Department of Energy
Washington, DC 20585

QA: QA

MAY 08 2002

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

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT (DR) BSC-02-D-068

The OQA staff has evaluated the corrective action of DR BSC-02-D-068 and determined the result 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 Donald J. Harris at (702) 794-1467.

James Blaylock for
Ram B. Murthy, Acting Director
Office of Quality Assurance

OQA:JB-1157

Enclosure:
DR BSC-02-D-068

WM-11

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
James Hollins, BSC/LANL, Las Vegas, NV
R. W. Andrews, BSC, Las Vegas, NV
G. K. Beall, BSC, Las Vegas, NV
S. H. Horton, BSC, Las Vegas, NV
R. P. Keele, BSC, Las Vegas, NV, M/S 280
D. T. Krisha, BSC, Las Vegas, NV
D. M. Kunihiro, BSC, Las Vegas, NV
T. J. Wall, BSC, Las Vegas, NV
R. L. Weeks, BSC, Las Vegas, NV, M/S 280
N. H. Williams, BSC, Las Vegas, NV
J. R. Doyle, NQS, Las Vegas, NV
W. J. Glasser, NQS, Las Vegas, NV
K. A. Hodges, 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
S. P. Mellington, DOE/YMSCO, Las Vegas, NV
J. M. Replogle, DOE/YMSCO, Las Vegas, NV
B. M. Terrell, DOE/YMSCO, Las Vegas, NV

ORIGINAL

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

8. ☑ DEFICIENCY REPORT ☐ CORRECTIVE ACTION REPORT
NO. BSC-02-D-068
PAGE 1 OF 2 D60 1/28/02
QA: K QA

DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document: AP-SIII.7Q Revision 0 ICN 0 SCIENTIFIC INVESTIGATION LABORATORY AND FIELD TESTING	2. Related Report No.: N/A
3. Responsible Organization: BSC Science and Engineering Testing Project	4. Discussed With: Robert Andrews, William Watson, Kenneth Gilkerson

5. Requirement:
2.0 APPLICABILITY
This procedure applies to the Office of Civilian Radioactive Waste Management (OCRWM) and its Affected Organizations who conduct and document testing activities in support of the OCRWM Program at any designated location.
Scientific investigation testing initiated prior to the effective date of this procedure is exempted from the requirements of this procedure for a period of 120 days from the effective data of this procedure.
Section 5.3.1 BSC S&ET:
a) Evaluate pre-test predictions and test plans, approve the test plan by signature and date, and authorize the start of tests in accordance with checklist(s).
b) Ensure a copy of the authorized test plan is sent to the Records Processing Center.
c) Ensure the test plan is distributed in accordance with the requirements of AP-6.1Q, Controlled Distribution.

6. Description of Condition:
1. A list of tests that require test plans was issued by BSC S&ET. Some test plans covering testing that was initiated prior to the effective date of AP-SIII.7Q were not completed and testing authorized within the 120 day exemption period in Section 2.0. Test Plans have been drafted but have have not yet comleted the AP-2.14Q review cycle.

Refer to attached E-mail dated 01/31/02, K. Gilkerson to D. Harris for examples of the deficiency. dgk 01/31/02

7. Initiator: Mark T. Peters, Science and Engineering Testing Project — Date 1/14/02	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:
"NONE" dgk 1/29/02

11. QA Review: QAR Donald J Harris Date 1-29-02	12. Response Due Date: 10 working days from issuance

13. DOQA Issuance Approval:
Printed Name Ram Murthy Signature James Blaylock Date 2/6/02

22. Corrective Actions Verified: QAR Donald J Harris Date 5-2-02	23. Closure Approved by: DOQA James Blaylock Date 5/7/02

ENCLOSURE 1 of 10

Kenneth Gilkerson
01/31/2002 01:24 PM

To: Don Harris/YD/RWDOE@CRWMS
cc: Larry Abernathy/YM/RWDOE@CRWMS, Roger Henning/YM/RWDOE@CRWMS

Subject: DR BSC-02-D-068

QA:QA Inclusionary

Please attach this e-mail to subject DR to document examples of the condition cited. While BSC intends to document all SITP's that did not meet the 120 day administrative rquirement in the "Extent of Condition", it should be noted that some of the subject SITP's were approved shortly after the 120 day "drop dead" date and others have yet to complete the AP-2.14Q process. For example SITP-02-EBS-003 "Field Conductivity Testing" was an ongoing test that was recently approved and issued, but just after the 120 day date. On the other hand, on-going tests (CSNF Colloid Release Testing) at PNNL were documented in SITP-02-WF-008 but this SITP has not yet been approved. Similarly long term testing at ANL have been ongoing but the SITP's are still in comment resolution; i.e. SITP-02-WF-002, "DHLW Degradation and Radionuclide Release in Long Term Tests" and SITP-02-WF-001"Commercial Spent Fuel and Fuel Rod Segment Degradation and Radionuclide Release in Long Term Tests". The exact tests, predictive analyses and impacts (if any) will be detailed in the BSC response to this DR in the extent of condition. It should also be noted that all of these on-going tests were covered under the AP-2.21Q Planning processes that existed prior to AP-SIII.7Q being a procedural requirements document. Subsequently, it is BSC's initial belief that there is no real impact on data/product for not meeting the arbitrarily established administrative requirement of 120 days to get Test Plans in place. This DR is to document the procedural noncompliance and produce a plan of action for these tests.

TYPE RESPONSE:
☒ Initial
☒ Complete
☐ Amended

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

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DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)

14a. Immediate Actions:

N/A

Compliance Date:

14. Remedial Actions:

All test plans required by AP-SIII.7Q for work that has already begun will be developed, approved, and submitted for controlled distribution and records processing according to AP-SIII.7Q. Those that fall into this category are documented below in Block 15.

15. Extent of Condition:

Continued on next page.

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

1. Lack of understanding regarding the effort that it would take to develop and process the AP-SIII.7Q test plans. This was due to the fact that this is a new procedure and hasn't been used before.
2. Lack of understanding regarding the level of detail and criteria that needed to be included and reviewed as part of the AP-2.14Q review process required by AP-SIII.7Q.
3. Seven of the eight incomplete test plans were for testing at Qualified Supplier National Labs, ANL and PNNL, rather than "teammate" labs. This was caused by a lack of ability to require Qualified Supplier National Labs to perform work outside of their approved Statement of Work. These labs had task plans and test plans as part of their subcontracts.

17. Action to Preclude Recurrence:

1. S&ET will hold a teleconference with the appropriate principal investigators and QA/Management reviewers, which will provide an opportunity for reiteration of procedural requirements and a forum for discussion to clarify confusion regarding this new procedure.
2. On December 17, 2001, when it was discovered that some reviewers were confused regarding the AP-2.14Q review criteria, S&ET management developed non-mandatory AP-2.14Q review guidance, in an effort to clarify the expectations of the reviews and expedite the process. See this guidance in Attachment II to this response.
3. A Statement of Quality Assurance Requirements, imposing AP-SIII.7Q on ANL and PNNL, was placed in the ANL and PNNL contracts on 01/14/02. They are now contractually required to follow AP-SIII.7Q prior to Waste Form testing.

18. Due Date: 4/26/02
☐ For submittal of complete response
☒ For completion of corrective action

19. Response by: Mark Peters (Roger Henning– Responsible Ind.)
Date: February 21, 2002 Phone: 5-3644

20. Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject
QAR Donald J. Harris Date 2/25/02

21. Concurrence:
DOQA James B. Taylor for Date 2/27/02

Exhibit AP-16.1Q.1 Rev. 12/20/1999

DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Continued from Block 15, Extent of Condition:

The Project-wide "List of Tests Requiring Scientific Investigation Test Plans (under AP-SIII.7Q)" (Attachment I to this response) was reviewed for compliance against the 120-day exemption period allowed per AP-SIII.7Q Section 2.0. It was found that 24 scientific investigation test plans were not approved and brought under control within the 120-day exemption period.

Fourteen SITPs were approved within the appropriate time frame but not brought under control within the allowable time frame, although they are now under control. They are as follows:

- SITP-02-SZ-001
- SITP-02-UZ-002
- SITP-02-UZ-003
- SITP-02-UZ-004
- SITP-02-UZ-010
- SITP-02-EBS-006
- SITP-02-ISM-001
- SITP-02-UZ-012
- SITP-02-UZ-015
- SITP-02-EBS-003
- SITP-02-SZ-002
- SITP-02-UZ-007
- SITP-02-UZ-009
- SITP-02-NA-001

Three SITPs were not approved or brought under control within the appropriate time frame, although they are now approved and under control. They are as follows:

- SITP-02-WP-008
- SITP-02-UZ-005
- SITP-02-WP-001

Seven SITPs are uncompleted and uncontrolled although testing and quality-affecting data collection are continuing under existing task plans and test plans which are not consistent with AP-SIII.7Q requirements. They are as follows:

- SITP-02-UZ-006
- SITP-02-WF-001
- SITP-02-WF-002
- SITP-02-WF-003
- SITP-02-WF-004
- SITP-02-WF-006
- SITP-02-WF-007

There is no negative impact to quality as a result of the delayed completion of the above scientific test plans, since the 120 day deadline was an arbitrarily established administrative requirement to get the new test plans in place. All of the on-going tests were covered under ANL and PNNL test and task plans, approved by the managing organization, that existed prior to AP-SIII.7Q being a procedural requirement.

List of Tests Requiring Scientific Investigation Test Plans (under AP-SIII.7Q)

WP#	TWP #	TEST	TEST PLAN	TEST PLAN IDENTIFIER	PREPARER(S)	ORG.	DUE DATE	APPROVED DATE	CONTROL DATE	In Compliance
8191224UUA P4D1224UF1	TWP-NBS-HS-000003	ECRB Bulkhead Studies	Moisture Monitoring in the ECRB Bulkheaded Cross Drift	SITP-02-UZ-001	David Hudson Rohit Salve	USGS LBL	1/14/02	9/28/01	10/18/01	Yes
8191224IUA	TWP-NBS-GS-000003	Geologic Mapping of Southern Expansion and Jet Ridge	Geologic Mapping of Southern Expansion and Jet Ridge	SITP-02-ISM-002	Bob Dickerson	USGS	Prior to Start of Data Collection	11/21/01	12/10/01	Yes
8191224SUA P4D1224SF1	TWP-NBS-MD-000001	Alluvial Testing Complex	Alluvial Testing Complex – Single-well, Multi-well, and Laboratory Studies	SITP-02-SZ-003	Paul Reimus M. J. Umari	LANL USGS	Prior to Start of Data Collection	12/14/01		Yes
81912246UA	TWP-MGR-MD-000018	Lithostratigraphic Studies in Cooperation with Nye County	Lithostratigraphic Studies in Cooperation with Nye County EWDP	SITP-02-SZ-001	Rick Spengler	USGS	1/14/02	1/2/02	1/30/02	Yes
P4D1224UF1	TWP-NBS-HS-000003	Niche 5	Niche 5 Seepage Testing	SITP-02-UZ-002	Rob Trautz Robert ter Berg	LBL LBL	1/14/02	1/2/02	1/17/02	Yes
P4D1224UF1	TWP-NBS-HS-000003	Systematic Hydrologic Characterization	Systematic Hydrologic Characterization	SITP-02-UZ-004	Yvonne Tsang Paul Cook	LBL LBL	1/14/02	1/2/02	1/28/02	Yes
8191224UUA P4D1224UF1	TWP-NBS-HS-000003	Alcove 8/Niche 3	Alcove 8 Flow & Seepage Testing	SITP-02-UZ-003	David Hudson Rohit Salve	USGS LBL	1/14/02	1/3/02	1/31/02	Yes
8191224UUA P4D1224UF1	TWP-NBS-HS-000003	Moisture Monitoring/Alcove 7	Moisture Monitoring Investigations and Alcove 7 Studies	SITP-02-UZ-010	David Hudson Rohit Salve	USGS LBL	1/14/02	1/3/02	1/17/02	Yes
P4D1224EF2	TWP-MGR-MD-000015	Laboratory Thermal Conductivity Testing	Laboratory Thermal Conductivity Testing	SITP-02-EBS-006	Cliff Howard David Hudson	SNL USGS	1/14/02	1/10/02	1/29/02	Yes
P4D1224EF1	TWP-MGR-MD-000015	Atlas Natural Convection Test	Atlas Natural Convection Test	SITP-02-EBS-002	Bill Lowry Hemi Kalia	SEA LANL	Prior to Start of Data Collection	1/10/02	1/28/02	Yes
8191224UUC	TWP-NBS-GS-000003	TSW Fracture and Lithophysal Studies	TSW Fracture and Lithophysal Studies	SITP-02-ISM-001	Steve Beason	USBR	1/14/02	1/11/02	2/4/02	Yes
P4D1224UD1	TWP-NBS-HS-000003	Drift Scale Test	Drift Scale Test	SITP-02-UZ-012	Robert Jones	SNL	1/14/02	1/11/02	1/31/02	Yes
P4D1224UF1	TWP-NBS-HS-000003	Niche 4	Niche 4 Seepage Testing	SITP-02-UZ-015	Rob Trautz Robert ter Berg	LBL LBL	1/14/02	1/11/02	2/4/02	Yes
P4D1224EF1	TWP-MGR-MD-000015	Atlas Ventilation Test Phase 3	Atlas Ventilation Test – Phase 3	SITP-02-EBS-001	Hemi Kalia	LANL	Prior to Start of Data Collection	1/11/02	1/31/02	Yes
P4D1224EF2	TWP-MGR-MD-000015	Field Thermal Conductivity Testing	Field Thermal Conductivity Testing	SITP-02-EBS-003	Nancy Brodsky Steve Beason	SNL USBR	1/14/02	1/14/02	2/4/02	Yes
81912246UB	TWP-MGR-MD-000018	Hydrologic/ Hydrochemistry Studies in Cooperation with Nye Co. EWDP	Hydrologic/Hydrochemistry Studies in Cooperation with Nye Co. EWDP	SITP-02-SZ-002	Gary Patterson	USGS	1/14/02	1/14/02	2/4/02	Yes
8191224UUB	TWP-NBS-HS-000003	UZ Hydrochemistry U-Series and Pore Water	UZ Hydrochemistry Investigations	SITP-02-UZ-007	Jim Paces Brian Marshall	USGS USGS	1/14/02	1/14/02	1/30/02	Yes
8191224UUB	TWP-NBS-HS-000003	Fluid Inclusions and Thermal History of Yucca Mountain	Fluid Inclusion Studies	SITP-02-UZ-009	Joe Whelan Brian Marshall	USGS USGS	1/14/02	1/14/02	1/30/02	Yes
8191224EUA	TWP-WIS-MD-000008	Waste Package Environment Investigations - Dust Geochemistry	Waste Package Environment Investigations - Dust Geochemistry	SITP-02-WP-008	Zell Peterman	USGS	1/14/02	1/17/02	2/5/02	**No**
P4312222FA	TWP-NBS-GS-000002	Natural Analogs	Natural Analogs	SITP-02-NA-001	Ardyth Simmons	LBL	Prior to Start of Data Collection	1/24/02	2/7/02	Yes
8191224UUB P4D1224UF3	TWP-NBS-HS-000003	36Cl Validation	36Cl Validation	SITP-02-UZ-005	Zell Peterman Robert Roback	USGS LANL	1/14/02	2/4/02	2/13/02	**No**

List of Tests Requiring Scientific Investigation Test Plans (under AP-SIII.7Q)

WP#	TWP #	TEST	TEST PLAN	TEST PLAN IDENTIFIER	PREPARER(S)	ORG.	DUE DATE	APPROVED DATE	CONTROL DATE	In Compliance
P4D1226TH1	TWP-MGR-MD-000018	Rock Modulus Field Testing	Rock Modulus Testing	SITP-02-SSD-001	Larry Costin Tim George	SNL SNL	Prior to Start of Data Collection	2/11/02		Yes
P4D1224UF1	TWP-NBS-HS-000003	Laboratory Sorption Measurements – UZ and SZ	Laboratory Sorption Investigations – UZ and SZ	SITP-02-UZ-011	Paul Reimus	LANL	Prior to Start of Data Collection	2/12/02	2/25/02	Yes
P4D1224PF1	TWP-WIS-MD-000008	Passive Film Characterization	Waste Package and Drip Shield Materials Testing	SITP-02-WP-001	Dan McCright	LLNL	1/14/02	2/13/02	2/26/02	No
P4D1224UF5	TWP-NBS-HS-000003	Busted Butte Transport Test	Busted Butte Transport Testing	SITP-02-UZ-006	Wendy Soll	LANL	1/14/02			No
P4D1224FF1	TWP-WIS-MD-000008	Long Term Studies of the Degradation and Radionuclide Release from Commercial Spent Fuel and Fuel Rod Segments	Commercial Spent Fuel and Fuel Rod Segment Degradation and Radionuclide Release in Long Term Tests	SITP-02-WF-001	P. Finn	ANL	1/14/02			No
P4D1224FF1	TWP-WIS-MD-000008	Long Term Studies of the Degradation and Radionuclide Release from Defense High-Level Waste (DHLW) Glass	DHLW Degradation and Radionuclide Release in Long-Term Tests	SITP-02-WF-002	W. Ebert	ANL	1/14/02			No
P4D1224FF1	TWP-WIS-MD-000008	Laboratory Tests to Study the Characteristics and Concentration of Waste Form Colloids	Waste Form Colloids Characterization and Concentration Studies	SITP-02-WF-003	C. Mertz	ANL	1/14/02			No
P4D1224FF1	TWP-WIS-MD-000008	Tests to identify and Characterize Solid Phases that Control the Dissolved Concentration of Radionuclides e.g. Np	Validation of Dissolved Radionuclide Concentration	SITP-02-WF-004	R. Finch	ANL	1/14/02			No
P4D1224FF1	TWP-WIS-MD-000008	Tests to determine the oxidation response of SCNF to dry- and moist-air atmospheres	CSNF Oxidation Testing	SITP-02-WF-006	Steve Marschman Brady Hanson	PNNL PNNL	1/14/02			No
P4D1224FF1	TWP-WIS-MD-000008	Tests to determine the CSNF reaction rate for LA	CSNF Flow-through Dissolution Testing	SITP-02-WF-007	Steve Marschman Brady Hanson	PNNL PNNL	1/14/02			No
P4D1224DFU	TWP-WIS-MD-000007	Ash Redistribution Studies and Field Studies of Lava Morphology & Igneous Processes	Ash Redistribution Studies and Field Studies of Lava Morphology & Igneous Processes	SITP-02-DE-001	Chuck Harrington Greg Valentine	LANL LANL	Prior to Start of Data Collection			Yes
P4D1224EF2	TWP-MGR-MD-000015	Reactive Transport Column Experiments	Reactive Transport Column Experiments	SITP-02-EBS-004	Carl Steefel	LLNL	Prior to Start of Data Collection			Yes
P4D1224EF1	TWP-MGR-MD-000015	Atlas Breached Waste Package and Drip Shield Experiments	Atlas Breached Waste Package and Drip Shield Experiments	SITP-02-EBS-005	Bill Lowry	SEA	Prior to Start of Data Collection			Yes
P4D1226TH1	TWP-MGR-MD-000018	Mechanical Properties Laboratory Investigations	Mechanical Properties Laboratory Investigations	SITP-02-SSD-002	Ron Price Larry Costin	SNL SNL	Prior to Start of Data Collection			Yes
P4D1226TH1	TWP-MGR-MD-000018	Ground Support Testing	Ground Support Testing	SITP-02-SSD-003	Hemi Kalia	LANL	Prior to Start of Data Collection			Yes
P4D1224UF2	TWP-NBS-HS-000003	Laboratory Block Experiments	Laboratory Flow/Coupled Process Block Experiments	SITP-02-UZ-013	Tim Kneafsey	LBL	Prior to Start of Data Collection			Yes

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List of Tests Requiring Scientific Investigation Test Plans (under AP-SIII.7Q)

WP#	TWP #	TEST	TEST PLAN	TEST PLAN IDENTIFIER	PREPARER(S)	ORG.	DUE DATE	APPROVED DATE	CONTROL DATE	In Compliance
P4D1224UD1	TWP-NBS-HS-000003	Cross Drift Thermal Test	Cross Drift Thermal Test	SITP-02-UZ-014	Robert Jones	SNL	Prior to Start of Data Collection			Yes
P4D1224FF1	TWP-WIS-MD-000008	Tests to quantify the generation of colloids from corroded CSNF	CSNF Colloid Release Testing	SITP-02-WF-008	Steve Marschman Edgar Buck	PNNL PNNL	Prior to Start of Data Collection			Yes
P4D1224FF1	TWP-WIS-MD-000008	Tests to validate the dissolved concentration of radionuclides controlled by fully reacted spent fuel	PNNL Dissolved Concentration Validation Testing	SITP-02-WF-009	Steve Marschman Edgar Buck Chuck Soderquist	PNNL PNNL PNNL	Prior to Start of Data Collection			Yes

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Those organizations identified on page 1 of this Review Record, other than QATSS and M&O Regulatory and Licensing, that are thereby designated as technical reviewers of the SITP under review are requested to focus their review specifically as follows:

- Those reviewing organizations that provide data needs, pre-test predictions, input data and information for the test documented in the SITP should review the SITP specifically to ensure that:
  - The input data, pre-test predictions, and user needs were used and interpreted correctly in the planning for the test.
  - The SITP adequately documents the use and interpretation of these data, including effects and consequences of data limitations.
- Those reviewing organizations who receive output data and information from the test documented in the SITP should review the SITP specifically to ensure that:
  - The pre test analysis or model is suitable for its intended purpose.
  - The documentation provided in the SITP is adequate to demonstrate the suitability of the testing for its intended purpose.

In performing these reviews, the technical reviewing organizations are asked to consider the following additional review criteria, as applicable:

1. If a section is not applicable to a particular test plan, is non-applicability so stated and adequately justified? Are the sections clearly tied to the minimum requirements in AP-SIII.7Q section 5?
2. Does the SITP present a clear statement of the technical purpose and objectives of testing?
3. Is the discussion of work scope including product description, responsibilities, activity identity and tasks defined, and schedule, clear and consistent with your organization's needs?
4. Are the descriptions of pre-test calculations/analysis/ model predictions clear and match your understanding of the results obtained by the pre-test predictions? Are the pre-test predictions referenced as documentation in a controlled source?
5. Are the scientific approach / technical methods adequately described in the SITP, and is this discussion sufficient to demonstrate that these data can used properly to perform necessary analysis or construct models using the results of the testing?
6. Is the level of detail and manner of presentation, including tables and figures, sufficient to allow a technically qualified individual to understand the development of the technical arguments, the scientific methods used, the conclusions reached, and the presentation of technical information and results without recourse to the SITP originator?
7. Are the technical arguments sound and appropriate and adequate to provide comfort that the testing will yield results usable by the customers?
8. Are the technical assumptions identified and are adequate bases for these assumptions provided? Is there adequate discussion of the scientific basis for the test methodology selected?
9. Is the discussion of the accuracy and precision addressed adequately? Is the handling of unexpected results/conditions clear and if they require additional evaluation of the pre-test predictions, is there enough information from the test plan to aid in re-evaluating results versus expectations?
10. If the testing is done to support validation of a model(s), does the SITP provide parameters that support model validation, including validation criteria, the methods for conducting model validation, and the specific analytical tests to be conducted? If alternative models are to be used, will this test support alternative models?
11. Is the description of interface control appropriate for your department?
12. Do the mandatory hold points, if any seem justified?

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

☒ DR/CAR/QO
☐ SWO

NO. BSC-02-D-068
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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

VERIFICATION AND CLOSURE OF CORRECTIVE ACTION FOR BSC-02-D-068

Block 14a Immediate Action:

Not Applicable

Block 14 - Remedial Actions:

Verified test plans required by AP-SIII.7Q for work that already begun were developed, approved, and submitted for controlled distribution and records processing were completed as follows:

1. Fourteen STIPs that were approved within the time frame, but were not submitted for controlled distribution and records processing were satisfactory completed and are controlled and effective as follows:

· SITP-02-SZ-001 1/30/02
· SITP-02-UZ-002 1/17/02
· SITP-02-UZ-003 1/31/02
· SITP-02-UZ-004 1/28/02
· SITP-02-UZ-010 1/17/02
· SITP-02-EBS-006 1/28/02
· SITP-02-ISM-001 02/4/02
· SITP-02-UZ-012 1/31/02
· SITP-02-UZ-015 02/4/02
· SITP-02-EBS-003 1/31/02
· SITP-02-SZ-002 02/4/02
· SITP-02-UZ-007 1/30/02
· SITP-02-UZ-009 1/30/02
· SITP-02-NA-001 02/7/02

2. Three SITPs were not approved or brought under control within the time frame, were satisfactory completed and are controlled and effective as follows:

· SITP-02-WP-008 02/5/02
· SITP-02-UZ-005 02/13/02
· SITP-02-WP-001 02/26/02

3. Seven SITPs were not completed, even though testing and quality-affecting data collection were continuing under previous test plans that were not consistent with AP-SIII.7Q requirements. These SITPs were satisfactory completed and are controlled and effective as follows:

· SITP-02-UZ-006 5/7/02
· SITP-02-WF-001 4/1/02
· SITP-02-WF-002 4/1/02
· SITP-02-WF-003 4/1/02
· SITP-02-WF-004 4/10/02
· SITP-02-WF-006 5/7/02
· SITP-02-WF-007 5/7/02

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

☒ DR/CAR/QO
☐ SWO

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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

Block 17, Action to Preclude Recurrence:

1. Verified the BSC Science & Engineering Test Department (S&ET) management developed non-mandatory AP-2.14Q review guidance to clarify management's expectations of the review process, (Attachment II to the DR response).

2. Verified the Statement of Work (QA requirements) was revised to impose AP-SIII.7Q on Argonne National Laboratory (ANL) and Pacific Northwest National Laboratory (PNNL).

Based on the above verification, it is recommended that this deficiency report be closed.

QAR: Donald J. Harris DATE: 5-2-02
Donald J. Harris