



QA: QA

James H. Hayes  
M&O Field Engineering  
Bechtel SAIC Company, LLC (BSC)  
1180 Town Center Drive  
Las Vegas, NV 89144

**ISSUANCE OF DEFICIENCY REPORT (DR) BSC(B)-02-D-131 RESULTING FROM  
MONITORING OF SUBMITTALS BY BSC QC**

Enclosed is the subject DR generated as a result of review of documentation associated with the implementation of Specification BSB000000-01717-6300-01300. The condition adverse to quality relates to failure to comply with Specification 1300, *Submittal Requirements*.

Please provide the original copy of the response within 10 working days from the date of this correspondence to Howard R. Cox, Bechtel SAIC Company, LLC, 1180 Town Center Drive, Las Vegas, Nevada 89144, with a copy to Deborah G. Opielowski, Navarro Quality Services, P. O. Box 364629, YMSCO Mail Stop 455, North Las Vegas, Nevada 89036-8629.

If you have any questions, please contact either Howard R. Cox (702) 295-3697 or John S. Martin at (702) 295-2832.

A handwritten signature in cursive script that reads 'D. T. Krisha'.

Donald T. Krisha, Manager  
Quality Assurance

6/11/02  
Date Signed

REP:bw-0610022944

Enclosure:  
DR BSC(B)-02-D-131

NMSS07  
Wm-11

June 11, 2002

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cc w/encl:

R. W. Andrews, BSC, Las Vegas, NV  
G. K. Beall, BSC, Las Vegas, NV  
L. W. Bradshaw, Nye County, Pahrump, NV  
Margaret Chu, DOE/HQ (RW-1) FORS  
J. R. Dyer, DOE/YMSCO, Las Vegas, NV  
W. J. Glasser, NQS, Las Vegas, NV  
C. E. Hampton, DOE/YMSCO, Las Vegas, NV  
D. G. Horton, DOE/YMSCO, Las Vegas, NV  
D. T. Krisha, BSC, Las Vegas, NV  
Robert Latta, NRC, Las Vegas, NV  
S. W. Lynch, State of Nevada, Carson City, NV  
S. P. Mellington, DOE/YMSCO, Las Vegas, NV  
Ram Murthy, DOE/OQA, Las Vegas, NV  
D. G. Opielowski, NQS, Las Vegas, NV  
R. E. Powe, BSC, Las Vegas, NV  
J. M. Replogle, DOE/YMSCO, Las Vegas, NV  
N. K. Stablein, NRC, Rockville, MD  
Engelbrecht von Tiesenhausen, Clark County, Las Vegas, NV  
T. J. Wall, BSC, Las Vegas, NV  
B. L. Wilson, BSC, Las Vegas, NV

cc w/encl:

H. R. Cox, BSC, Las Vegas, NV  
E. F. Fitch, BSC, Las Vegas, NV  
Leon Fossum, BSC, Las Vegas, NV  
R. L. Noel, BSC, Las Vegas, NV

NMSSC  
DATE

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

8.  Deficiency Report  
 Corrective Action Report  
  
No. BSC(B)-02-D-131  
  
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**DEFICIENCY REPORT/CORRECTIVE ACTION REPORT**

1. Controlling Document: (Document ID and Revision or Date)  
BAB000000-01717-6300-01300 Rev. 01

2. Related Report No.:  
QC Checklists Issue #1010, 1123, 1049,  
1073, 1074

3. Responsible Organization:  
M&O Field Engineering

4. Discussed With:  
Jim Hayes

5. Requirement:  
Specification Section 01300 paragraph 2.11 "PLANS/PROCEDURES" A. Where drawings or specifications sections require a plan/procedure to be submitted to the A/E for acceptance/approval, the requirement shall be satisfied by submitting the plan/procedure to the A/E for approval, or by obtaining A/E pre-approval of the plan/procedure and submitting a Requirement Compliance Report (RCR). To qualify as an A/E pre-approved plan/procedure, the following conditions shall be met: 1. A/E has been a formal reviewer in accordance with the applicable procedure under which the plan/procedure was prepared. 2. The issued plan/procedure is technically the same as the review concurrence copy. 3. The specific drawings or specification sections requirement(s) are to be cited for cross-reference in the Purpose, Scope or the Revision History of the plan/procedure. B. The RCR shall be submitted to the A/E as "information" against each applicable drawing or specification section requirement. The report shall include the title and document identifier of the plan/procedure, effective date of the plan/procedure, the name of the A/E representative(s) who participated in the review, and state that the plan/procedure was pre-approved by the A/E in accordance with Specification Section 01300 2.11.

6. Description of Condition:  
Contrary to the above requirements: Appropriate submittals have not been accomplished. Examples are:

1. The Constructor submitted RCR, Transmittal No. C01-0015-00, to the A/E for the pre-approval of LP-OM-042Q-BSC, Rev. 0, ICN 0. The submittal was approved by the A/E with an Action Code E. Contrary to this, the specification sections requirement(s) are not cited for cross-reference in the Purpose, Scope or the Revision History of the procedure and there is no objective evidence in the Record Information System (RIS) that the procedure was pre-approved by the A/E. (If not pre-approved, the procedure is required to be submitted and approved prior to performing work.)
2. Transmittal No. C-02-0007-00 indicates the submittal of LP-OM-027Q-BSC, Rev. 0, ICN 1, to the requirement of Spec. 01501 Paragraph 3.01 S3.d. Contrary to this, Specification 01501 requires the submittal of LP-OM-027Q-BSC to Paragraph 3.02B.2.

(See Continuation Page)

Has work been stopped?  Yes  No

7. Initiator:  
Richard L. Noel Richard L. Noel 05/23/02  
Printed Name Signature Date

9 Does a stop work condition exist?  
 Yes  No  N/A  
If Yes, Check One:  A  B  C  D

10. Recommended Actions:

DETERMINE CAUSE OF INADEQUATE SUBMITTAL PREPARATION AS WELL AS INADEQUATE SUBMITTAL REVIEW (e.g., INADEQUATE PROCEDURAL INSTRUCTION, INATTENTION TO PROCEDURAL DETAIL, INADEQUATE TRAINING/INSTRUCTION, LETHARGY, ETC.).

11. QAR Review:  
Howard Cox Howard Cox 6/5/02  
Printed Name Signature Date

12 Response Due Date:  
10 Working days after issuance.

13. QAM Issuance Approval:  
Donald T. Krishna D. T. Krishna 6/11/02  
Printed Name Signature Date

14. Corrective Actions Verified/Closure:  
QAR Printed Name Signature Date

15. QAM Closure Approval:  
Printed Name Signature Date

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

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**CONDITION ADVERSE TO QUALITY CONTINUATION PAGE**

Description of Condition:

3. Transmittal No. C-02-0007-00 indicates the submittal of LP-OM-027Q-BSC, Rev. 0, ICN 2, for the requirement of Spec. 01501 Paragraph 3.01 S3.d. Contrary to this, Specification 01501 requires the submittal of LP-OM-027Q-BSC to Paragraph 3.02B.2. The RCR report has N/A in the space for the name of the A/E reviewer, however, there is a statement that the procedure was pre-approved by the A/E in accordance with Spec. Section 01300, Paragraph 2.11. The RCR also states, "Editorial change to remove notes under DR: BSC-02-064 actions, no review is required under AP-5.1Q. Contrary to this, the revision is not an editorial change in accordance with the definition of editorial change in AP-5.1Q.
  
4. The Constructor submitted RCR, Transmittal No. C-02-0007-00, to the A/E for the pre-approval of LP-OM-041Q-BSC, Rev. 0, ICN 1 for specification requirements 01501 paragraph 3.01 O.3 and 01502 paragraph 3.01 O.2. Contrary to this, the RCR reports have N/A in the space for the name of the A/E reviewer, however, there is a statement that the procedure was pre-approved by the A/E in accordance with Spec. Section 01300, Paragraph 2.11. The RCR also states, "Editorial change to remove notes under DR: BSC-02-064 actions, no review is required under AP-5.1Q." Contrary to this, the revision is not an editorial change in accordance with the definition of editorial change in AP-5.1Q.
  
5. There is no objective evidence that the below listed procedures have been submitted to A/E for review and approval or an RCR submitted for the referenced specification requirement(s): (Some procedures are required to be submitted to satisfy more than one specification)
  - a. LP-OM-027Q-BSC, Rev. 0, ICN 1, Effective date 10/08/01 for Spec. Section 01502, Paragraphs 3.01I and 3.02B.2.
  - b. LP-OM-027Q-BSC, Rev. 0, ICN 2, Effective date 03/18/02 for Spec. Section 01502, Paragraph 3.01I and 3.02B.2.
  - c. LP-EM-001Q-BSC, Rev. 0, ICN 0, Effective date 03/18/02 for Spec. Section 01501, Paragraph 3.01M.
  - d. LP-OM-042Q-BSC, Rev. 0, ICN 1, Effective date 04/08/02 for Spec. Section 01501, Paragraph 3.01J.
  - e. LP-OM-050Q-BSC, Rev. 0, ICN 0, Effective date 04/15/02 for Spec. Section 01800, Paragraphs 3.01D, 3.03A and 3.04B.
  - f. LP-OM-041Q-BSC, Rev. 0, ICN 1, Effective date 02/18/02 for Spec. Section 01502, Paragraph 3.01N.1.