



Department of Energy

Washington, DC 20585

QA: QA

APR 08 2002

M. G. McDaniel
Bechtel SAIC Company, LLC
1180 Town Center Drive, M/S 423
Las Vegas, NV 89144

ISSUANCE OF DEFICIENCY REPORT (DR) BSC-02-D-095 RESULTING FROM AN OBSERVATION BY KEN GILKERSON

Enclosed is DR BSC-02-D-095 generated as a result of an observation.

Please provide a response to this deficiency that meets the applicable requirements of Administrative Procedure (AP) 16.1Q, *Management of Conditions Adverse to Quality*. Send the original of your response to Deborah G. Opielowski, Navarro Quality Services, P.O. Box 364629, Mail Stop 455, North Las Vegas, Nevada 89036-8629. Initial response to the DR is due ten working days from the date of this letter. Any extensions to this due date must be requested in accordance with AP-16.1Q.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or James V. Voigt at (702) 794-1487.

James Blaylock
Ram Murthy, Acting Director
Office of Quality Assurance

OQA:JB-0971

Enclosure:
DR BSC-02-D-095



Printed with soy ink on recycled paper

*Nmsso7
wm-1*

APR 08 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
A. G. Burningham, BSC, Las Vegas, NV
K. O. Gilkerson, BSC, Las Vegas, NV, M/S 280
H. T. Greene, BSC, Las Vegas, NV, M/S 280
S. H. Horton, BSC, Las Vegas, NV
C. A. Humphries-Alder, BSC, Las Vegas, NV, M/S 280
R. P. Keele, BSC, Las Vegas, NV, M/S 280
D. T. Krisha, BSC, Las Vegas, NV
D. M. Kunihiro, BSC, Las Vegas, NV
J. S. Whitcraft, BSC, Las Vegas, NV
W. J. Glasser, NQS, Las Vegas, NV
J. V. Voigt, 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

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

ORIGINAL
DEFICIENCY REPORT
☒ DEFICIENCY REPORT
☐ CORRECTIVE ACTION
REPORT
NO. BSC-02-D-095
PAGE 1 OF
QA: QA

DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document:
QARD, DOE/RW-0333P R10

2. Related Report No.:
N/A

3. Responsible Organization:

BSC Engineering

4. Discussed With:

J. Whitcraft, A. Burningham, Cindy Humphries-Alder

5. Requirement:

- 1) QARD 2.2.1.B: Affected organizations shall establish implementing documents.. that translate QARD requirements into work processes.
- 2) QARD 6.2.6.C: Implementing documents shall define the method used to incorporate changes. If this defined method is other than reissue of the entire controlled document, the implementing documents shall define the maximum number of changes permitted prior to requiring reissue of the entire controlled document.
- 3) QARD 6.2.5.B: Effective dates shall be established for approving implementing documents.
- 4) QARD 6.2.5.D: A method shall be established to identify the current status of each document.

6. Description of Condition: 1) Contrary to the above requirements AP-2.21Q Revision 1 is inadequate in that it does not properly translate applicable QARD requirements into work processes.
Contrary to 1), 2) AP-2.21Q R-1 Section 5.7 prescribes the use of Addenda to add or update information to an existing approved Technical Work Plan (TWP) without "revising" the document. This adding/updating is a change. The procedure fails to identify the maximum number of such changes that can be done without a full revision (reissue) of the document. Nor is the process for *changing* the document by Addenda clearly defined in the procedure. It is not clear how the current status of the document is identified (i.e. a revision level designator is not clearly established in accordance with AP-6.1Q). See discussion below. Contrary to 1), 3), although the TWP cover sheet has a place on the form for an effective date, there is no process established in the procedure detailing how this date is determined, by whom and when. (continued)

7. Initiator:

Ken O. Gilkerson BSC QA

Date 03/22/02

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:

- 1) Incorporate QARD requirements.
- 2) Revise procedure to remove use of Addendums in revision process.
- 3) Clarify the revision/change process for TWPs.

11. QA Review:

QAR James V. VOIGT

Date 27 March 2002

12. Response Due Date:

10 Working Days From Issuance

13. DOQA Issuance Approval:
(Acting)

Printed Name Ram Murthy

Signature

James B. Baylock Jr.

Date 4/8/02

22. Corrective Actions Verified:

QAR

Date

23. Closure Approved by:

DOQA

Date

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

8. ☒ DR/CAR
☐ Stop Work Order
NO. BSC-02-D-095
PAGE 2 OF
QA: QA

DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Block 6 continued:

Contrary to 1), 4), Although the (TWP) procedure prescribes that Addenda be submitted to document control to be processed in accordance with AP-8.1Q, Document Control requires a status indicator for any change document (i.e. Revision 1, Interim Change Notice 1, etc.). Addenda are a mechanism to supplement information for a document without changing the existing format. This procedure attempts to use Addenda as both a supplement and a change indicator (i.e. Addendum F). Addenda are not status indicators. Most of the issued TWPs have an Addenda A & B as part of their structure. For example Rev 0 of a TWP includes and Addenda A (Activity Evaluation) and Addenda B (Sup V Process Control Evaluation). They appear in the controlled database as TWP-XXX-YY-ZZZZZZ R-0 with no notation of the Addenda A& B that are part of Revision 0. By later issuing an Addendum C (for example), there is no way to identify the current status of the document. If the TWP is depicted as TWP-XXX-YY-ZZZZZZ R-0 Addendum C, what happened to A & B as the first changes. They may already exist as part of Revision 0.

Discussion:

The AP-2.21Q inadequacies first surfaced fifteen months ago when BSC/M&O staff attempted to process TWP changes in accordance with the procedure. There have been few process problems as long as changes were incorporated to the TWP by using the full revision process depicted in the procedure. Problems have arisen when attempts to change a TWP by other means have occurred. Attempts to make interim changes by ICNs resulted in DR-02-D-008. ICNs are not a prescribed change mechanism for TWPs. Attempts to issue changes with addenda as *prescribed by the procedure* have resulted in confusion and difficulties. Document Control has rejected such attempts due to the lack of an adequate status designator to distinguish TWP versions. Continuing attempts by the line organization to *add* Addenda to TWPs without *revising* the documents have brought the programmatic issues to light once again. When the procedure owner was notified of these deficiencies last year, it was related that the procedure had numerous DARs against it and that the procedure was *being* revised and these issues would be addressed. The procedure is still *being* revised but there has been no resolution of these issues.

As an example, the recent OQA Audit of M&O/Headquarters (BSC-ARC-02-05) identified work at headquarters that was being conducted with an Addenda (to TWP-CRW-MD-000001 R-0) that had not been submitted to Document Control or Records. In response to the audit issue, BSC attempted to process the Addenda through Document Control without revising the TWP. Ultimately (on 03/11/02) BSC revised the TWP to Revision 1 to incorporate the Addenda. As another example, HQ submitted a stand alone Addenda D to update TWP-WAT-MD-000001R-0. This TWP had not been updated since November 2000. R-0, the initial of this TWP, already included Addenda A, B, & C.

103 3/26/02