



**Department of Energy**

Washington, DC 20585

QA: QA

MAY 07 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-066 RESULTING FROM THE OFFICE OF QUALITY ASSURANCE (OQA)  
SURVEILLANCE BSC-02-S-06**

The OQA staff has evaluated the corrective action of DR BSC-02-D-066 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 John R. Doyle at (702) 794-5021.

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

OQA:JB-1156

Enclosure:  
DR BSC-02-D-066



*WMS07  
WMS-11*

MAY 07 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  
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~~NTMSS07~~  
Wm-H

**OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
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**ORIGINAL**  
**DEFICIENCY REPORT**

8.  DEFICIENCY REPORT  
 CORRECTIVE ACTION REPORT

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**DEFICIENCY/CORRECTIVE ACTION REPORT**

1. Controlling Document:  
BAB000000-01717-2200-00005, Revision 7, ICN 3, , "Determination of Importance for the Subsurface Exploratory Studies Facility"

2. Related Report No.:  
BSC-02-S-06

3. Responsible Organization:  
Bechtel SAIC Company, LLC  
Site Construction, Science and Engineering

4. Discussed With:  
Charles Sparks, Mark Peters

5. Requirement:  
BAB000000-01717-2200-00005, " paragraph 3.0, Methodology states in part: ". . . After approval of this DIE, implementing documents (e.g., design specifications and design drawings) will be reviewed by the Safety Assurance (SA) department. These reviews are conducted to:

- 1) Ensure that the original basis for the evaluation (i.e., best available design information) adequately bounds the final scope of activities to be conducted in the Subsurface Exploratory Studies Facility (ESF); and

(Continued on page 2)

6. Description of Condition:

Contrary to the above requirement, a review of specifications: BABEE0000-01717-6300-02165, Revision 00, SCN 1, "Rockbolts, Accessories and Associated Ground support Material; BABEE0000-01717-6300-02341, Revision 00, SCN 1, "ESF Ground Support Structural Steel;" Drawing BABEAF000-01717-2100-40361, Revision 00, DCN 1, "ECRB Refuge Station General Arrangement and Details," Work Order #13663, Fabricate and install platforms, ceramic fire blankets and weld anchor pins-bulkhead; fabricate and install platforms on both side of ECRB bulkhead at 17+63; wood anchor pins (studs) onto existing bulkhead plates and install ceramic fire blanks have not under gone SA reviews as required by the governing DIE.

In addition, AP-3.24Q, Revision 0, ICN 1, *Drawings*; AP-3.19, Revision 1, ICN 1, *Specifications*; and AP-2.23Q, Revision 0, *Work Request/Work Order Process*, do not have SA included in their review and approval processes.

7. Initiator:  
John R. Doyle *John R. Doyle* Date 01/16/02

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.

11. QA Review: John R. Doyle  
QA *John R. Doyle* Date 1/25/02

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: :  
QA *John R. Doyle* Date 05/02/02

23. Closure Approved by:  
DOE/OQA *James Blaylock* Date 5/7/02

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8.  DR/CAR  
 Stop Work Order

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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

5. Requirement: (Continued)

- 2) Verify that any applicable DIE requirements have been properly integrated into implementing documents."

In addition, a review of DIEs BAA000000-01717-2200-00101, Revision 2, ICN 2, "Determination of Importance Evaluation for Surface-Based Testing Activities" and BAB000000-01717-2200-0106, Rev. 3, ICN 2, "Determination of Importance Evaluations for the Surface Exploratory Studies Facility" revealed that the same review was required.

TYPE RESPONSE:

- Initial
- Complete
- Amended

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

14a. Immediate Actions:

N/A

Compliance Date:

14. Remedial Actions:

N/A

15. Extent of Condition:

There is no impact and no need to perform corrective actions based on the fact that the statement documented in Block 5 of this deficiency report is not an actual requirement that must be implemented. Although it sounds like a requirement, all requirements are contained in Section 13 of the Determination of Importance Evaluations (DIEs) and discussions throughout the text in other sections are not treated as requirements. The methodology statement in Section 2 of the DIE, BABEAF000-01717-2200-00011 REV05, *Determination of Importance Evaluation for the ESF Enhanced Characterization of the Repository Block Cross Drift*, is not a requirement, because it was not identified as a requirement in Section 13. The methodology describing review of implementing documents that contain DIE requirements, however, was followed. The changes to the engineering documents described in Block 6 of this DR did not include requirements from the Safety Assurance (SA) department and thus no additional SA review was required. The work order described in Block 6 of this DR did not include requirements from the Safety Assurance (SA) department and thus no additional SA review was required.

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

N/A

17. Action to Preclude Recurrence:

N/A

18. Due Date: 4/19/02

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

19. Response by: Mark Peters (James Hollins - Responsible Ind.)

*Mark J Peters 2/25/02 James Hollins R.W. 2/25/02*  
Date: February 25, 2002 Phone: 5-3644 *RF*

20. Evaluation:  Accept  Partially Accept  Reject

QAR *John R Doyle* Date *3/1/02*

21. Concurrence:

DOQA *James B Dayford Jr* Date *3/7/02*

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8.  DR/CAR  
 Stop Work Order

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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Partial Acceptance of Complete Response to Deficiency Report BSC-02-D-066

D6<sup>0</sup>  
3/5/02

Block 15 Extent of Condition:

While OQA accepts the rational presented in the initial and complete response of 2/25/02, a revision/change is necessary to the existing Determinations of Importance Evaluations to clarify the methodology statement in the exiting DIES which "... sounds like requirement " The rational here is to preclude recurring similar questions that may arise from personnel reviewing these documents other than the QAR. As a result of this evaluation, an amended response is requested to address this concern.

QAR:

John R. Doyle

Date:

3/1/02.

John R. Doyle

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)  
Not applicable. See impact (below).

5. Impact: (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)  
There is no impact and no need to perform corrective actions based on the fact that the statement documented in Block 5 of this deficiency report is not an actual requirement that must be implemented. Although it sounds like a requirement, all requirements are contained in Section 13 of the Determination of Importance Evaluations (DIEs) and discussions throughout the text in other sections are not treated as requirements. The methodology statement in Section 2 of the DIE, BABEAF000-01717-2200-00011 REV05, Determination of Importance Evaluation for the ESF Enhanced Characterization of the Repository Block Cross Drift, is not a requirement, because it was not identified as a requirement in Section 13. The methodology describing review of implementing documents that contain DIE requirements, however, was followed. The changes to the engineering documents described in Block 6 of this DR did not include requirements from the Safety Assurance (SA) department and thus no additional SA review was required. The (See Addendum 1)

6. Remedial Actions: (Document all actions necessary to address the results of the Extent of Condition)  
Not applicable.

7.  Root Cause (For a significant CAQ, attach results of formal root cause determination prepared in accordance with AP-16.4Q)  
 Apparent Cause  
Not applicable.

8. Action to Preclude Recurrence: (Address those actions necessary to prevent the identified cause from recurring)  
Although no "actions to preclude recurrence" have been initiated as a result of this DR (because no deficiency took place), there is an action that has been initiated independently of this process that may be beneficial in the closure of this DR. NLP-2-0, Determination of Importance Evaluations, is in the process of being modified to clarify what should be in Section 13 of the Determination of Importance Evaluations (DIEs). It should be noted that NLP-2-0, once revised, will become LP-SA-001Q-BSC, due to reasons not associated with this deficiency report. The DIEs will not be revised as part of this process.

9. Due Date for Completion of Corrective Action:  
04/09/2001 2002 D60  
4/24/02

10. Responsible Manager:  
Mark T. Peters Mark Peters 4/9/02  
Printed Name Signature Date

11. QAR Evaluation:  Accept  Partially Accept  Reject  
NOT SIGNIFICANT.  
John R. Deyle John Deyle 4/25/02  
Printed Name Signature Date

12. QAM Concurrence:  
RAN MURPHY James Blaylock 4/25/02  
Printed Name Signature Date

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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

Addendum 1

Continued from block 5:  
work order described in Block 6 of this DR did not include requirements from the Safety Assurance (SA) department and thus no additional SA review was required.

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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

Verification of Corrective Actions to DR BSC-02-D-066

Block 14a. Immediate Actions:

None Required

Block 14. Remedial Action

None Required

Block 15. Extent of Condition:

See Original Response

Block 16. Cause:

None Required

Block 17. Action to Preclude Recurrence

Verified LP-SA-001Q-BSC "Determination of Importance and Site Performance Protection" Rev. 0/ICN 0, effective 05/08/02, and pertinent Sections 3.0 "Methodology" and 13.0 "Establishment of Controls" which clarify the Q processes/controls required for the DIES.

The Above Committed Corrective actions have been satisfactorily verified.

This Deficiency Report is considered closed.

QAR: John R. Doyle Date: 05/02/02.

John R. Doyle