



Department of Energy

Washington, DC 20585

QA: QA

AUG 08 2002


M. G. McDaniel
Bechtel SAIC Company, LLC
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VERIFICATION OF CORRECTIVE ACTIONS AND CLOSURE OF DEFICIENCY REPORT (DR) BSC-02-D-095

The Office of Quality Assurance staff has evaluated the corrective actions of DR BSC-02-D-095 and determined the results to be satisfactory. As a result, the DR is considered closed.

This deficiency involved the change process for technical work plans. 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-1392

Enclosure:
DR BSC-02-D-095



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NMSSO-7
wm-11

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cc w/encl:

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ORIGINAL
DEFICIENCY REPORT
☒ DEFICIENCY REPORT
☐ CORRECTIVE ACTION REPORT
NO. BSC-02-D-095
PAGE 1 OF
QA: QA

DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document:
QARD, DOE/RW-0333P R10

2. Related Report No.:
N/A

3. Responsible Organization:

BSC Engineering

4. Discussed With:

J. Whitcraft, A. Burningham, Cindy Humphries-Alder

5. Requirement:

- 1) QARD 2.2.1.B: Affected organizations shall establish implementing documents.. that translate QARD requirements into work processes.
- 2) QARD 6.2.6.C: Implementing documents shall define the method used to incorporate changes. If this defined method is other than reissue of the entire controlled document, the implementing documents shall define the maximum number of changes permitted prior to requiring reissue of the entire controlled document.
- 3) QARD 6.2.5.B: Effective dates shall be established for approving implementing documents.
- 4) QARD 6.2.5.D: A method shall be established to identify the current status of each document.

6. Description of Condition: 1) Contrary to the above requirements AP-2.21Q Revision 1 is inadequate in that it does not properly translate applicable QARD requirements into work processes. Contrary to 1), 2) AP-2.21Q R-1 Section 5.7 prescribes the use of Addenda to add or update information to an existing approved Technical Work Plan (TWP) without "revising" the document. This adding/updating is a change. The procedure fails to identify the maximum number of such changes that can be done without a full revision (reissue) of the document. Nor is the process for *changing* the document by Addenda clearly defined in the procedure. It is not clear how the current status of the document is identified (i.e. a revision level designator is not clearly established in accordance with AP-6.1Q). See discussion below. Contrary to 1), 3), although the TWP cover sheet has a place on the form for an effective date, there is no process established in the procedure detailing how this date is determined, by whom and when. (continued)

7. Initiator:

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) Incorporate QARD requirements.
- 2) Revise procedure to remove use of Addendums in revision process.
- 3) Clarify the revision/change process for TWPs.

11. QA Review:

QAR James V. Voigt

Date 27 March 2002

12. Response Due Date:

10 Working Days From Issuance

13. DOQA Issuance Approval:
(Acting)

Printed Name Ram Murthy

Signature

James B. [Signature]

Date 4/8/02

22. Corrective Actions Verified:

QAR James V. Voigt

Date 6/20/2002

23. Closure Approved by:

DOQA

Date 8/8/02

Exhibit AP-16.1Q.1

Rev. 12/20/1999

ENCLOSURE

1 of 7

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8. ☒ DR/CAR
☐ Stop Work Order

NO. BSC-02-D-095

PAGE 2 OF
QA: QA

DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Block 6 continued:

Contrary to 1), 4), Although the (TWP) procedure prescribes that Addenda be submitted to document control to be processed in accordance with AP-6.1Q, Document Control requires a status indicator for any change document (i.e. Revision 1, Interim Change Notice 1, etc.). Addenda are a mechanism to supplement information for a document without changing the existing format. This procedure attempts to use Addenda as both a supplement and a change indicator (i.e. Addendum F). Addenda are not status indicators. Most of the issued TWPs have an Addenda A & B as part of their structure. For example Rev 0 of a TWP includes Addenda A (Activity Evaluation) and Addenda B (Sup V Process Control Evaluation). They appear in the controlled database as TWP-XXX-YY-ZZZZZZ R-0 with no notation of the Addenda A & B that are part of Revision 0. By later issuing an Addendum C (for example), there is no way to identify the current status of the document. If the TWP is depicted as TWP-XXX-YY-ZZZZZZ R-0 Addendum C, what happened to A & B as the first changes. They may already exist as part of Revision 0.

Discussion:

The AP-2.21Q inadequacies first surfaced fifteen months ago when BSC/M&O staff attempted to process TWP changes in accordance with the procedure. There have been few process problems as long as changes were incorporated to the TWP by using the full revision process depicted in the procedure. Problems have arisen when attempts to change a TWP by other means have occurred. Attempts to make interim changes by ICNs resulted in DR-02-D-008. ICNs are not a prescribed change mechanism for TWPs. Attempts to issue changes with addenda as *prescribed by the procedure* have resulted in confusion and difficulties. Document Control has rejected such attempts due to the lack of an adequate status designator to distinguish TWP versions. Continuing attempts by the line organization to *add* Addenda to TWPs without *revising* the documents have brought the programmatic issues to light once again. When the procedure owner was notified of these deficiencies last year, it was related that the procedure had numerous DARs against it and that the procedure was *being* revised and these issues would be addressed. The procedure is still *being* revised but there has been no resolution of these issues.

As an example, the recent OQA Audit of M&O/Headquarters (BSC-ARC-02-05) identified work at headquarters that was being conducted with an Addenda (to TWP-CRW-MD-000001 R-0) that had not been submitted to Document Control or Records. In response to the audit issue, BSC attempted to process the Addenda through Document Control without revising the TWP. Ultimately (on 03/11/02) BSC revised the TWP to Revision 1 to incorporate the Addenda. As another example, HQ submitted a stand alone Addenda D to update TWP-WAT-MD-000001R-0. This TWP had not been updated since November 2000. R-0, the initial of this TWP, already included Addenda A, B, & C.

③ JCS 3/26/02

Submittal Page 1 of 1

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-095

PAGE

OF

QA: QA

DEFICIENCY REPORT/CORRECTIVE ACTION REPORT INITIAL RESPONSE

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

Document Control has been informed via e-mail from James Whitcraft dated 04/22/02 that effective immediately an addendum to a Technical Work Plan (TWP) is to be issued by a revision of the TWP. Administratively this will assure complete compliance with the QARD.

Date when process will meet requirements: 04/23/02

5. Immediate Remedial Actions Completed:

No additional actions from block 4.

6. Plan for Determining the Extent of Condition:

TWPs identified in the OCRWM Program Document Database (OPDD) as of the date of the e-mail required in block 4 of this response will be evaluated to identify those TWPs with an addendum added other than by revision of the TWP. Disposition of those TWPs will be addressed in the Complete Response to DR BSC-02-D-095.

Estimated date of completion of the Extent of Condition is 05/10/2002.

7. Due Date for Submittal of Completed Response:
05/10/2002

8. Response by: (Responsible Manager)

Mary G. McDaniel Mary G. McDaniel 4-22-02
Printed Name Signature Date

9. QAR Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject

10. QAM Concurrence:

James V. Voigt James V. Voigt 4-23-2002
Printed Name Signature Date

Ran Murthy James Blaylock 4/23/02
Printed Name Signature Date

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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1. DR/CAR NO. BSC-02-D-095
PAGE OF
QA: QA

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)

There were 69 TWP's identified in the OCRWM Program Document Database as of 04/22/2002. Of those 69 TWP's only 5 were identified as having addendum(s) added other than by revision of the TWP.

(See continuation page)

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 and safety, quality, or other work. The deficiency identified is with the process of change for TWP's associated with procedure AP-2.21Q and not the technical content of the TWP's or products produced using the TWP's, therefore there is no impact on quality of products.

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

Three of the TWP's identified in Block 4, Extent of Condition will be cancelled in accordance with AP-6.1Q. Controlled Distribution since the work tasks associated with those TWP's is completed.

· TWP-MGR-MD-000008, Rev 0, Addendum F, Plan for the Calculation Consumption Rates of Locally Produced Food in NYE and Lincoln Counties

· TWP-MGR-MG-000001, Rev 1, Addendum D, Technical Work Plan For: Subsurface Design Section FY01 Work Activities

· TWP-WHS-MD-00010, Rev 0, Addendum B, Technical Work Plan For: Staging Pad Siting Study

(See continuation page) 5-14-02

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

Previous development and review process for AP-2.21Q failed to identify that use of an addendum for changing TWP's was not an appropriate vehicle for change and establishment of an effective date process to meet QARD requirements

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

As stated in the initial response to this DR "Document Control has been informed via e-mail from James Whitcraft dated 4/22/02 that effective immediately an addendum to a Technical Work Plan (TWP) is to be issued by a revision of the TWP. Administratively this will assure complete compliance with the QARD".

9. Due Date for Completion of Corrective Action:
6/14/2002

10. Responsible Manager:

Mary G. McDaniel

Printed Name

Signature

Date

11. QAR Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject

NOT SIGNIFICANT 5-13-2002

James V. Voigt

Signature

Date

12. QAM Concurrence:

Ran MURPHY

Printed Name

Signature

Date

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☒ DR/CAR/QO
☐ SWO

NO. BSC-02-D-095
PAGE OF
QA: QA

CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

4. Extent of Condition (Cont)

- TWP-MGR-EV-~~00001~~⁰⁰⁰⁰⁰¹, Rev 0 Addendum G, Technical Work Plan For: Biological Resources and Craft Support to Habitat Reclamation ^{8VV 5-14-02}
- TWP-MGR-MD-000008, Rev 0, Addendum F, Plan for the Calculation Consumption Rates of Locally Produced Food in NYE and Lincoln Counties
- TWP-MGR-MG-000001, Rev 1, Addendum D, Technical Work Plan For: Subsurface Design Section FY01 Work Activities
- TWP-MGR-MM-000001, Rev 0, Addendum D, Technical Work Plan For: Meteorological Monitoring and Data Analysis
- TWP-WHS-MD-~~00016~~⁰⁰⁰⁰¹⁶, Rev 0, Addendum B, Technical Work Plan For: Staging Pad Siting Study ^{8VV 5-14-02}

6. Remedial Actions (Cont.)

Two of the TWPs identified in Block 4, Extent of Condition will be revised in accordance with procedure AP-2.21Q to incorporate the addendums.

- TWP-MGR-EV-~~00001~~⁰⁰⁰⁰⁰¹, Rev 0 Addendum G, Technical Work Plan For: Biological Resources and Craft Support to Habitat Reclamation ^{8VV 5-14-02}
- TWP-MGR-MM-000001, Rev 0, Addendum D, Technical Work Plan For: Meteorological Monitoring and Data Analysis

Due Date for Completion of Remedial Action is 06/14/2002

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WASHINGTON, D.C.**

☒ DR/CAR/QO
☐ SWO

No: BSC-02-D-095

Page ____ of ____

QA: QA

CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

BLOCK 4 – IMMEDIATE ACTIONS/EXTENT OF CONDITION

Immediate Action Commitment: (1) Inform Document Control via e-mail that effective immediately an addendum to a Technical Work Plan (TWP) is to be issued by a revision of the TWP.

Verification: (1) Verified issuance of e-mail by James Whitcraft dated 4/22/02 to Senior Management and Document Control entitled Issuance of Addenda to Technical Work Plans.

Verification satisfactory.

Extent of Condition Commitment: Evaluate TWPs resident in the OCRWM Program Document Database to identify those TWPs with an addendum added other than by revision of the TWP.

Verification: Discussed with Hank Greene and confirmed that 69 TWPs were identified and evaluated. It was determined that 5 TWPs had addendum added other than by revision of the TWP.

BLOCK 5 – IMPACT

Impact Actions: No actions were initiated.

Verification: Agree with assessment of no impact on quality of products.

BLOCK 6 – REMEDIAL ACTIONS

Commitment: (1) 3 of the 5 TWPs identified in extend of condition will be canceled. (2) 2 of the 5 TWPs identified will be revised to incorporate the addendums.

Verification: (1) Reviewed OCRWM Program Document Database for canceled TWPs on 6/19/2002 and verified that TWP-MGR-MD-000008, TWP-MGR-MG-000001, and TWP-WHS-MD-000016 were canceled 5/16/02, 5/21/02 and 5/16/02 respectively.

(2) Reviewed OCRWM Program Document Database for revised TWPs on 6/19/2002 and verified that TWP-MGR-EV-000001 (Revision 1, complete 5/14/02, MOL.20020522.0140) and TWP-MGR-MM-000001 (Revision 1, complete 5/30/02, MOL.20020530.0386) were revised.

Verification satisfactory.

BLOCK 7 – CAUSE

The cause of the deficient condition identified in this DR is reasonable based upon the 5/9/02 response. Staff misinterpreted procedure and implemented aspects of procedure in an inappropriate manner

BLOCK 8 – ACTION TO PRECLUDE RECURRENCE


No action committed/required. Actions defined in block 4 will be sufficient to prevent condition recurrence.

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

James V. Voigt 6/20/2002
James V. Voigt Date

*DR cross reference request to Records Processing Center against the three canceled TWPs was confirmed. JVV
6-25-2002*

QA:QA_{D60}

 Mary McDaniel
06/24/2002 06:02 PM

To: Sharon Harris-Wornack/YM/RWDOE@CRWMS
cc: James Voigt/YD/RWDOE@CRWMS, Charles Bartley/YM/RWDOE@CRWMS
Subject: DR BSC-02-D-095 cross-reference to record packages

User Filed as: Exec/AdminMgmt-14.4/OA-N/A

D60
6/26/02

Sharon,

To support to closure of DR BSC-02-D-095, I am requesting that you cross reference DR BSC-02-D-095 to the following three record packages:

TWP-MGR-MD-000008, Rev 0, Addendum F, Plan for the Calculation Consumption Rates of Locally Produced Food in NYE and Lincoln Counties (MOL.20020530.0398)

TWP-MGR-MG-000001, Rev 1, Addendum D, Technical Work Plan For: Subsurface Design Section FY01 Work Activities (MOL.20020524.0085)

TWP-WHS-MD-000016, Rev 0, Addendum B, Technical Work Plan For: Staging Pad Siting Study (DC tracking # 32636 - Being submitted to RPC by DC)

Should you have any questions, please contact Charlie Bartley or myself.

Thank you in advance,

Mary