



Department of Energy

Washington, DC 20585

QA: QA

AUG 08 2002

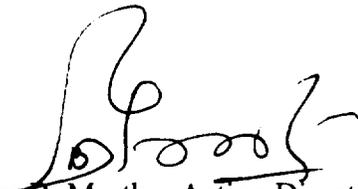
W. W. Watson
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EVALUATION OF AMENDED RESPONSE TO, VERIFICATION OF CORRECTIVE ACTIONS AND CLOSURE OF DEFICIENCY REPORT (DR) BSC-02-D-096

The Office of Quality Assurance staff has evaluated the amended response to, verified the corrective actions of DR BSC-02-D-096 and determined the results to be satisfactory. As a result, the DR is considered closed.

This deficiency involved the inadequate removal of obsolete documents from the Office of Civilian Radioactive Waste Management Program Document Database. No impact to waste isolation, safety, work quality or technical data was identified.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or James V. Voigt at (702) 794-1487.



Ram B. Murthy, Acting Director
Office of Quality Assurance

OQA:JB-1567

Enclosure:
DR BSC-02-D-096



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AUG 08 2002

cc w/encl:

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RADIOACTIVE WASTE MANAGEMENT
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ORIGIN
8. DEFICIENCY REPORT

CORRECTIVE ACTION REPORT

NO. BSC-02-D-096

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DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document:

QARD DOE/RW-0333P R10, AP-2.21Q R-1, BSCN 1, AP-6.1Q R-6 ICN 4

2. Related Report No.:

CIRS 1268,

3. Responsible Organization:

PROJECTS
BSC DOCUMENT CONTROL *AVS 3/26/02*

4. Discussed With:

Cindy Humphries-Alder, Michelle Prater, Bill Watson

5. Requirement:

- 1) QARD 6.2.5 states "The disposition of obsolete or superceded documents shall be controlled to ensure that they are not used to perform work."
- 2) AP-2.21Q R-1, BSCN 1, Section 2.0 states that "If there is no change in the workscope (activity), existing planning documents and/or technical product development plans completed under previous procedures do not require revision. Such existing evaluations and planning documents that provide necessary detail and still adequately address the activities and products in the new work packages shall be appended to the new TWP per Subsection 5.7 of this procedure.."
- 3) AP-6.1Q R-6 ICN 4 Para. 5.7.2 requires document owners (Responsible Individuals) to review (continued p.3)

6. Description of Condition: Contrary to 1) above, there are 352 documents in the Lotus Notes Data Base (OCRWM's Source for Controlled Documents) that are (a) superceded by existing TWP's, or (b) should have been superceded by a TWP with the implementation of AP-2.21Q. These include 286 Technical Document Plans (TDP) and 66 Work Planning Packages (WPP). An example is that TDP-CRW-SE-000003 still exists as a controlled document but was incorporated as Addendum C to TWP-WAT-MD-000001 R-0, also a controlled document. The TDP should have been decontrolled. Contrary to 2) there are 352 "controlled" TDP/WPPs in the Lotus Notes Database and any TDP or WPP that is still valid should have been appended to a TWP in accordance with AP-2.21Q and that TDP or WPP decontrolled. (continued p.3)

7. Initiator:

Ken O Gilkerson
Ken O Gilkerson BSC QA

Date 03/22/02

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:

- 1) Discontinue use of obsolete TDPs and WPPs.
- 2) Remove from Lotus Notes Program Document Database.

11. QA Review:

James V. Voigt
QAR James V. VOIGT Date 27 March 2002

12. Response Due Date:

10 Working Days From Issuance

13. DOQA Issuance Approval:

Printed Name Ram Murthy

Signature *Ram Murthy* Date 7/7/02

22. Corrective Actions Verified:

James V. Voigt
QAR James V. VOIGT Date 7/18/2002

23. Closure Approved by:

DOQA *[Signature]* Date

Exhibit AP-16.1Q.1

Rev. 12/20/1999

ENCLOSURE

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8. DR/CAR
 Stop Work Order
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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

BLOCK 5 (continued): documents on an annual basis and identify to document control any "controlled" documents that require decontrol or transfer to another document holder.

BLOCK 6 (continued)

Contrary to 3) above, document owners (responsible individuals) have not identified the need to decontrol TDP/WPPs.

DISCUSSION: The AP-2.21Q work planning procedure superseded AP-2.13Q (TDPs) and AP-2.15Q in August of 2000. It recognized that some of the existing TDP's might provide adequate detail for planning for FY01 and allowed appending the TDP to the TWP to control planning activities for the subject work scope (assuming nothing in the work scope etc changed). However, the use of existing TDPs for planning was an interim measure. It is now 2002 and it is unlikely that nothing has changed in existing planning documents relative to work. Procedures and requirements have changed extensively as well as scheduled activities. All TDP/WPPs should have been decontrolled by now due to them being appended to a TWP or due to them being superseded by a TWP.

CIRS Item 1268, issued 1/18/01, identified superseded TDPs and WPPs were on the OCRWM Program Document Database (OPDD) as controlled documents. Documents could not be decontrolled/canceled without Document Owners initiating Document Control Action Requests (DCARs). The annual Document Owner's Report (for plans) [now called Responsible Individual's Annual Report] issued by Document Control in the spring of 2001 directed Document Owners to identify planning documents that had been superseded, or that were no longer needed, and to initiate the corresponding DCARs per AP-6.1Q. Contrary to the requirements in block 5, and to actions taken by Document Control related to CIRS Item 1268, DCARs were not initiated and 352 TDPs and WPPs are still active on the OPDD.

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2. Check if Amended

3. Extended Processing

No Yes (If yes, submit Extended Processing request)

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1. DR/CAR NO. BSC-02-D-096

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DEFICIENCY REPORT/CORRECTIVE ACTION REPORT INITIAL RESPONSE

4. Immediate Actions Necessary to Bring the Process Under Control: (If none, provide justification statement)

By April 26, 2002, Project Managers Robert Andrews, Stephen Cereghino and Larry Trautner will send out a memo to each Sub-Product Manager and Technical Work Plan Manager directing them to ensure that all planning documents are prepared in accordance with AP 6.1Q and that all planning documents are cancelled or superseded as appropriate. The memo will ask each manager to respond by e-mail to acknowledge both receipt and understanding of the action.

Date when process will meet requirements: April 26, 2002

5. Immediate Remedial Actions Completed:

In response to DR-BSC-02-D-096, Document Control issued "DR-096 Action Plans Report" April 18, 2002. This report identifies the controlled plans (e.g., TWPs, TDPs, WPPs) called out in this DR by responsible individual and identifies actions necessary to either keep the document current, cancel the document or identify the document has been superseded by another plan (identify the document as called out in AP 6.1Q). The report issued by Document Control was not limited to the 352 documents called out in the DR, allowing for the opportunity to resolve overlooked documents.

6. Plan for Determining the Extent of Condition:

The extent of condition will be determined by identifying the population of candidates for cancellation or superseding. Each "responsible individual" will accomplish this as they make the status selection on the report issued by document control. However, there have been several changes in the BSC organization, as a result some document owners may no longer be on the project or have been reorganized. This will take some time to resolve. As a result of this condition, the completion of this action will be May 31, 2002.

7. Due Date for Submittal of Completed Response:

May 31, 2002

8. Response by: (Responsible Manager)

William Watson William Watson 4/22/02
Printed Name Signature Date

9. QAR Evaluation: Accept Partially Accept Reject

James V. VOIGT James Voigt 4-30-02
Printed Name Signature Date

10. QAM Concurrence:

Ran MURPHY James Blaylock 5/2/02
Printed Name Signature Date

Submittal Page 1 of 1
 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)
 Initial review of the plans managed by document control identified a total of 1129 plan documents. Document owners were instructed to confirm the status of each plan as CURRENT or OBSOLETE. This effort resulted in the identification of 352 documents requiring remedial actions

5. Impact: (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)
 There are no impacts relative to waste isolation and safety or impacts to other work. The plan documents in question represent previous work scope plans and have been determined in nearly all cases that they were not being used. The remaining documents should be replaced with Technical Work Plans and properly dispositioned.

6. Remedial Actions: (Document all actions necessary to address the results of the Extent of Condition)
 Actions of this report asked each document owner to properly disposition the Technical Document Plans (TDP) and Work Planning Packages (WPP) in accordance with AP 6.1Q.
347 WPPs/19/02
 Of the 352 documents, ~~348~~ have been/being cancelled or superseded.
 Replace or supersede the remaining documents (WPP-MGR-MD-000029, WPP-MGR-MD-000030, WPP-MGR-MD-000044, WPP-MGR-MD-000045, and TDP-NBS-HS-000097) by July 19, 2002.

7. Root Cause (For a significant CAQ, attach results of formal root cause determination prepared in accordance with AP-16.4Q)
 Apparent Cause
 The apparent cause was a lack of attention of the document owner to properly disposition these documents during the annual request by Document Control.

8. Action to Preclude Recurrence: (Address those actions necessary to prevent the identified cause from recurring)
 On April 26, 2002, Project Managers R. Andrews, S. Cereghino, and L. Trautner issued an e-mail to each of their sub-product managers directing each to ensure that all future planning documents be maintained in accordance with AP 6.1Q.

9. Due Date for Completion of Corrective Action::
 July 19, 2002

10. Responsible Manager *JE DeBhart BSC QA 5/31/02*
William Watson *William Watson* *5/31/02*
 Printed Name Signature Date

11. QAR Evaluation: Accept Partially Accept Reject
Not significant JUV 6-18-02
James V VOIGT *James V. Voigt* *6-5-02*
 Printed Name Signature Date

12. QAM Concurrence:
RAM MURTHY *James B. Blaylock jr* *6/14/02*
 Printed Name Signature Date

Submittal Page 1 of 1

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)
Initial review of the plans managed by document control identified a total of 1129 plan documents. Document owners were instructed to confirm the status of each plan as CURRENT or OBSOLETE. This effort resulted in the identification of 352 documents requiring remedial actions

5. Impact: (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)
There are no impacts relative to waste isolation and safety or impacts to other work. The plan documents in question represent previous work scope plans and have been determined in nearly all cases that they were not being used. The remaining documents should be replaced with Technical Work Plans and properly dispositioned.

6. Remedial Actions: (Document all actions necessary to address the results of the Extent of Condition)
Actions of this report asked each document owner to properly disposition the Technical Document Plans (TDP) and Work Planning Packages (WPP) in accordance with AP 6.1Q. Of the 352 identified plan documents, 351 have been cancelled or superseded.

AP-2.21Q is the controlling document for this DR, see Block 1; AP-2.21Q however, has been superseded effective 6/28/02 by AP-2.27Q and the requirement to incorporate TDPs into TWP has been eliminated with the cancellation of AP-2.21Q.

The only remaining TDP plan, TDP-NBS-HS-000097, now falls under the control of AP-2.27Q that will be followed to resolve any required updates to the plan. This specific action will be completed outside the scope of this DR because AP-2.21Q processes are no longer valid

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

Apparent Cause

The apparent cause was a lack of attention of the document owner to properly disposition these documents during the annual request by Document Control.

8. Action to Preclude Recurrence: (Address those actions necessary to prevent the identified cause from recurring)
On April 26, 2002, Project Managers R. Andrews, S. Cereghino, and L. Trautner issued an e-mail to each of their sub-product managers directing each to ensure that all future planning documents be maintained in accordance with AP 6.1Q.

9. Due Date for Completion of Corrective Action::

E. W. W. 7/2/02
July 19, 2002

10. Responsible Manager

GE Dechant 7/8/02
William Watson *William Watson* *7/8/02*
Printed Name Signature Date

11. QAR Evaluation: Accept Partially Accept Reject

James V. Voigt *James V. Voigt* *11 July 02*
Printed Name Signature Date

12. QAM Concurrence:

RAM Murthy *RAM Murthy* *8/8/02*
Printed Name Signature Date

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 SWO

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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

BLOCK 4 – IMMEDIATE ACTIONS/EXTENT OF CONDITION

Immediate Action Commitment: (1) Project Managers (R. Andrews, S. Cereghino and L. Trautner) to issue a memo to Technical Work Plan managers directing them to maintain planning documents in accordance with AP 6.1Q and cancel or supersede them as appropriate. (2) Document Control issued 'DR-096 Action Plans Report' 4/18/02 to all known document owners of controlled plans (1129), this exceeded the 352 documents specified in the DR description of condition.

Verification: (1) Verified issuance of e-mail by Robert Andrews dated 4/25/02 to Technical Work Plan managers M Peters, P Swift, T Doering and Paul Dixon entitled Controlled Documents. Verified issuance of e-mail by Steve Cereghino dated 4/25/02 to Technical Work Plan managers Donald Beckman, Marty Bryan, Jan Dionisio, William Hutchins, Alan Nakashima, Dennis Richardson, and David Siefken entitled Controlled Documents. Verified regeneration of e-mail issued earlier by Larry Trautner dated 7/17/02 to Technical Work Plan managers Muthuraman Iyer, Robert Boutin, Jack Cloud, Gene Rowe and Halit Dokuzoguz entitled BSC-02-D-096 Controlled Documents. (2) Examined Action Plans Reports generated by Document Control and issued to Document Owners, which appeared satisfactory. Verification satisfactory.

Extent of Condition Commitment: Examine planning documents resident in the OCRWM Program Document Database to identify those plans managed by Document Control. 1129 potential documents were identified for owner assessment as to continued applicability. With management support Document Control obtained document owner status input on the 1129 planning documents.

Verification: Discussed with Dennis Thomas and confirmed that document control instructed document owners of the 1129 planning documents to evaluate plan and designate as either current or obsolete. 146 obsolete WPPs and 433 TDPs were identified as obsolete and were removed from controlled distribution (canceled). In addition it was determined that because AP-2.21Q had been canceled, 1 TDP involved with multiyear work efforts and applicable to current work would be appended under the current applicable procedure AP-2.27.

BLOCK 5 – IMPACT

Impact Actions: No actions were initiated, assessment reached concluded no impact relative to waste isolation, safety or technical work.

Verification: Agree with assessment of no impact on quality of products or data as current action status was being investigated not technical adequacy.

BLOCK 6 – REMEDIAL ACTIONS

Commitment: (1) Immediate actions involved Document Control issuing Action Plans Report on or around 4/18/02 to define current action status for planning documents. 1129 document owners were queried, responses were recorded on the Action Plan Report, resulting in all 146 obsolete WPPs and all but one of the 434 TDPs being removed from the controlled document database.

Verification: (1) Examined OCRWM Program Document Database and confirmed that all WPPs were removed and all but one TDP had been removed. Discussed status of remaining TDP and agreed with explanation that TDP actions were still active and were being appropriately updated under AP-2.27Q since AP-2.21 had been canceled and no longer controlled the activity.

Note: Implementation of a requirement from AP-2.21 is the basis for this DR, and with the cancellation of AP-2.21 the above action seemed appropriate. Verification satisfactory.

BLOCK 7 – CAUSE

The cause of the deficient condition identified in this DR – lack of attention by document owners to AP-6.1Q requirement - is reasonable based upon the 5/31/02 response.

BLOCK 8 – ACTION TO PRECLUDE RECURRENCE

Action to preclude recurrence is defined in block 4 Extent of Condition. Actions defined in block 4 may be sufficient to prevent condition recurrence, dedication to procedural details from document owners is necessary for compliance to be successfully implemented.

Based upon the satisfactory verification of corrective action commitments described above, it is recommended that this DR be closed.

 7/18/2002
James V. Voigt Date