



Department of Energy

Washington, DC 20585

QA: QA

OCT 07 2002

K. G. Hess
President and General Manager
Bechtel SAIC Company, LLC
1180 Town Center Drive, M/S 423
Las Vegas, NV 89144

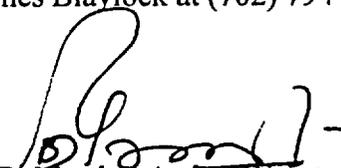
REISSUANCE OF DEFICIENCY REPORT (DR) BSC-02-D-090 AS CORRECTIVE ACTION REPORT (CAR) BSC-02-C-090

Recent observations at the site regarding implementation of Tracers, Fluids, and Materials (TFM) controls have noted continuing problems. Based on reassessment of TFM issues documented on Deficiency Identification and Referral (DIR) 02-18 to DR BSC-02-D-090, a recommendation was made by Bechtel SAIC Company, LLC (BSC) Quality Control personnel that this DR represents a Significant Condition Adverse to Quality. The Office of Quality Assurance, after additional meetings regarding this subject, agrees that the issue is significant and is reissuing DR BSC-02-D-090 as CAR BSC-02-C-090 in accordance with AP-16.1Q, *Management of Conditions Adverse to Quality*.

Attached is the documentation prepared to date that reflects a change in status to a Significant Condition Adverse to Quality. In response to this reissuance, BSC is requested to provide an amended initial response that identifies immediate actions taken to bring the process under control. A formal root cause determination is now required. The revised response may take credit for appropriate actions already completed. Since the issue already has an approved Request for Extended Processing, no additional request is required unless BSC's actions substantially change or do not allow completion by the approved date of 12/30/02.

Please provide the amended initial response within 10 working days of the date of this letter.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or John R. Doyle at (702) 794-5021.


Ram B. Murthy, Acting Director
Office of Quality Assurance

OQA:JB-0032

Enclosure:
CAR BSC-02-C-090



Printed with soy ink on recycled paper

NM5507
WM-11

OCT 07 2002

cc w/encl:

Margaret Chu, DOE/HQ (RW-1), FORS
N. K. Stablein, NRC, Rockville, MD
Robert Latta, NRC, Las Vegas, NV
Leon Fossum, BSC, Las Vegas, NV
R. E. Fray, BSC, Las Vegas, NV
D. T. Krisha, BSC, Las Vegas, NV
J. S. Whitcraft, BSC, Las Vegas, NV
J. H. Hayes, BSC, Mercury, NV, M/S 763
R. L. Noel, BSC, Mercury, NV, M/S 755
J. R. Doyle, NQS, Las Vegas, NV
W. J. Glasser, NQS, Las Vegas, NV
D. G. Opielowski, NQS, Las Vegas, NV
Drew Coleman, DOE/YMSCO, Las Vegas, NV
J. R. Dyer, DOE/YMSCO, Las Vegas, NV
D. G. Horton, DOE/YMSCO, Las Vegas, NV
C. E. Hampton, DOE/YMSCO, Las Vegas, NV
J. M. Replogle, DOE/YMSCO, Las Vegas, NV
B. M. Terrell, DOE/YMSCO, Las Vegas, NV

OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
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8 DEFICIENCY REPORT
 CORRECTIVE ACTION REPORT
NO BSC-02-090
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QA: XQA
DEC 31/14/02

DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document: LP-OM-040Q-BSC, Rev. 0, ICN 1
2. Related Report No.: Issue #1037 & 1038

3. Responsible Organization: M&O
4. Discussed With: Rudy Johnson, Ed Fitch

5. Requirement
1. LP-OM-040Q-BSC, paragraph 5.4.2a)2) states, "Responsible Individual: Document quantities of non-quality affecting installed or removed materials used underground that will remain after repository closure on Attachment 3, Non-Quality Affecting Materials Installation Log"
2. LP-OM-040Q-BSC, paragraph 5.4.1c & d states in part, "TFM Designee: Perform data collection for TFM reporting purposes using the data collection processes identified in the following steps to account for TFM use underground and surface. Obtain information to account for TFM usage, emplacement, or loss for the following four major groups. 1) Permanent materials (See Paragraph 5.4.2a))..."
3. LP-OM-040Q-BSC, page 2 Change History for Revision Number 0, Interim Change No. 0 states in part, "....incorporates Expedited Change Notice 001..."

6 Description of Condition
1. Contrary to item 1 above, quantities of non-quality affecting installed materials have been documented in Work Orders #13309 and 12646 on a Materials Use Tracking Record in lieu of Non-Quality Affecting Materials Installation Log.
2. Contrary to item 2 above, the documented non-quality affecting installed materials recorded on the Materials Use Tracking Records in Work Orders #13309 and 12646 have not been collected for TFM reporting purposes by the TFM Designee.
3. Contrary to item 3 above, Expedited Change Notice 001 to NWI-ESF-016Q, which added: document quantities of non-quality affecting installed materials in the work orders and/or the minor task sheet (AP-OM-006Q) to the process for accounting of TFMs was not incorporated in the initial issue of LP-OM-040Q-0BSC, effective 07/09/01.

7. Initiator: Richard L. Noel for Date 03/13/02
9 Does a stop work condition exist? (Not required for a DR)
 Yes No NO For CAR use 10/4/02
If Yes, Check One A B C D

10. Recommended Actions:
Initiate Document Action Request to LP-OM-040Q to Focus on TFM Reports to the TFM Designee when WORK ORDER ACTIVITIES ARE COMPLETE.

11. QA Review: QAR [Signature] Date: 03/27/02
12 Response Due Date: 10 working days from issuance

13. DOQA Issuance Approval: For the CAR - [Signature] Date: 10/04/02
Printed Name: Ram Murthy Signature: [Signature] Date: 4/2/02

22 Corrective Actions Verified: QAR Date
23. Closure Approved by: DOQA Date

D60 10/4/02

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2. Check if Amended

3. Extended Processing

No Yes (If yes, submit Extended Processing request)

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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)

No immediate actions are necessary to bring this process under control because this deficiency is a result of non-compliance with the procedural processes in place.

Date when process will meet requirements: n/a

5. Immediate Remedial Actions Completed:

An investigation was performed for Conditions 1 & 2 and it was determined that type and quantity of materials installed have been identified and the final reporting records (AP-2.17Q) are in place.

6. Plan for Determining the Extent of Condition:

The LP-OM-040Q-BSC/AP-2.23Q and AP-5.1Q/ECN processes and resulting records for Conditions 1, 2, & 3 will be evaluated to determine the extent of condition, the cause, impact to quality, and the necessary remedial action(s). Additionally, the actions to preclude recurrence to be determined.

Supplemental by D60 5/3/02
Does not supersede.
Response dated 5/2/02
D60 5/2/02

7. Due Date for Submittal of Completed Response:

5/1/2002

8. Response by: (Responsible Manager)

C.M. SPARKS
Printed Name

C.M. Sparks
Signature

5/1/02
Date

9. QAR Evaluation: Accept Partially Accept Reject

JOHN R. DOYCE *J.R. Doyle* 4/25/02
Printed Name Signature Date

10. QAM Concurrence:

Ran MURPHY
Printed Name

James Blaylock
Signature

5/10/02
Date

D6 10/4/02

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2. Check if Amended

3. Extended Processing

No Yes (If yes, submit Extended Processing request)

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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)

No change. *From response accepted by CAR 4/25/02 JMD 5/03/02.*

Date when process will meet requirements: n/a

5. Immediate Remedial Actions Completed:

No change, *from response accepted by the CAR on 4/25/02 JMD 5/03/02*

6. Plan for Determining the Extent of Condition:

Initial investigation of the Extent of Condition for conditions 1 & 2 has determined that the scope of the deficiency is more extensive than first anticipated. A list of some 30 additional Work Orders has been developed and needs to be investigated to determine if they fall under this deficiency.

7. Due Date for Submittal of Completed Response:

5/24/2002

8. Response by: (Responsible Manager)

C.M. SPARKS C.M. Sparks 4/29/02
Printed Name Signature Date

9. QAR Evaluation: Accept Partially Accept Reject

JOHN R. DOYLE John Doyle 05/01/02
Printed Name Signature Date

10. QAM Concurrence:

RAM MURPHY James Blaylock 5/10/02
Printed Name Signature Date

D60 10/4/02

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2. Check if Amended

3. Extended Processing

No Yes (If yes, submit Extended Processing request)

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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)

No change from Initial Response accepted by QAR 4/25/2002

Date when process will meet requirements: N/A

5. Immediate Remedial Actions Completed:

No change from Initial Response accepted by QAR 4/25/2002

6. Plan for Determining the Extent of Condition:

The results of the investigation for the Plan for Determining the Extent of Condition identified in the Amended Response dated 4/29/2002 requires amending the plan as follows: Additional investigation will be required to determine the Non-Quality Affecting Material Installation Log (NQAMIL) status for the following Work Orders (WO): WO #13760, WO #13680, WO # 13381, WO #12980, WO # 12454, WO #12248, WO #11919, WO # 11792, WO # 11706, WO #11002, WO #11001, WO #9308, WO #10057, WO #9407, and WO # 9390. The investigation will require a records search in the RISWeb to determine whether NQAMIL can be found for these packages and whether or not the record is complete. This requires comparison against Daily Shift records and the scope of work in the Work Order. Completion of the investigation for the Extent of Condition and determination of impacts will allow a path forward to be formulated which will be required for the Completed Response.

7. Due Date for Submittal of Completed Response:
8/19/2002

8. Response by: (Responsible Manager) BSC RA 07/26/02

CHARLES R GARRETT Charles R Garrett 07/26/02
Printed Name Signature Date

9. QAR Evaluation: Accept Partially Accept Reject

10. QAM Concurrence:

John M Doyle 7/23/02
Printed Name Signature Date

RAM MUZTHY James Blaylock 8/1/02
Printed Name Signature Date

060
10/4/02

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REQUEST FOR EXTENDED PROCESSING

3. Extended Actions: (Identify those corrective actions planned for completion beyond 100 days from issuance of the DR/CAR)

- 1. Completion of the of the Extent of Condition investigation as identified in the Amended Response dated 7/02/2002.
- 2. Completion and submission of the Completed Response.
- 3. Anticipated remedial actions requiring correction or supplementing records.
- 4. Anticipated Actions to Prevent Recurrence:
 - a. Revision of the LP-OM-040Q to link the non-Quality Affecting Material Installation Log to the Work Orders.
 - b. Incorporation of work related records accountability into AP-2.23Q, Work Request/Work Order Process

Expected Completion Date: 12/30/2002

4. Justification: (Provide an explanation as to why the required actions cannot be completed within 100 days)

The scope of this problem is greater than that identified in the conditions cited in this deficiency and a considerable amount of time has been spent searching the RISWeb for NQAMIL records to determine what has been reported and what hasn't. Additional work is required to identify whether the WOs identified above are deficient or not. This process is time consuming because the NQAMIL are not linked to the WOs and a comparison must be made to construction station to determine what NQAMIL goes with what WO. Although this process is tedious, the long Expected Completion Date for closure is related to revision of AP-2.23Q which will provide control of records generated during the execution of the Work Orders.

5. Impact: (Provide an impact statement to indicate what affect not completing within 100 days will have relative to waste isolation and safety, and impact to other work, if any)

There is no impact relative to waste isolation and safety or other work because all items that have been installed are approved TFM and they can be physically identified and accounted for Initial investigation shows that the process was in noncompliance with the requirements from 8/15/00 (the effective date of AP-OM-006), to 1/30/02 (the completion date of the corrective action plan resulting from the 2001 ISMS Annual Review Report). The process has been in compliance with TFM reporting requirements since 1/30/02.

Approvals BSC QA 8/7/02

6. Responsible Manager:	7. Senior Manager:
James Hayes <u>Charles R. Garrett</u> <u>07/02/02</u>	<u>Rick Fay</u> <u>MM</u> <u>7/9/02</u>
Printed Name Signature Date	Printed Name Signature Date

8. DOE Project Management:	9. DOQA:
<u>J.R. Dyer</u> <u>JR Dyer</u> <u>8/9/02</u>	<u>RAM HUNTING</u> <u>RAM</u> <u>8/9/02</u>
Printed Name Signature Date	Printed Name Signature Date

10. Director, OCRWM: (required for scheduled completion dates one year or more from initial issue)

N/A N/A N/A

Printed Name Signature Date

06⁰ 10/4/02

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2. Check if Amended

3. Extended Processing

No Yes (If yes, submit Extended Processing request)

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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)

No change from Initial Response accepted by QAR 4/25/2002.

Date when process will meet requirements: N/A

5. Immediate Remedial Actions Completed:

No change from Initial Response accepted by QAR 4/25/2002.

6. Plan for Determining the Extent of Condition:

No change from Initial Response accepted by QAR 7/23/2002.

7. Due Date for Submittal of Completed Response:

12/30/2002

8. Response by: Responsible Manager QA POC 08/15/02

JL 08/15/02 JAMES WAES 08/15/02
Printed Name Signature Date

9. QAR Evaluation: Accept Partially Accept Reject

JOHN R. DOYLE John R. Doyle 08/06/02
Printed Name Signature Date

10. QAM Concurrence:

RAM MURPHY James Blaylock 9/6/02
Printed Name Signature Date

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DEFICIENCY IDENTIFICATION AND REFERRAL

Date

09/26/02

Open DR/CAR

BSC-02-D-090

Description of Deficiency

LP-OM-040Q-BSC, Rev. 0, ICN1, Subsection 5.4.2a)2) requires the Responsible Individual to document quantities of non-quality affecting installed or removed materials used underground that will remain after repository closure on Attachment 3, Non-Quality Affecting Materials Installation Log.

Contrary to the above requirements, there is evidence that TFM's are being installed without being documented on a Non-Quality Affecting Materials Installation Log. Work Orders 14634, 11370-01, 14573, 13441, 14517, and 14518 are examples of work orders that reference materials that have been installed underground. Examples of materials referenced are: hilti bolts, lifting fixtures, rockbolts, Willex grout (or similar), expansion type anchor, bolts and fasteners.

Also, contrary to the above, the Quality and Non-Quality Affecting Materials Installation Log and the respective Instructions describe the documenting of materials installed, not removed.

See Attached

How Identified

AE Specifications 01501 and 01502 require QC to perform periodic monitoring of QA records identified in the above requirement. (Reference Checklists 01501-03 and 01502-04) No records have been made available for QC to review since January 2002 except for one record dated 04/09/02 for installation of 4 lifting fixtures in the ECRB installed 08/07/01 per Work Order 12646.

During observation of the installation of Hilti-bolts this week, materials were being documented on a Materials Use Tracking Record (attached to WO 14634); however, abandoned bolts were either driven into the rock or bent over with no evidence of record. The Materials Use Tracking Record is not a procedurally required record and not intended to be a TFM tracking record.

Open DR/CAR QAR's Concurrence:

John R. Doyle

Printed Name

William J. Glaser FOR

Signature

10/4/02

Date

Prepared by:

Richard L. Noel

Printed Name

Richard L. Noel

Signature

09/26/02

Date

ATTACHMENT TO DEFICIENCY IDENTIFICATION AND REFERRAL

Based upon the significance of this issue it is recommended that referenced DR ~~LVMO-~~^{BSC} 02-D-090 be elevated to a significant condition adverse to quality and re-issued as a Corrective Action Report (CAR). ^{RPH} 10/4/02

This recommendation is based upon continued failure to adequately control and document the introduction of Tracers, Fluids and Materials (TFMs) into the Exploratory Studies Facility (ESF) and Enhanced Characterization of the Repository Block (ECRB) as well as eight previous deficiencies identified in the area of TFM control and reporting.

The eight previous deficiencies are:

DR K/PB-98-D-105 issued 06/08/98
DR LVMO-98-D-139 issued 08/12/98
DR LVMO-99-D-017 issued 12/29/98
DR LVMO-99-D-058 issued 05/13/99
DR LVMO-00-D-111 issued 07/19/00
DR LVMO-00-D-108 issued 07/31/00
DR LVMO-01-D-031 issued 01/08/01
DR LVMO-02-D-067 issued 01/25/02

In recognition of the severity of this condition the Site Operations Manager has initiated an administrative stop work to preclude further introduction of unrecorded TFMs into the ESF/ECRB. These controls include notification to the Portal Access Controller to stop any TFM from entering the ESF/ECRB and notification to the Construction Manager to cease all operations, which would introduce TFMs into the system. This stop work will remain in effect until positive controls are instituted assuring control.

Should you have any questions and or concerns regarding this matter please do not hesitate to contact the Site Operations Manager, Leon Fossum and or the Site Quality Manager John Martin.

Dated 09/26/02

JSM

