



QA: QA

Robert M. Sandifer, Manager Projects
Requirements & Configuration Management
Bechtel SAIC Company, LLC
1180 Town Center Drive
Las Vegas, NV 89144

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORTS
(DRs) BSC(V)-02-D-088 AND -089 RESULTING FROM THE BECHTEL SAIC COMPANY,
LLC (BSC) QUALITY ASSURANCE AUDIT BSC-SA-02-015 OF PARALLAX, INC.

BSC Quality Assurance has verified implementation of corrective action for DRs
BSC(V)-02-D-088 and -089 and determined the results to be satisfactory. As a result, the DRs
have been closed.

If you have any questions, please contact either Robert D. Habbe at (702) 295-1631 or
Daniel A. Klimas at (702) 295-2665.

A handwritten signature in cursive script, appearing to read 'D. T. Krisha'.

Donald T. Krisha, Manager
Quality Assurance

5/20/02
Date Signed

RDH:bw-0520022697

Enclosure:
DR BSC(V)-02-D-088 and -089

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WM-11

May 20, 2002

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cc w/encl:

L. H. Barrett, DOE/HQ (RW-2) FORS
L. W. Bradshaw, Nye County, Pahrump, NV
Margaret Chu, DOE/HQ (RW-1) FORS
J. R. Dyer, DOE/YMSCO, Las Vegas, NV
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D. G. Horton, DOE/YMSCO, Las Vegas, NV
D. A. Klimas, BSC, Las Vegas, NV
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L. O. Armstrong, BSC, Las Vegas, NV
R. D. Habbe, BSC, Las Vegas, NV
E. F. Loros, BSC, Las Vegas, NV
D. M. Myers, Parallax, Inc., Germantown, MD

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8. DEFICIENCY REPORT
 CORRECTIVE ACTION REPORT

NO. BSC(V)-02-D-088

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DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document: Parallax, Inc. Quality Assurance Program (QAP), Revision 2 and Quality Implementing Procedure (QIP) 5.0.1, Revision 0	2. Related Report No.: BSC-SA-02-015
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3. Responsible Organization: BSC/ Parallax	4. Discussed With: R. Sandifer, BSC; D. Myers, Parallax
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5. Requirement:

A. Parallax QAP, Section 8.2.2, states: "Revisions to controlled documents shall be reviewed and approved by the organization that originally reviewed and approved them."

B. Parallax QAP, Section 8.2.1, states: "A system shall be established and implemented to control the preparation, review, approval, issuance, use and revision of documents that establish policies, prescribe work, specify requirements, or establish design." Parallax QAP, Section 9.2.1, states: "Work shall be performed to established technical standards and administrative controls. Work Instructions, procedures, and other forms of direction shall be developed, verified, validated and approved by technically competent personnel, and shall be provided to employees at their work location." Parallax QIP 5.0.1, Procedures, Revision 0, Section 5. states: "Procedures are prepared, reviewed, and approved in accordance with this procedure."

6. Description of Condition:

Contrary to the above:

A. No objective evidence could be provided that the Parallax Quality Assurance Program, Revisions 1 and 2 were reviewed and approved by the organization that reviewed and approved revision 0.

B. 1. There is no process (procedure) to describe the method for qualification of personnel. 2. Two Work Instructions WI-RMP-1 and WI-RMP-2 have been developed to control the BSC work and there is no defined process (procedure) for the preparation, review, approval or issuance of work instructions. 3. A document titled "Technology Methodology" has been created to describe and control the work that Parallax is performing on the BSC purchase order. This document does not comply with the format, review, approval, or revision requirements stated in Parallax Quality Implementing Procedure 5.0.1.

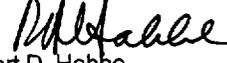
7. Initiator:  Robert D. Habbe Date 3/14/02	9. Does a stop work condition exist? (Not required for a DR) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Check One: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
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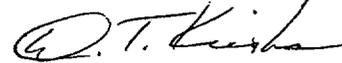
10. Recommended Actions:

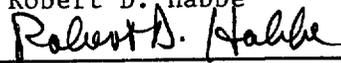
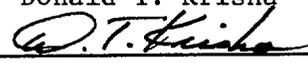
Take the necessary action to identify the reviewers of QAP, revision 1 and 2 and develop a process for control of the review of future revisions of the QAP.

Take the necessary action to prepare the document "Technology Methodology" in the QIP 5.0.1 format. Develop a process for preparation and control of Work Instructions. Prepare a process for the qualification of personnel. Determine if other procedures/processes for quality affecting work do not comply with the QAP or QIP requirements.

Determine if the conditions had any impact on the work performed on the BSC purchase order.

11. QA Review:  QAR Robert D. Habbe Date 03/14/02	12. Response Due Date: 20 Working Days From Issuance
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13. DOQA Issuance Approval: Printed Name Donald T. Krishna Signature  Date 3/19/02
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22. Corrective Actions Verified: QAR Robert D. Habbe  Date 5-16-02	23. Closure Approved by: Donald T. Krishna  Date 5/29/02
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2. Check if Amended
 Check if also Initial Response

3. Extended Processing

No Yes (If yes, submit
 Extended Processing request)

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1. DR/CAR NO. **BSC(V)-02-D-088**
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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)

The extent of the conditions adverse to quality are limited to the Parallax work performed on BSC order 24540-020-PA-002333.

The extent of condition is limited to the Parallax Quality Assurance Program (QAP), Criterion 2; Quality Implementing Procedure (QIP) 5.0.1; Parallax procedure "Technology Methodology", Revision 0; and Work Instructions (WI) WI-RMP-1 and WI-RMP-2.

5. Impact: (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)
 There is no impact to waste isolation, safety, or the work performed on BSC order 24540-020-PA-002333 based on the following. Relative to qualification of personnel, prior to performing the work, the Parallax Human Resources Manager and Project Manager evaluated the BSC work scope and selected Parallax personnel who were qualified to perform the work. This evaluation and selection of qualified personnel was documented in the Parallax project file, which was verified during the BSC audit. The two work instructions were given revision numbers so employees would be working to the latest revisions. Additionally, the WI's were approved by the Parallax Project Manager prior to use and the WI's were specific to only the BSC project. "Technology Methodology", Revision 0, was submitted to BSC and was approved by BSC prior to use.

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

a. A QAP cover page was developed and signed by J. Harrison, Parallax QA Manager and M. Lewis, Parallax President on 03/06/2002 indicating QAP, Revision 2, was reviewed and approved. The review and approval of Revision 1 of the QAP was not documented, but was performed by J. Harrison, Parallax QA Manager and M. Lewis, Parallax President.

b. Convert "Technical Methodology" to a controlled document. "Technical Methodology", Revision 0, issued on 03/07/02 complies with QIP 5.0.1.

c. Develop a new procedure for qualifying technical personnel.

d. Modify existing Procedure QIP 5.0.1 to define the process for preparing, reviewing, approving, and issuing work instructions.

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

Lack of familiarity by the Parallax Project Manager with the Parallax quality requirements. This was the first application of the Parallax QAP on a major project.

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

On 3/8/02, the Parallax Program Manager for the BSC project held a training session with the Parallax personnel working on the BSC project and discussed the Parallax quality requirements, Work Instructions, and Technology Methodology to ensure a thorough understanding of these requirements for this project.

4-24-02
 PAH

9. Due Date for Completion of Corrective Action:

04/30/2002

10. Responsible Manager:

Robert M. Sandifer *Robert M. Sandifer* 4-24-02
 Printed Name Signature Date

11. QAR Evaluation: Accept Partially Accept Reject

R.D. HABBC *PAH* 4-24-02
 Printed Name Signature Date

12. QAM Concurrence:

Donald T. Krishna
DONALD T. KRISHNA 4/25/02
 Printed Name Signature Date

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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE of DR BSC(V)-02-D-088

This verification was based on a review of documentation provided by Parallax, Inc.

Verification of Remedial Actions:

The QAR performed a review of the Parallax Quality Assurance Program (QAP) Revision 2 cover page dated 03/06/2002 and found that J. Harrison, Parallax QA Manager, and M. Lewis, Parallax President, had reviewed and approved the QAP.

The QAR performed a review of the Parallax Procedure, Technology Methodology, Revision 0, and verified that it complies with the Parallax Quality Implementing Procedure (QIP) 5.0.1.

The QAR performed a review of the Parallax Procedure, HR-001, Employee Education and Experience Verification, Revision 1, and verified that it addresses requirements for qualification of personnel.

The QAR performed a review of the Parallax Procedure, QIP 5.0.1, Procedures, Revision 1, and verified that the procedure provides a process for the control of Work Instructions.

Verification of Action to Preclude Recurrence:

The QAR performed a review of Parallax Training Attendance Record documenting training on the Methodology for Yucca Mountain Requirements Management, Project Plan (which includes the QAP and QIP's) and Project Requirements Document.

A review of the extent of condition did not indicate that this DR is a significant condition.

The documentation provided and the corrective actions taken provide satisfactory implementation of correction actions for this DR. Based on the above this DR is considered closed.

Robert D. Habbe

Robert D. Habbe

5-16-02

Date Signed

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8. DEFICIENCY REPORT
 CORRECTIVE ACTION
REPORT

NO. BSC(V)-02-D-089

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DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document:
Parallax, Inc. Quality Implementing Procedure (QIP) 2.0.2
Revision 0, and BSC Technical Services Subcontract 24540-020-PA-
002333

2. Related Report No.:
BSC-SA-02-015

3. Responsible Organization:
BSC/ Parallax

4. Discussed With:
R. Sandifer, BSC; D. Myers, Parallax

5. Requirement:

Parallax QIP 2.0.2, Qualification and Certification of Assessment Personnel, Revision 0, Section 1., states: "This procedure describes Parallax's program for qualifying and certifying assessment personnel."

6. Description of Condition:

Contrary to the above:

M. Lewis and M. Knapp are performing an independent assessment of the BSC work and no objective evidence of their qualification to QIP 2.0.2 could be provided.

7. Initiator:

R. D. Habbe

Robert D. Habbe

Date 3/14/02

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:

Take the necessary action to qualify M. Lewis and M. Knapp and all other personnel prior to the performance of independent assessments per the QIP requirements.

Determine if other personnel have performed independent assessments that were not qualified.

Determine if the condition had any impact on the work performed on the BSC purchase order.

11. QA Review:

R. D. Habbe

QAR

Robert D. Habbe

Date 03/14/02

12. Response Due Date:

20 Working Days From Issuance

13. DOQA Issuance Approval:

Printed Name Donald T. Krishna

Signature *D. T. Krishna*

Date *3/19/02*

22. Corrective Actions Verified:

Robert D. Habbe

QAR

Robert D. Habbe

Date *5-16-02*

23. Closure Approved by:

Donald T. Krishna

D. T. Krishna

Date *5/29/02*

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

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)

No other instances were identified where personnel conducting independent assessments were not certified. Margie Lewis and Mal Knapp were the only two.

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

There is no impact to waste isolation, safety or the work performed on BSC Purchase Order 24540-020-PA-002333. Both, M. Lewis and M. Knapp, met the minimum qualification requirements of Procedure QIP 2.0.2, but simply failed to complete the required documents for the certification process.

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

Certify Margie Lewis and Mal Knapp in accordance with QIP 2.0.2 to conduct independent assessments on this project. (This action was completed on 03/31/2002.)

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

Parallax, Inc.'s Project Manager and assessment personnel were not aware that personnel required certification to QIP 2.0.2 prior to performing assessments.

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

QAP will be revised to require Parallax Inc.'s Program Manager/Project Managers to verify that assessment personnel are certified prior to performing assessments on their project.

9. Due Date for Completion of Corrective Action:

04/30/2002

10. Responsible Manager:

Robert M. Sandifer *[Signature]* 4-17-02
Printed Name Signature Date

11. QAR Evaluation: Accept Partially Accept Reject

R.I.D. HABBE *[Signature]* 4-22-02
Printed Name Signature Date

12. QAM Concurrence:

DONALD T. KRISHA *[Signature]* 4/25/02
Printed Name Signature Date

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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE of DR BSC(V)-02-D-089

This verification was based on a review of documentation provided by Parallax, Inc.

Verification of Remedial Actions:

The QAR performed a review of Parallax Certification Records for M. Lewis and M. Knapp. The records indicate that both individuals are qualified and certified as Lead Auditors per Parallax Quality Implementing Procedure (QIP) 2.0.2.

Verification of Action to Preclude Recurrence:

The QAR performed a review of Parallax Quality Implementing Procedure QIP 2.0.2, Revision 1, dated 04/29/2002, and verified that a new Section 4.2 has been added that states: "The Program Manager/Project Managers shall verify that Lead Auditors are certified and Auditors are qualified in accordance with this procedure prior to performing assessments on the program or project."

A review of the extent of condition did not indicate that this DR is a significant condition.

The documentation provided and the corrective actions taken provide satisfactory implementation of correction actions for this DR. Based on the above this DR is considered closed.

Robert D. Habbe

Robert D. Habbe

5-16-02

Date Signed