas, NV  
D. M. Kunihiro, BSC, Las Vegas, NV  
P. R. West-Thompson, BSC, Las Vegas, NV, M/S 280  
W. J. Glasser, NQS, Las Vegas, NV  
R. P. Hasson, NQS, Las Vegas, NV  
D. G. Opielowski, 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

NMSS07  
WM-11

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

ORIGINAL  
THIS IS A RED STAMP  
8.  DEFICIENCY REPORT  
 CORRECTIVE ACTION REPORT  
NO. OQA-01-D-146  
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**DEFICIENCY/CORRECTIVE ACTION REPORT**

1. Controlling Document: • QARD Rev 10 Eff Date 04/28/00 • AP-2.1Q Revision 1, ICN 0 Eff Date 06/30/00	2. Related Report No.: OQA-ARC-01-015
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3. Responsible Organization: Office of Quality Assurance (OQA)	4. Discussed With: R. D. Davis, J. Blaylock, R. Hasson
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5. Requirement:

- Quality Assurance Requirements and Description QARD Rev 10 Eff Date 04/28/00
- Procedure Indoctrination and Training of Personnel AP-2.1Q Revision 1, ICN 0 Eff Date 06/30/00

(Continued on page 2)

6. Description of Condition:  
Contrary to the above, complete individual training requirements and history were not retrievable from record storage and the training organization does not reflect the status of training for OQA.

- Individual training requirements could not be determined for five personnel in OQA (DOE personnel)
- DOE Individual Development Plans (IDPs) have not been submitted to the Training Organization (TO)
- Current training matrices could not be retrieved from the records organization or the training organization for three (of three sampled) OQA (Navarro) personnel

(Continued on page 2)

7. Initiator: T. L. Morgan Date 10/01/01 <i>T. L. Morgan</i>	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 Identified.

11. QA Review: QAR <i>Amelia R. West-Thompson</i> Date 10/24/01	12. Response Due Date: 10 Working Days From Issuance
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13. DDOA Issuance Approval:

Printed Name *ROBERT D DAVIS* Signature *James Blaylock* Date *10/25/01*

22. Corrective Actions Verified: QAR <i>[Signature]</i> Date <i>2/08/02</i>	23. Closure Approved by: DOE/OQA <i>[Signature]</i> Date <i>3/16/02</i>
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WASHINGTON, D.C.

8.  DR/CAR  
 Stop Work Order

NO. OQA-01-D-146

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**DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE**

5. Requirement: (continued)

QARD Subsection 2.2.13 *Qualification of Personnel Who Perform Inspection, Nondestructive Examination, Testing, and Auditing* states "Personnel who perform inspection, nondestructive examination, testing, and auditing shall be qualified in accordance with the requirements of the applicable QARD section covering the activity and QARD Subsection 2.2.12, *Personnel Qualification*"

Subsection 2.2.12.A. states "Each Affected Organization shall indoctrinate and train personnel as follows:

1. Determine required indoctrination and training."

4. "Ensure indoctrination and training are completed prior to performing the work."

17.2.1 *Classifying Quality Assurance Records*

Subsection 17.2.1.A states "Documents that meet the following requirements shall be classified as lifetime QA records:

7. "Personnel training and qualification documents for individuals executing QA program requirements."

AP-2.1Q Section 5.2 *Training Requirements Documentation*

5.4.1 *Manager:*

a) Ensure that indoctrination and training requirements, including those indoctrination and training requirements for ES&H and work subject to the QARD as determined in Subsection 5.1, are documented for each Employee or the Employee's job function. Document training requirements on an IDP or on a matrix that indicates Training Requirements against job functions, or employee.

c) Submit a copy of the IDP or Training Requirements Matrix to the TO.

5.4.2 *Employee*

b) Document completed indoctrination and training.... and ensure a copy is provided to the TO.

5.4.3 *TO:*

b) Submit completed training records and training exemption records in accordance with Section 6.0. [Records].

6. Description of Condition (continued):

- The training organization records do not show completion of required training for three (of three sampled) OQA (Navarro) personnel

QAS 1 (3590)

- Working File showed training matrix requirements for Manager should have been for a QAS
- TO showed two classes as having expired and retraining required.
- TO did not show two classes as being required that management had indicated as being required for initial job qualification.
- Records storage only showed a few completed classes, no matrix on file.

QAS 2 (2526)

- TO showed two classes as having expired and retraining required.
- TO did not show six classes as being required that management had indicated as being required for initial job qualification.
- TO showed one job function related/QA training requirement class as not having been completed
- Records storage only showed a few completed classes, no matrix on file.

QAS 3 (6989)

- TO showed one classes as having expired and retraining required.
- TO did not show fourteen classes as being required that management had indicated as being required for initial job qualification.
- TO showed three job function related/QA training requirement class as not having been completed
- Records storage only showed a few completed classes, no matrix on file.

TYPE RESPONSE:

- Complete
- Amended

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

14a. Immediate Actions:

None.

Compliance Date:

14. Remedial Actions:

1. Training matrices will be developed for OQA personnel, both DOE and NQS.
2. The training matrices will establish the training requirement for the position description.
3. Training to the matrices in (2) above will be completed by 2/1/02.

15. Extent of Condition:

OQA and NQS will review the existing training records and matrices to determine extent of condition.

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

To be determined in complete response.

17. Action to Preclude Recurrence:

To be determined in complete response.

18. Due Date: 1/15/02

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

19. Response by: James Blaylock

*James Blaylock* Date 11/30/01 Phone

20. Evaluation:  Accept  Partially Accept  Reject

QAR *[Signature]* Date 12/3/01

21. Concurrence:

DOQA *[Signature]* Date 12/11/01

Exhibit AP-16.1Q.1 PAM WEST-THOMPSON

Rev. 12/20/1999

Initial  
 Complete  
 Amended

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DR/CAR NO. OQA-01-D-146  
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**DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)**

14a. Immediate Actions:

NONE

Compliance Date: N/A

14. Remedial Actions:

See Initial Response

15. Extent of Condition:

Extent of Condition was limited to DOE/OQA and <sup>NQS</sup> ~~NSQ~~ <sup>8/1/02</sup> personnel addressed by corrective action. There was no impact since OQA personnel were already trained per the OQA matrix. Relative to NQS impact, no impact was identified since the Train Serve is a tool, not the official record of training.

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

The training for DOE/OQA was included in the Individual Development Plans. However, they were sent to DOE Headquarter Personnel rather than Training. HQ assumed YMSCO transmitted the IDPs to training, and YMSCO viewed this as a Headquarter responsibility. Hence, training had not received the IDPs for OQA personnel.

The QATSS matrix was received by Training as documented in a letter from Paul Turner, dated 9/25/01. Training had transmitted the Matrix to Records but it was for QATSS, not NQS. Therefore the an outdated organizational title was indicated on the Matrix, making it unrecognizable to the auditor.

The QATSS matrix and the NQS matrix contained training requirements that deviated from the BSC standard causing the Train Serve to inaccurately reflect training status for NQS personnel.

17. Action to Preclude Recurrence:

The Director of OQA has established training matrices, in place of IDPs, for OQA personnel and will transmit the matrices by 2/1/02 directly to training rather than relying on another DOE organization to submit the information.

A new NQS matrix will be transmitted to Training by 2/1/02 for submittal to Records.

18. Due Date: 2/1/02  
 For submittal of complete response  
 For completion of corrective action

19. Response by: James Blaylock  
 James Blaylock  
 Date 2/1/02      Phone 41420

20. Evaluation:  Accept     Partially Accept     Reject  
 OAR *[Signature]*      Date 3/4/02

21. Concurrence:  
 DOQA *[Signature]*      Date 3/16/02