



Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
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QA: N/A

APR 15 2002

OVERNIGHT MAIL

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**U.S. DEPARTMENT OF ENERGY (DOE), YUCCA MOUNTAIN SITE
CHARACTERIZATION OFFICE (YMSCO) RESPONSES TO 2001 QUALITY
ASSURANCE MANAGEMENT ASSESSMENT (QAMA) RECOMMENDATION**

The Fiscal Year 2001 QAMA Report of the Office of Civilian Radioactive Waste Management (OCRWM) was finalized on September 15, 2001, and issued to the YMSCO on October 24, 2001.

At the December 5, 2001, DOE/U.S. Nuclear Regulatory Commission (NRC) Quarterly Quality Assurance Meeting, it was agreed that DOE would provide to NRC the YMSCO response to the QAMA recommendations. A copy of the December 20, 2001, DOE memorandum transmitting the YMSCO responses (enclosure 1) to the QAMA recommendations, and the current status of YMSCO actions (enclosure 2) are enclosed for your information. The QAMA team has evaluated the YMSCO responses, and found that they adequately address the QAMA recommendations. Also, as you know, the Performance Improvement Transition Plan, referred to in the YMSCO responses, has been replaced by the OCRWM Management Improvements Initiatives (OMII). As discussed with the NRC staff, it should be noted that the OMII is being revised, and will address the QAMA recommendations, as well as other management and quality issues. The Bechtel SAIC Company, LLC specific responses have been provided to DOE for transmittal to the QAMA team.

If you have questions or need additional assistance regarding the YMSCO response to the QAMA recommendations, please contact Timothy C. Gunter at (702) 794-1343 or Catherine E. Hampton at (702) 794-1387.

Stephan Brocoum
Assistant Manager, Office of
Licensing and Regulatory Compliance

OL&RC: TCG-0588

Enclosures:

1. Ltr, 12/20/01, Dyer to Barrett, w/encl
2. QAMA Actions (2001)

APR 15 2002

cc w/encls:

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United States Government

Department of Energy

Memorandum

QA: N/A

DATE: DEC 20 2001

REPLY TO: YMSCO/PM (J. R. Dyer/702-794-1300)
ATTN OF:SUBJECT: RESPONSES TO RECOMMENDATIONS RESULTING FROM OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT FISCAL YEAR 2001 QUALITY ASSURANCE
MANAGEMENT ASSESSMENT

TO: RW-1 (L. H. Barrett)

Enclosed are the responses to the recommendations made in the Fiscal Year 2001 Quality Assurance Management Assessment report.

Should you have any questions regarding the enclosed responses, or their status, please contact Catherine E. Hampton at (702) 794-1387.



J. Russell Dyer
Project Manager

OPE:CEH-0338

Enclosure:
As stated

cc w/encl:

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ENCLOSURE 1

RECOMMENDATION 01-1

The Office of Civilian Radioactive Waste Management (OCRWM) senior management must play a key role in implementing an effective corrective action program on a high priority basis. OCRWM line managers must be held accountable for assuring that corrective actions in their area of responsibility are identified and implemented. Implementation of effective corrective actions should be a key element in each OCRWM manager's performance appraisal, and should be directly tied to Bechtel SAIC Company, LLC fee determination. OCRWM should establish metrics to ensure that problems are resolved in a timely way and that they do not recur. The lead for monitoring the corrective action program at the Yucca Mountain Site Characterization Project (YMP) should be assigned by the Project Manager to an organization other than Office of Quality Assurance (OQA), perhaps the Office of Project Execution.

Responsible Individual: J. Russell Dyer

Response: The DOE Project Manager will issue a policy statement by January 2002 defining his position relative to the corrective action process. The policy statement will direct that each U.S. Department of Energy (DOE) organization (Office of Project Control, Office of Institutional Affairs, Office of Information Management, Office of Project Support, Office of Project Execution, Office of Licensing and Regulatory Compliance) designate a Point of Contact for coordinating the resolution of YMP deficiencies and oversight of BSC deficiencies in their area of responsibility and that all organizations shall employ the use of the Deficiency Reports/Corrective Action Reports database. The policy will define the expectation that DOE line management are responsible for assuring timely closure of corrective actions and that assessments are conducted to assure that corrective actions on major deficiencies were effective. The policy will also state that DOE line management should be aware of the following: basis of the deficiencies under their purview; plan for resolution; schedule for completion; and potential impact on associated products.

The Project Manager will evaluate mechanisms in place (e.g., DOE Performance Appraisal Plans) for DOE senior and line managers to ensure that there is accountability for timely corrective action of YMP deficiencies as well as dedicated oversight of contractor corrective actions. The evaluation will be completed by February 2002. Based upon the results of the evaluation, a path forward will be defined and submitted to the Quality Assurance Management Assessment (QAMA) team by March 2002.

An evaluation will be performed to determine the extent to which the BSC fee is linked to effective and timely corrective actions. The evaluation will be completed by February 2002. Based upon the results of the evaluation, a path forward will be defined and submitted to the QAMA team by the end of February 2002.

Performance metrics related to quality-related deficiencies and nonconformances have been developed and are tracked on a monthly basis. This suite of indicators will be reviewed by the YMP corrective action lead and modified as necessary. This information will be disseminated to all organizational points of contact to assist with their oversight and monitoring responsibilities.

There is currently a staff member assigned responsibility for oversight of all YMP corrective actions. This individual currently reports within the Office of Project Execution. It is recognized that the QAMA team was recommending a shift in corrective action tracking, procedure ownership, etc. It was determined that these functions should remain with the Quality Assurance (QA) organization. However, due to an upcoming shift in QA responsibilities to the BSC QA department, BSC QA will now have responsibility for approval, tracking, verification, and closure of deficiencies initiated within BSC.

RECOMMENDATION 01-2

The YMP Project Manager should provide a single focus on improving human performance and enhancing professionalism rather than on discrete initiatives such as nuclear culture, integrated safety management, safety conscious work environment, etc. YMP management should rely on proven Institute of Power Operations (INPO) tools and guidance, including the use of self-assessments by the line organizations, on improving human performance and enhancing professionalism. YMP management should work with BSC management to develop a common message and themes for this initiative, define in the simplest possible terms the expectations for performance, and show strong commitment to improving human performance.

Responsible Individual: J. Russell Dyer

Response: Although the Nuclear Culture initiative realized progress, such as a more structured self-assessment program, a condition identification/resolution and tracking system, and several infrastructure improvements, it has been recognized that its overall progress was generally uncertain. Recent reviews of technical products and associated processes have resulted in recent significant conditions adverse to quality indicating certain repetitive, unresolved conditions.

DOE and BSC are in the process of developing a multi-year OCRWM Performance Improvement Transition Plan (PITP) designed to drive the project's transition to the level of performance and culture necessary to prepare for a potential U.S. Nuclear Regulatory Commission license to design and construct a repository. The objectives, as defined in the draft plan, include emphasis on quality, safety, project management, and human performance. The plan uses techniques confirmed effective for sustained improvement at other NRC-regulated facilities and specifically addresses recommendations identified by root cause analyses, self-assessments, the NRC, the Integrated Safety Management System assessment, the Quality Assurance Management Assessment, and the Safety Conscious Work Environment Final Report. To monitor implementation and measure progress, the plan will be accompanied by predefined performance measures and followed-up with wide-ranging assessments, as well as Quality Assurance performance and compliance based audits and surveillances of in-process work. Key individuals are assigned the responsibility to implement, monitor, and report progress and status for all actions identified in the PITP.

The PITP is currently in draft form but will be submitted to the QAMA team upon approval. A mandatory comment has been submitted requesting that the PITP team incorporate proven INPO tools and guidance in the final plan. A matrix will be prepared and provided to the QAMA team defining how the INPO guidance has been incorporated. This matrix will be provided thirty days

from the completion of the Performance Improvement Transition Plan approval, with a target date for delivery to the QAMA team by February 28, 2002. Implementation of the actions in the PITP will occur during the remainder of fiscal year 2002. The progress and status of these actions will be briefed to the QAMA team during the fiscal year 2002 QAMA.

RECOMMENDATION 01-3

YMP should establish a firm date for developing a management plan, approach, and organizational structure that aligns the authorities and roles and responsibilities of the YMP and BSC organizations. YMP and BSC managers should be involved in reaching and promptly implementing these decisions, and be held accountable for effective implementation. In evaluating how best to structure the YMP organization, and the roles, responsibilities and authorities, YMP should evaluate the structure of other successful government and private sector projects. As OCRWM's role and organization are defined, YMP should identify any required changes in staffing or skill mix, and set a date for implementing these changes.

Responsible Individual: Mark E. Van Der Puy

Response: DOE has recently completed an evaluation of the organizational structure, including an evaluation of skill mix necessary to support a post-Site Recommendation mission. During the course of the evaluation, benchmarking was completed against the United States Enrichment Corporation and the Bonneville Power Administration. A report was prepared by the Organizational Analysis and Development Integrated Product Team (IPT). The IPT was specifically chartered to analyze organizational needs to support the OCRWM vision, strategic goals, and objectives. The report was submitted to the Executive Leadership Team in November 2001 for their action.

RECOMMENDATION 01-4

YMP management should establish a firm milestone by which the project will have its technical, cost and schedule baseline in place. Responsibilities for this effort and management expectations regarding the level of detail contained in the baseline should be clearly communicated to OCRWM and BSC managers.

Responsible Individual: Victor W. Trebules

Response: The current Project Cost and Schedule baseline was established in 1995, and has been maintained by the project through its change control process. BSC is reexamining the License Application (LA) workscope and is developing an updated, integrated license application strategy. The updated strategy will impact the scheduled date for the LA and will necessitate a baseline change request that must be approved by YMP and then submitted to the Energy System Acquisition Advisory Board (ESAAB) for approval.

The YMP has established a milestone that by March 1, 2002, a formal Change Proposal (to rebaseline through LA) will be prepared by BSC and submitted to YMP. As part of the ESAAB approval process, DOE has plans in place to validate the program's rebaseline

effort through an external independent review conducted by the Office of Engineering and Construction Management. Once ESAAB approves the change proposal, a new LA cost and schedule baseline will be formally established.

During the FY 03 planning cycle, which begins in March 2002, the cost and schedule baselines through "Receipt of Waste" will be formally established. Management expectations regarding the level of detail contained in the baseline will be communicated to BSC as a part of the planning process. The contractor will submit their detailed work plan for this phase of the project to YMP by September 30, 2002.

RECOMMENDATION 01-5

YMP management should set a firm date for reviewing and revising project procedures to assure that they are adequate and effective for the NRC licensing phase of the project. Any initiative to revise the procedures should be built around the processes and outputs from the project, rather than just on the existing set of project procedures.

Responsible Individual: Victor W. Trebules

Response: The DOE PM has transferred this recommendation to BSC. It will be included with the BSC recommendations and BSC will provide a response outlining a path forward to the QAMA team. Ninety-five percent of product procedures are owned by BSC. Procedures needed for License Application will be primarily rooted in the technical (design) arena. It is DOE's understanding that BSC has performed the evaluation of procedural needs in licensing. As such, BSC will be better suited to delineating a schedule for completion.

RECOMMENDATION 01-6

YMP management should establish a firm date by which an effective commitment management system will be in place, should specify in writing the performance expectations for the system, and then evaluate periodically whether the system is meeting these expectations.

Responsible Individual: Stephan Brocoum

Response: In October 2001, DOE transmitted a Technical Direction letter to BSC defining concerns and identifying management expectations with regard to the Commitment Management process. DOE requested that BSC provide a plan of action within thirty days. BSC has provided an action plan in response to the Technical Direction letter. The plan details actions that will be taken, including procedure review, review and incorporation of backlog, and evaluation regarding the capture of lower level NRC actions. As currently defined, the implementation of the action plan will be completed in February 2002. The Office of Licensing and Regulatory Compliance has designated a point of contact to ensure effective implementation per the plan and to evaluate continued performance.

A copy of the plan will be provided to the QAMA team by February 2002. In addition, information will be provided to the QAMA team when available, that documents completion of the action items outlined in the plan.

QAMA ACTIONS - 2001

RECOMM. #	ACTION ITEM	DUE DATE	RI	STATUS
01-1-A	Issue a policy statement from the PM defining his position on the corrective action process.	1/31/02	Dyer	The policy has been drafted and submitted to management for consideration.
01-1-B	PM will evaluate mechanisms in place for managers to ensure there is accountability for timely corrective actions.	2/28/02	Dyer	Complete - SES and Director performance standards have been evaluated (see 01-1-C).
01-1-C	Based on the results of the evaluation above, a path forward will be defined and submitted to the QAMA team.	3/31/02	Dyer	Complete - It was determined that performance standards are sufficient to ensure that managers are evaluated for the accountability of timely corrective actions.
01-1-D	Perform an evaluation to determine the extent to which the BSC fee is linked to effective corrective actions.	2/28/02	Dyer	Complete - The PEMP (for performance period 4/01 through 3/06) has been reviewed (see 01-1-E).
01-1-E	Based on the results of the evaluation above, a path forward will be defined and submitted to the QAMA team.	2/28/02	Dyer	Complete - It was determined that the correlation between BSC fee and the resolution of corrective actions is sufficient.

QAMA ACTIONS - 2001

RECOMM. #	ACTION ITEM	DUE DATE	RI	STATUS
01-1-F	Performance indicators related to DRs and NCRs will be modified as necessary, and disseminated to all organizational POCs.	Open	Dyer	
01-2-A	Ensure the INPO tools and guidance have been incorporated into the plan.	Open	Dyer	Complete – Reference to INPO tools and guidance has been added to the OMII.
01-2-B	Submit the final OMII to the QAMA team upon approval.	Upon approval of the OMII	Dyer	Complete – The OMII was sent to the QAMA team on 2/21/02. Any revisions to the OMII will be provided to the QAMA team.
01-2-C	Prepare a matrix that defines how the INPO guidance has been incorporated into the OMII and provide the matrix to the QAMA team.	30 days after completion of the OMII (target date of 2/28/02)	Dyer	The matrix will be prepared in accordance with the new construct of the OMII. As approved, the OMII delineates a series of actions. INPO guidance will be considered in the development and completion of the action steps. The matrix will be discussed with the QAMA team in July.
01-3	Conduct an evaluation of the DOE organizational structure, including an evaluation of skill mix necessary to support a post-SR mission.	Open	VanDerPuy	Complete – The evaluation has been completed and the resulting report was submitted to the Executive Leadership Team for their action.
01-4-A	BSC will prepare a formal change proposal to re-baseline through LA.	3/1/02	Trebules	Complete - The Change Proposal (Plan B) was submitted to YMSCO on 3/1/02.

QAMA ACTIONS - 2001

RECOMM. #	ACTION ITEM	DUE DATE	RI	STATUS
01-4-B	Validate the Program's re-baseline through an external independent review.	Open	Trebules	
01-4-C	Establish a new LA cost and schedule baseline.	Once ESAAB approves the change proposal	Trebules	
01-4-D	Formally establish the cost and schedule baseline through the receipt of waste.	9/30/02	Trebules	
01-5	Transfer this recommendation of BSC.	Open	Trebules	Complete – This is now Recommendation #10 for BSC.
01-6-A	Provide a copy of the commitment management action plan to the QAMA team.	2/28/02	Brocoum	Complete – The action plan was sent to the QAMA team on 2/28/02.
01-6-B	Provide periodic information to the QAMA team that documents completion of the action items outlined in the plan.	When available	Brocoum	