



## Department of Energy

Washington, DC 20585

QA: QA

APR 17 2002

M. T. Peters  
Bechtel SAIC Company, LLC  
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Las Vegas, NV 89144

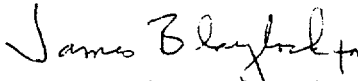
VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT  
(DR) BSC-02-D-047 RESULTING FROM THE OFFICE OF QUALITY ASSURANCE (OQA)  
AUDIT BSC-ARC-02-03

The OQA staff has evaluated the corrective action of DR BSC-02-D-047 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 Christian M. Palay at (702) 794-1486.

OQA:JB-1036

Enclosure:  
DR BSC-02-D-047

  
Ram Murthy, Acting Director  
Office of Quality Assurance



Printed with soy ink on recycled paper

*Nms507*  
*2/11*

APR 17 2002

cc w/encl:

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D. G. Opielowski, NQS, Las Vegas, NV  
C. M. Palay, NQS, Las Vegas, NV  
J. R. Dyer, DOE/YMSCO, 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-02-D-047  
PAGE 1 OF  
QA: QA

DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document:  
LP-1.0Q-M&O, Revision 0, ICN 0, Organization

2. Related Report No.:  
BSC-ARC-02-03

3. Responsible Organization:  
BSC

4. Discussed With:  
Mark T. Peters, Kenneth O. Gilkerson, Christopher C. Lewis

5. Requirement:

5.2 Delegation of Work, states in part:

"Managers may delegate authority-performing work subject to QARD requirements to another qualified individual or organization. However, the manager making the delegation shall retain overall responsibility for the delegated work. If this delegation is exercised, the delegating manager:

- a) Documents delegation of work subject to QARD requirements by issuing signed documentation (such as interoffice correspondence, electronic mail, or letter) specifying conditions of the delegation."

6.1 QA Records, states in part:

"Individual Records:  
Documented delegations of authority"

6. Description of Condition:

Contrary to the above requirement, five delegations of authority documents (see continuation page) had been incorrectly classified as QA: N/A records. These five delegation documents were discovered during the compliance audit of the Sample Management Facility.

During the audit, it was discovered that Calibration Data Sheet for a piece of Measuring and Test Equipment (M&TE). This Calibration Data Sheet for M&TE item 1000069 (the unique SMF barcode identifier). The Calibration Data Sheet was to require per procedure the Responsible Manager Approval Signature. For 1000069, a delegated individual approved the Calibration Data Sheet. When the delegation e-mail was reviewed, the incorrect classification of the records was discovered.

7. Initiator: Christian Palay

*Chris Palay*

Date 12/14/2001

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. Evaluate the process of how delegations of authority are authenticated as QA records.
2. The extent of condition investigation should develop a sufficient level of confidence in other BSC departments relative to the QA classification of delegation documents.

11. QA Review: Christian Palay

QAR

*Chris Palay*

Date 12/14/01

12. Response Due Date:

10 Working Days From Issuance

13. DOQA Issuance Approval:

Printed Name RAM MURTHY

Signature

*James Blaylock*

Date 1/3/02

22. Corrective Actions Verified:

QAR

*Chris Palay*

Date

C.R. 4-9-02

02/04/02

23. Closure Approved by:

DOQA

*James Blaylock*

Date

4/17/02

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8. ☒ DR/CAR  
☐ Stop Work Order

NO. BSC-02-D-047

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

6. Description of Condition: <continuation from page 1>

The following is a list of incorrectly classified delegation documents:

1. TRW Interoffice Correspondence (LV.SM&DD.CCL.06/00-83) dated June 19, 2000, from C.C. Lewis to Kris Scroggins.
2. TRW Interoffice Correspondence (LV.SM&DD.CCL.08/00-84) dated August 14, 2000, from C.C. Lewis to Claude Scroggins.
3. TRW Interoffice Correspondence (LV.SM&DD.CCL.12/00-85) dated December 21, 2000, from C.C. Lewis to Claude Scroggins.
4. Electronic Mail Delegation dated 06/04/2001 10:57 AM, sent by Brenda McGonigle (SMF Admin. Assistant) on behalf of Christopher C. Lewis, SMF Responsible Manager.
5. Electronic Mail Delegation dated 06/26/2001 11:18 AM, sent by Brenda McGonigle (SMF Admin. Assistant) on behalf of Christopher C. Lewis, SMF Responsible Manager.

## TYPE RESPONSE:

- ☒ Initial  
☐ Complete  
☐ Amended

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

## 14a. Immediate Actions:

All managers and leads within Science & Engineering Testing Project (S&ET) will be informed of the correct process via email by January 24, 2002.

Compliance Date: January 24, 2002

## 14. Remedial Actions:

The eight Sample Management Facility (SMF) delegations of authority found to be QA:NA during the audit were reclassified and resubmitted to records on 12/13/01.

All delegations of authority within S&ET, completed since 6/30/1999, will be reviewed. Those found to be QA:NA will be reclassified as QA:QA and resubmitted to records by February 28, 2002. This will be initiated with an email to all managers and leads within S&ET by January 24, 2002.

## 15. Extent of Condition:

There were eight delegations of authority in SMF found to be QA:NA (although only two were related to quality-affecting work). All groups within S&ET will be evaluated for this condition, and, if found, the condition will be remedied in the same manner. Since the condition was promptly identified and letters of delegation will be reclassified as QA:QA and resubmitted to records, there is no negative impact as a result of this deficiency.

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

~~The cause of this deficiency was a lack of understanding of the required classification of letters of delegation.~~

*www 1/17/02*

## 17. Action to Preclude Recurrence:

~~All managers and leads within S&ET will be informed of the correct process via email by January 24, 2002.~~ *www 1/17/02*

~~The BSC Lessons Learned Coordinator will be informed of the situation via email by February 28, 2002.~~ *www 1/17/02*

## 18. Due Date: February 28, 2002

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

## 19. Response by: Mark Peters (Chris Lewis-responsible individual)

*Mark Peters* *MTP for CL 1/17/02 www 1/17/02*  
Date: January 17, 2002 Phone: 5-6105 *BSC GR 1/17/02*

20. Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject

QAP

Date 01/31/02

## 21. Concurrence:

D00A

*James Blaylock*

Date 1/23/01

## TYPE RESPONSE:

- ☒ Initial  
☐ Complete  
☒ Amended

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QA: QA

## DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)

## 14a. Immediate Actions:

N/A

Compliance Date: N/A

## 14. Remedial Actions:

The eight Sample Management Facility (SMF) delegations of authority found to be QA:NA during the audit were reclassified as QA:QA and resubmitted to records on 12/13/01.

Remedial actions for extent of condition not yet researched will be addressed in the complete response.

## 15. Extent of Condition:

There were eight delegations of authority in SMF found to be QA:NA. Nine additional letters of delegation of authority, developed within Science and Engineering Testing (S&ET), were evaluated for this condition, and three were found to have been mistakenly classified as QA:NA. This led to the conclusion that the deficiency was not an isolated incident and, therefore, the condition will be evaluated further.

A search of the project records system will be performed in order to determine the full extent of condition of this deficiency. The search will be limited to delegations of authority meeting the following criteria:

- Developed since 2/12/02,
- Developed within the BSC management structure, and
- Found using the words "delegation of authority" in the RIS search engine.

Records found classified as other than QA:QA will be printed out and evaluated for further action (to be detailed in complete response).

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

Will be addressed in complete response.

## 17. Action to Preclude Recurrence:

Will be addressed in complete response.

## 18. Due Date: March 31, 2002

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

## 19. Response by: Mark Peters

Prepared by: Sherlie Rudinski

Mark Peters 2/27/02

RR 2-27-02

Date: February 27, 2002

Phone: 5-6105

20. Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject

## 21. Concurrence:

QAR

Chris Palay

Date 03-07-02

DOQA

James Blaylock

Date 3/8/02

Submittal Page 1 of 2

2. Check if Amended ☐  
 Check if also Initial Response ☐  
 3. Extended Processing  
☒ No ☐ Yes (If yes, submit  
 Extended Processing request)

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**DEFICIENCY REPORT/CORRECTIVE ACTION REPORT COMPLETE RESPONSE**

4. Extent of Condition: (Amended response will be required if all Extent of Condition investigations are not complete and documented herein)

On 2/27/02, the Records Department performed a search of BSC delegations of authority in the records system, developed after 2/11/01 (BSC transition) through present. 682 records were found during the search for records designated QA:QA. 127 records were found during the search for records designated as QA:N/A. Following is the disposition of those 127 records:

Forty Eight (48) had already been redesignated QA:QA.

Four (4) were not authorized for quality-affecting signature authority, and can remain QA:N/A.

Ten (10) were forwarded delegation of authority emails (not the original email), and can remain QA:N/A.

(See Addendum 1)

5. Impact: (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)

There is no impact because the documents were redesignated and resubmitted to Records before those labeled as "QA:N/A" could be purged from the Records system.

6. Remedial Actions: (Document all actions necessary to address the results of the Extent of Condition)

The eight Sample Management Facility (SMF) delegations of authority found to be QA:NA during the audit (and identified in the deficiency report) were reclassified as QA:QA and resubmitted to records on 12/13/01.

The delegations of authority incorrectly designated as QA:NA found during the investigation documented below (see Extent of Condition) were redesignated QA:QA and resubmitted to records.

7. ☐ Root Cause (For a significant CAQ, attach results of formal root cause determination prepared in accordance with AP-16.4Q)  
☒ Apparent Cause

The cause of this deficiency was a misunderstanding among some managers, supervisors, and administrative assistants, of the QA classification requirements associated with delegations of authority.

8. Action to Preclude Recurrence: (Address those actions necessary to prevent the identified cause from recurring)

On 3/5/02, all BSC administrative assistants were given guidance, via email, on the proper development of delegations of authority. On 3/14/02, all BSC administrative assistants, managers, and supervisors were reminded via "BSC Management Today" that delegations of authority for quality-affecting work are to be designated QA:QA.

9. Due Date for Completion of Corrective Action:

04/01/2002

10. Responsible Manager:

Mark T. Peters Mark Peters 4/1/02  
 Printed Name Signature Date

11. QAR Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject

Christian Palay Chris Palay 04/04/02  
 Printed Name Signature Date

12. QAM Concurrence:

ZAM MURPHY James B. Murphy 4/10/02  
 Printed Name Signature Date

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☒ DR/CAR/QO  
☐ SWO

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                    QA: QA

**CONDITION ADVERSE TO QUALITY CONTINUATION PAGE**

(Addendum 1)

Continued from Block 4:

Sixty Five (65) were redesignated QA:QA as part of the corrective actions of this deficiency report.

No BSC delegations of authority developed between 2/27/02 (the date of the initial search) and 3/14/02 (the date of the action to preclude recurrence) were found to be classified incorrectly.



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☒ DR/CAR/QO  
☐ SWO

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QA: QA**CONDITION ADVERSE TO QUALITY CONTINUATION PAGE**

## Verification of Corrective Actions for Deficiency Report (DR) BSC-02-D-047

The complete response outlined corrective actions requiring verification for the following:

## 4. Extent of Condition:

There were 65 records found that required remedial actions. The listing of the extent of condition is attached to this verification document (see submittal pages 2, 3, and 4).

## 6. Remedial Actions:

The remedial actions involved correcting the records per AP-17.1Q for those 65 delegation document<sup>S</sup> incorrectly classified as QA: N/A. The record packages of the corrected designations were verified to be complete. <sup>\$4/17/02</sup>

## 8. Actions to Preclude Recurrence:

To preclude this condition adverse to quality from recurring, BSC issued guidance via electronic mail (see submittal pages 5 and 6) to all BSC Administrative Assistants on properly classifying delegations of authority documents. Additionally, BSC managers, and supervisors were reminded via "BSC Management Today" (see submittal page 7) that delegation of authority documents for quality-affecting work are to be designated "QA: QA". The electronic guidance and reminder is satisfactory.

Based on the above evaluation, the QAR recommends closure of DR BSC-02-D-047.

Chris Palay      04/09/02  
QAR Signature      Date

NOT BSC	HQO.20010227.0079
NOT BSC	HQO.20010507.0012
NOT BSC	HQO.20010508.0007
NOT BSC	HQO.20010508.0008
NOT BSC	HQO.20010508.0009
NOT BSC	HQO.20010702.0005
NOT BSC	HQO.20010718.0011
NOT BSC	HQO.20010718.0014
NOT BSC	HQO.20010718.0015
NOT BSC	HQO.20010718.0018
NOT BSC	HQO.20011109.0015
NOT BSC	HQO.20011115.0021
NOT BSC	HQO.20011127.0008
NOT BSC	HQO.20011127.0014
NOT BSC	HQO.20011127.0018
NOT BSC	HQO.20011127.0021
NOT BSC	HQO.20011212.0001
NOT BSC	HQO.20011212.0003
NOT BSC	HQO.20011212.0004
NOT BSC	HQO.20011212.0019
NOT BSC	HQO.20011212.0021
NOT BSC	HQO.20020221.0009
QA	MOL.20010326.0323
QA	MOL.20010326.0324
QA	MOL.20010326.0325
QA	MOL.20010402.0325
QA	MOL.20010406.0361
QA	MOL.20010410.0258
I	MOL.20010411.0344
I	MOL.20010419.0341
I	MOL.20010419.0382
I	MOL.20010419.0384
I	MOL.20010501.0255
I	MOL.20010504.0566
QA	MOL.20010504.0578
QA	MOL.20010504.0579
I	MOL.20010510.0393
I	MOL.20010518.0245
I	MOL.20010607.0162
I	MOL.20010614.0513
I	MOL.20010619.0404
I	MOL.20010621.0195
I	MOL.20010622.0019
I	MOL.20010622.0099
NO	MOL.20010703.0125
I	MOL.20010703.0375
QA	MOL.20010717.0117
I	MOL.20010723.0005
QA	MOL.20010723.0061
I	MOL.20010724.0033
NO	MOL.20010724.0040
I	MOL.20010725.0016
I	MOL.20010807.0045
QA	MOL.20010808.0171
QA	MOL.20010808.0172

QA	MOL.20010808.0343	I
QA	MOL.20010808.0344	✓
QA	MOL.20010808.0345	
QA	MOL.20010808.0348	
QA	MOL.20010808.0353	
QA	MOL.20010808.0354	
QA	MOL.20010808.0396	
QA	MOL.20010809.0055	✓
I	MOL.20010809.0220	✓
I	MOL.20010810.0082	✓
NO	MOL.20010813.0171	
NA	MOL.20010815.0278	✓
I	MOL.20010816.0111	✓
I	MOL.20010816.0156	✓
I	MOL.20010817.0199	✓
I	MOL.20010817.0330	✓
QA	MOL.20010817.0365	
I	MOL.20010822.0164	✓
NA	MOL.20010822.0457	
NO	MOL.20010830.0036	
QA	MOL.20010830.0037	
QA	MOL.20010830.0038	
QA	MOL.20010830.0039	
QA	MOL.20010830.0040	
QA	MOL.20010830.0041	
QA	MOL.20010830.0042	
QA	MOL.20010830.0043	✓
I	MOL.20010830.0044	✓
I	MOL.20010831.0002	✓
I	MOL.20010831.0006	✓
I	MOL.20010910.0312	✓
QA	MOL.20010912.0272	
I	MOL.20010914.0079	✓
QA	MOL.20010917.0240	
I	MOL.20011001.0230	✓
I	MOL.20011002.0736	✓
I	MOL.20011002.0809	✓
I	MOL.20011002.0810	✓
NO	MOL.20011002.0811	
QA	MOL.20011002.0812	✓
I	MOL.20011002.0910	✓
NO	MOL.20011002.0913	
I	MOL.20011003.0067	✓
I	MOL.20011011.0467	✓
I	MOL.20011017.0213	✓
QA	MOL.20011017.0214	✓
I	MOL.20011023.0470	✓
I	MOL.20011025.0002	✓
QA	MOL.20011025.0003	
NA	MOL.20011025.0048	
QA	MOL.20011029.0250	✓
I	MOL.20011031.0085	✓
QA	MOL.20011031.0235	
QA	MOL.20011031.0236	
QA	MOL.20011031.0237	

I	MOL.20011101.0132	45 ✓
QA	MOL.20011101.0156	
I	MOL.20011105.0273	46 ✓
I	MOL.20011106.0241	47 ✓
QA	MOL.20011106.0244	
QA	MOL.20011109.0048	
NA	MOL.20011119.0353	
I	MOL.20011121.0241	48 ✓
I	MOL.20011126.0043	49 ✓
I	MOL.20011126.0126	50 ✓
I	MOL.20011129.0234	51 ✓
I	MOL.20011205.0245	52 ✓
I	MOL.20011206.0272	53 ✓
I	MOL.20011206.0417	54 ✓
QA	MOL.20011207.0102	
I	MOL.20011212.0251	55 ✓
I	MOL.20020104.0253	56 ✓
I	MOL.20020108.0107	57 ✓
QA	MOL.20020117.0224	
QA	MOL.20020117.0225	
I	MOL.20020122.0062	58 ✓
NO	MOL.20020122.0215	
NO	MOL.20020122.0216	
QA	MOL.20020122.0366	
NO	MOL.20020126.0066	
QA	MOL.20020126.0091	
I	MOL.20020130.0045	59 ✓
NO	MOL.20020130.0048	
QA	MOL.20020130.0057	
I	MOL.20020206.0279	60 ✓
I	MOL.20020206.0281	61 ✓
QA	MOL.20020214.0217	
I	MOL.20020214.0218	62 ✓
I	MOL.20020214.0262	63 ✓
QA	MOL.20020219.0026	
I	MOL.20020222.0225	64 ✓
I	MOL.20020222.0226	65 ✓
QA	MOL.20020227.0022	
NOT BSC	MOV.20011217.0011	
NOT BSC	MOV.20011217.0012	
NOT BSC	MOV.20011217.0013	
QA	MOV.20020102.0001	

65 I=Redesignated QA:QA as part of the corrective actions of this deficiency report.

48 QA=already been redesignated QA:QA.

4 NA=not authorized for quality-affecting signature authority, and can remain QA:N/A

10 NO=forwarded delegation of authority emails (not the original email), and can remain QA:N/A.

127 TOTAL BSC (sum of above)

25 NOT BSC

152 TOTAL ON THIS LIST

Submittal ~~pg~~ Page 5 of 7  
c.p.  
4-9-02

 Sandra Trillo 03/07/2002 08:47 AM

To: Shellie Rucinski/YM/RWDOE@CRWMS  
cc:

Subject: Delegation of Authority Guidance

QA:N/A Exclusionary

Shellie,

I already sent this out to the administrative staff a couple of days ago. My attachment is the same one as Dennis sent to you in his message. You can view the BSC All Admins list in the CRWMS Address Book directory to see exactly who received my message.

If you want to get this into BSC Today, you should contact someone in Communications, either Mary Nichols or Susan Watson would be a good contact.

Hope this helps.

Sandra

----- Forwarded by Sandra Trillo/YM/RWDOE on 03/07/2002 08:38 AM -----

 Sandra Trillo 03/05/2002 11:12 AM

To: BSC All Admins  
cc: Melinda D'Ouville/YM/RWDOE@CRWMS, Dennis Sorensen/YM/RWDOE@CRWMS

Subject: Delegation of Authority Guidance

QA:N/A Exclusionary

Please read the attached file for guidance on creating a Delegation of Authority. The most important point to remember is that a delegation is a federal record and must be designated as Inclusionary and QA:QA.



Delegation of Authori

Approval was obtained from the Computer Support Center prior to using the address group in the "TO" line above. In the interest of managing disk space on the Lotus Notes servers, please discard this message when you have finished reading it.

### Delegation of Authority Memo

When a manager is planning on being out of the office for one day or more, for either business or personal reasons, then he/she needs to delegate authority in accordance with LP-1.0Q, sections 5.2 and 6.0, to another staff member. The delegation should indicate the length of time of the manager's absence and any restrictions associated with the delegation. For instance, the manager may be authorized to approve a purchase requisition for \$50,000, but the person to whom authority is delegated may only have approval up to \$10,000. A delegation memo does not increase the dollar value of a person's approval limit.

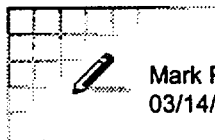
Suggested wording would be:

*I will be out of the office on business travel from Monday, September 17, through Wednesday, September 19, 2001. During my absence, I am delegating authority to John E. Smith. This delegation includes signature authority in all matters except those prohibited by company policy.*

The recommended method of sending a delegation memo is via e-mail. Two important notes: (1) Typically, administrative support staff sends out the e-mail; this should be sent from the manager's e-mail account, rather than the administrative support person's account; (2) The "QA and Inclusionary" box must be checked to ensure that the memo is captured by the Records Processing Center.

Distribution should be limited, but include:

- The person to whom the manager is delegating authority.
- Other staff who report directly to the manager who is delegating authority.
- The manager's supervisor and any other senior managers with whom he/she works on a daily basis.
- Other administrative support personnel, as appropriate.



Mark Peters  
03/14/2002 09:48 AM

To: Shellie Rucinski/YM/RWDOE@CRWMS  
cc:

Subject: Message from Dennis Sorensen regarding letters of delegation of authority

QA:N/A Exclusionary

FYI.

----- Forwarded by Mark Peters/YM/RWDOE on 03/14/2002 09:50 AM -----



BSC Management Today  
03/14/2002 09:27 AM

Sent by: Mary Nichols

To: BSC Management, BSC Managers & Supervisors  
cc: BSC All Admins

Subject: Message from Dennis Sorensen regarding letters of delegation of authority

QA:N/A Exclusionary

Because of a recent deficiency report, BSC-02-D-047, it is necessary to remind everyone who delegates signature authority that, if the signature authority is for **quality-affecting work**, the letter of delegation of authority must be designated **QA:QA**. Deficiency report BSC-02-D-047 was issued to BSC because of a failure to comply with this requirement.

If you would like to read more about this process, please refer to LP-1.0Q-M&O, Revision 0, ICN 0, *Organization*, which delineates requirements for delegations of authority (See Sections 5.2, *Delegation of Work*, and Section 6.1, *QA Records*).