



Department of Energy

Washington, DC 20585

QA: QA

JUL 02 2002

Janet R. Schlueter
High Level Waste Branch
Division of Waste Management
Office of Nuclear Material Safety & Safeguards
U.S. Nuclear Regulatory Commission
Two White Flint North
Rockville, MD 20852

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM) QUALITY ASSURANCE (QA) AUDIT OBSERVER INQUIRY FROM AUDIT LLNL-ARC-02-07

As a result of the OCRWM Office of Quality Assurance Audit LLNL-ARC-02-07 of the Lawrence Livermore National Laboratory, conducted April 15-19 2002, an Audit Observer Inquiry pertaining to a QA issue was generated. Enclosed is the response to the inquiry initiated by U.S. Nuclear Regulatory Commission Observer, K. R. Naidu.

It is anticipated that the response provided herein will be acceptable to your staff. If you have any questions or desire further information, please contact me at (702) 794-1460.

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

OQA:RBM-1322

Enclosure:
OCRWM Audit Observer Inquiry Form
Audit LLNL-ARC-02-07

cc w/encl:
James Blaylock, DOE/OQA (RW-3), Las Vegas, NV
R. M. Latta, NRC, Las Vegas, NV
T. C. Gunter, DOE/YMSCO, Las Vegas, NV
D. T. Krishna, BSC, Las Vegas, NV
K. A. Hodges, NQS, Las Vegas, NV
R. P. Hasson, NQS, Las Vegas, NV
E. P. Opelski, NQS, Las Vegas, NV
File, NQS, Las Vegas, NV
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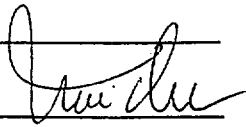
*Add. Janet Schlueter
NMS507
2/11/11*



**OCRWM
AUDIT OBSERVER INQUIRY**

Audit No.: LLNL-ARC-02-07 , dated 4/15-19/02

Log No.: 01

Name: K.R. Naidu 

Organization: U.S.N.R.C.

Requirement Reference: Welded-Metal Plates & Services Supplied
by Framatome

QUESTION/CONCERN

Question/Concern: DOE is to establish if its M&O contractor implemented the provisions of OCRWM QA Program, as described in DOE/RW-0333P in the procurement of purchase of materials and non-destructive examination services related to welded-metal plates supplied to LLNL. The audit team observed several C-22 and titanium metal pieces affixed with "Hold" tags because receipt inspections could not be performed. The audit determined that LLN does not have the purchase orders (POs) to determine the information to complete its receipt inspections to determine the acceptability of the welded plates it received from Framatome. LLNL is unable to complete its receipt inspections of welded plates received from Framatome because it has to extract the information for its various quality-related attributes from the POs which have not been supplied to LLNL.

Concern: If it identifies a problem in this area, it is expected that DOE will investigate if similar problems are prevalent in the purchases of other materials and services for the Yucca Mountain Project.

Response:

See Attached

Observer's Acknowledgement

Cleared for Submittal to Affected Organization


Auditor/Technical Specialist

Incorporated in Audit Checklist ... Reference

N/A


Audit Team Leader

BSC Response to OCRWM AUDIT OBSERVER INQUIRY, LLNL-ARC-02-07, Log No. 01, K. R. Naidu, U. S. N. R. C., Requirements Reference Welded-Metal Plates & Services Supplied by Framatome during the audit of LLNL.

Question/Concern:

DOE is to establish if its M&O contractor implemented the provisions of OCRWM QA Program, as described in DOE/RW-0333P in the procurement of materials and nondestructive examination services related to welded-metal plates supplied to LLNL. The audit team observed several C 22 and titanium metal pieces affixed with "HOLD" tags because receipt inspections could not be performed. The audit determined that LLNL does not have the purchase orders (POs) to determine the information to complete its receipt inspections to determine the acceptability of the welded plates received from Framatome. LLNL is unable to complete the receipt inspections of welded plates received from Framatome because it has to extract the information for its various quality-related attributes from the POs, which have not been supplied to LLNL.

Concern:

If it identifies a problem in this area, it is expected that DOE will investigate if similar problems are prevalent in the purchase of other materials and services for the Yucca Mountain Project.

Inquiry Response/Conclusion:

BSC developed, approved, and transmitted the procurement document to LLNL in accordance with the OCRWM QA Program implementing Procedure AP-7.6Q as required. LLNL had the required BSC "Statement of Technical and Quality Requirements" in March 2002, but due to a lack of communications, LLNL thought that there were additional POs required for the acceptance of the welded plate. This was subsequently resolved.

At the time of the audit no quality documentation package had been received by LLNL to complete their receipt acceptance of the "A" series plates. The plates were placed on "HOLD per AP-15.2Q, "Control of Nonconformances," pending receipt of the Framatome quality documentation package. BSC is in communication with Framatome to provide a copy of the quality documentation package to LLNL to complete their acceptance of the "A" series plates in accordance with AP-7.7Q, "Acceptance of Items and Services."

At the time of the audit, the BSC Responsible Manager had not decided if this Ti-7 plate (tool) would be used in the future. This plate was "red tagged" and placed on Hold at LLNL in accordance with AP-15.2Q, "Control of Nonconformances," pending a decision.

It was determined through this investigation that BSC had implemented the provisions of

the QA Program as described in the OCRWM DOE/RW-0333P "Quality Assurance Requirements and Description," and due to the unusual circumstances that this was an isolated incident. No similar occurrences were noted.

Background:

Framatome was contracted to fabricate C 22 Alloy welded plate in accordance with their ASME Section III approved QA Program. A supplemental "Statement of Quality and Technical Requirements, Revision 00, 02/14/2001," was issued to the Framatome ANP Subcontract A20241GN1S, Fiscal Year 2001, in accordance with Implementing Procedure AP-7.6Q, Revision 0, ICN 1, "Procurement of Items and Services." (This is the only Procurement Document required for the procurement and receipt of the C 22 Alloy welded plate at LLNL.)

One Ti-7 plate (tool) produced during the Framatome ANP FY-99 development program was released for shipment to LLNL at the request of the BSC Responsible Manager. This plate was received at LLNL with a Framatome "Authorization to Ship" form, and placed on "HOLD" per AP-15.2Q, "Control of Nonconformances" pending BSC Management direction. (an NCR has not been issued.)

Originally it was intended that the welded C 22 Alloy plate fabricated by Framatome was released for shipment on an as needed basis by the BSC Responsible manager from the Framatome facility to various subcontractors to manufacture metal test samples and coupons. The primary subcontractor for this activity was "Metals Samples Co (MSC)" of Munford, AL.

Corrective Action Report (CAR) BSC(V)-02-C-002, was issued to MSC on 11/15/01. MSC was subsequently restricted from manufacturing any additional samples and a new subcontractor had not been selected. Framatome had completed its fabrication of the welded plates and informed the BSC Responsible Manager that they needed to turn over the remaining welded plate. At this point the BSC Responsible Manager authorized Framatome to ship the remaining plate to the LLNL facility in California.

When the welded plates identified as, A-1, A-2, A-4, A-5, & A-6, arrived at LLNL they were placed on "Hold" at LLNL pending receipt of the Framatome documentation package from the BSC Responsible Manager. These plates were shipped to LLNL without the quality documentation package as requested by the BSC Responsible Manager.