



Department of Energy

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QA: QA

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U.S. DEPARTMENT OF ENERGY OFFICE OF CIVILIAN RADIOACTIVE WASTE
MANAGEMENT OBSERVATION REPORT OQA-02-OR-05 OF BECHTEL SAIC
COMPANY, LLC (BSC) QUALITY ASSURANCE (QA) SURVEILLANCE BSCQA-02-S-37

Enclosed is an Observation Report performed by a representative of the Office of Quality Assurance of BSC's Surveillance, BSCQA-02-S-37, which was conducted by the BSC QA Organization on July 8-12, 2002, at BSC's facilities in Las Vegas, Nevada.

The purpose of the observance activity was to determine the adequacy of the BSC QA surveillance process in evaluating the effectiveness of the "Technical Error Reporting Process."

Based on the observation of the surveillance, it was determined to be adequate and effective. The observer concurred with the BSC QA surveillance conclusions resulting in one quality observation and four recommendations.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or F. Harvey Dove at (702) 794-5025.


Ram B. Murthy, Acting Director
Office of Quality Assurance

OQA:JB-1646

Enclosure:
Observation Report OQA-02-OR-05



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QA: QA

**U.S. DEPARTMENT OF ENERGY
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
OFFICE OF QUALITY ASSURANCE**

OBSERVATION REPORT

OF

**BECHTEL SAIC COMPANY, LLC
YUCCA MOUNTAIN PROJECT**

**SURVEILLANCE BSCQA-02-S-37
TECHNICAL ERROR REPORTING PROCESS**

CONDUCTED AT LAS VEGAS, NEVADA

JULY 8-12, 2002

Prepared by:

F. Harvey Dove

F. Harvey Dove
Observer
Navarro Quality Services

Date: 08/06/02

Approved by:

Ram B. Murthy

Ram B. Murthy
Acting Director
Office of Quality Assurance

Date: 8/21/02

ENCLOSURE

1.0. INTRODUCTION

The Office of Civilian Radioactive Waste Management (OCRWM) Office of Quality Assurance (OQA) representative observed the Bechtel SAIC Company, LLC (BSC) Quality Assurance (QA) surveillance team perform Surveillance BSCQA-02-S-37, which was conducted July 8-12, 2002. The purpose of the observation was to determine the adequacy of the surveillance process used to assess the "Technical Error Reporting" (TER) process.

The BSC QA surveillance began with a compliance review of TERs for conformance with the requirements of AP-15.3Q, Revision 0, *Control of Technical Product Errors*. The surveillance team also evaluated the overall effectiveness of the TER process.

The surveillance was conducted in accordance with AP-2.26Q, Revision 0, *Quality Assurance Surveillance*.

2.0 OBJECTIVE

This report summarizes the observer's evaluation of the BSC surveillance process and the ability of the BSC QA surveillance team to perform a TER compliance review with procedure AP-15.3Q.

3.0 SURVEILLANCE PARTICIPANTS/ORANIZATION/FUNCTION

Jerry Heaney	BSC QA/Surveillance Team Lead
Jeffrey D. Weaver	BSC /Technical Specialist
F. Harvey Dove	Navarro Quality Services/Observer
Robert Latta	Nuclear Regulatory Commission (NRC)/Observer

4.0 REVIEW OF THE SURVEILLANCE PROCESS

The BSC surveillance activity was observed to determine the surveillance team's implementation of the AP-2.26Q surveillance process in adequately evaluating the TER process. The observer's evaluation was based on observation of the surveillance team's activities, a review of the objective evidence, and discussions with the surveillance team and NRC observer.

The Surveillance Team Leader reviewed the overall progress of the surveillance on a regular basis with the OQA observer, kept the surveillance on schedule, and reviewed the status of the surveillance and discussed concerns with BSC personnel on a regular basis.

The surveillance team members freely communicated information within the team and to responsible BSC personnel, which contributed to the overall effectiveness of the surveillance.

The surveillance team's interviews and reviews of objective evidence were thorough to the extent necessary to determine the effectiveness of the TER process. The surveillance team conducted the surveillance in a professional manner, interacted well with the staff, and kept management informed on the progress of the surveillance and the status of concerns. The surveillance team findings are discussed below.

Comment

The surveillance team identified one potential quality observation, as follows:

- Deficiency Document Encoding Forms (DDEF) have not been completed by Quality Engineering Representatives (QERs) in accordance with AP-15.3Q, Section 5.5.3 g).
- DDEF forms for four validated and dispositioned TERs could not be located. The responsible QERs were contacted during the surveillance and DDEF forms were generated and submitted to the Trend Coordinator as required.
- The TER numbers were TER-02-0008, -0009, -0010, and -0012.

The surveillance team identified four recommendations, as follows:

1. Timeliness of TER Validation and Disposition (*Potential Condition/Issue and Reporting/Resolution System (CIRS) Item*)

Review indicates:

- At least 11 TERs initiated prior to 2/28/02 were not validated until 7/3/02. A timeframe of 5 months.
- At least 17 TERs initiated prior to 2/28/02 were not dispositioned until 6/30/02. A timeframe of 4 months.
- At least 18 TERs initiated prior to 2/28/02 have not been dispositioned as of 7/8/02. A timeframe of 5 months.

Process Improvement Recommendation:

Revise AP-15.3Q to incorporate a 30-day timeframe to validate and disposition TERs. If a disposition cannot be provided until other issues are settled, provide a cause for the delay on the TER, and provide a projected date that a disposition can be obtained.

2. TER Action Tracking (*Potential CIRS Item*)

AP-3.15Q does not contain or refer to an action tracking system to ensure actions associated with TERs are identified and tracked.

Process Improvement Recommendation:

Track TER action items in the CIRS database, which continuously identifies when an action item is due. In addition, actions to revise documents resulting from a TER disposition of "Correct" can also be identified and tracked until completion. Revise AP-3.15Q to require TER action items be identified as a CIR item.

3. TER Status (*Potential CIRS Item*)

The "Technical Error Report Log" maintained by the TER Coordinator should be accessible as a database on the Lotus Notes Database System enabling responsible managers to status TERs without having to contact the TER Coordinator.

Process Improvement Recommendation:

Implement the "Technical Error Report Log" as a Yucca Mountain database as soon as possible.

4. Errata Sheets should be generated and issued for "Use-As-Is" dispositions (*Potential CIRS Item*)

Review of several TERs dispositioned "Use-As-Is" clearly indicates that errors are present in some approval documents. AP-15.3Q does not require TERs dispositioned "Use-As-Is" to have an Errata Sheet generated and posted to approved documents identifying the errors listed in the TER. Users of these documents receive no notification that the documents contain errors.

Process Improvement Recommendation:

Revise AP-3.15Q to require an Errata Sheet to be attached to a "Use-As-Is" disposition on a technical document.

5.0 CONCLUSION

Conduct of the surveillance was adequate and effective. The observer agrees with the surveillance team's conclusion that of one potential quality observation and four recommendations. In addition, the following OQA observations were noted relative to the surveillance:

- 1) The surveillance team was organized, prepared, and worked well together. Surveillance team members were knowledgeable of procedure AP-15.3Q; and
- 2) Observer questions were promptly addressed. The surveillance team appropriately involved the observer in the surveillance process.