



**Department of Energy**

Washington, DC 20585

QA: QA

OCT 04 2002


J. S. Whitcraft  
Bechtel SAIC Company, LLC  
1180 Town Center Drive, M/S 423  
Las Vegas, NV 89144

**VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT  
(DR) BSC(O)-02-D-167 RESULTING FROM THE OFFICE OF QUALITY ASSURANCE  
(OQA) AUDIT BSC-ARC-02-015**

The OQA staff has evaluated the corrective action of DR BSC(O)-02-D-167 and determined the results to be satisfactory. As a result, the DR is considered closed.

This deficiency does not have an impact relative to waste isolation nor to safety.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Donald J. Harris at (702) 794-1467.



Ram B. Murthy, Acting Director  
Office of Quality Assurance

OQA:JB-1894

Enclosure:  
DR BSC(O)-02-D-167



WMS507  
WM-11

cc w/encl:

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OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

<sup>8</sup>  DEFICIENCY REPORT  
 CORRECTIVE ACTION REPORT  
NO. BSC(O)-02-D-167  
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**DEFICIENCY REPORT/CORRECTIVE ACTION REPORT**

1. Controlling Document: (Document ID and Revision or Date)  
DOE/RW-0333P, Revision 11, Quality Assurance Requirements and Description (QARD)

2. Related Report No :  
BSC-ARC-02-015

3 Responsible Organization:  
Bechtel SAIC Company, LLC (BSC) Design Organization

4 Discussed With  
Larry Trautner, James Whitecraft, Mary McDaniel

5 Requirement  
QARD  
Section 2.2:1, QA Program Documents:  
B. Affected Organizations shall establish implementing documents applicable to their scope of work that translate Quality Assurance Requirements and Description (QARD) requirements into work processes."  
(Continued on page 2)

6 Description of Condition  
Contrary to the cited requirements, AP-3.13Q, Rev. 3, ICN 0, "Design Control":

- 1) Section 5.1.2, Control of Software and Electronic Management of Information, fails to provide the methodology that translates the QARD requirements into a procedural process and refers to BSC Information Technology Operation Policies, which are designated as QA: N/A.
- 2) Section 5.1.7, Implementation, refers to "Configuration Audits" in which there is not a process described for conducting a configuration audit
- 3) Section 5.1.1 d), Design Planning, discusses "Client Design Reviews." The reviews are not described in AP-3.13Q or a procedure referenced in Section 7.0 references

Has work been stopped?  Yes  No

7. Initiator  
Donald J. Harris  
Printed Name Signature Date 8/6/02

9 Does a stop work condition exist?  
 Yes  No  N/A  
If Yes, Check One  A  B  C  D

10. Recommended Actions  
NONE.

11. QA Review  
DONALD J. HARRIS  
Printed Name Signature Date 8/6/02

12. Response Due Date  
10 Working Days after Issuance

13 QAM Issuance Approval  
Printed Name Ram B. Murthy Signature Date 8/21/02

14. Corrective Actions Verified/Closure  
DONALD J. HARRIS  
QAR Printed Name Signature Date 9/25/02

15 QAM Closure Approval  
RAM B. MURPHY  
Printed Name Signature Date

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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

5. Requirement: (Continued)

Section 5.2, Requirements:

Work shall be performed in accordance with controlled implement documents.

Section 5.2.1, Implementing Documents:

The type of document to be used to perform work shall be appropriate to the nature and circumstances of the work being performed. Implementing documents include documents such as procedures, instructions, and drawings, with the exception of drawings governed by Section 3.0, Design Control.

Section 5.2.2, Content of Implementing Documents:

Implementing documents shall include the following information as appropriate to the work to be performed:

- C. A sequential description of the work to be performed including controls for altering the sequence of required inspections, tests, and other operations. The organization responsible for preparing the document shall determine the appropriate level of detail.

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2 Check if Amended   
 Check if also Initial Response

3 Extended Processing  
 No  Yes (if yes, submit  
 Extended Processing request)

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 dr167d doc

**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)

An evaluation was conducted to determine the extent of condition. The extent of condition evaluation concluded that the extent was limited to the condition described in this deficiency and is limited to the procedure AP-3.13Q, Design Control This response is the documentation of the evaluation.

5. Impact (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)

This deficiency does not have an impact relative to waste isolation nor to safety. The impact to other work, relative to item 1) in Description of Condition, only applies to committed changes to the procedure AP-3.13Q regarding control of software and electronic management of information.

There is no impact because of Description of Condition items 2) and 3) in the deficiency since QARD requirements are being met in other sections of the procedure AP-3 13Q.

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

There are no remedial actions required.

7.  Root Cause (For a significant CAQ, attached results of formal root cause determination prepared in accordance with AP-16 4Q)  
 Apparent Cause

The apparent cause is the need for refinement of the procedural controls for implementation of the QARD requirements relative to control of software and electronic management of information.

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

AP-3.13Q, Design Control will be changed to:

- Reference to IT Policies will be deleted The procedure will include the instruction that electronic information will be backed-up regularly. Calculations and other documents will be protected from damage or destruction by being regularly backed-up by CIO and employing standard password protection practices.
- The paragraph referring to "Configuration Audits" will be deleted from the procedure At the current stage of design the process is not necessary and this paragraph does not satisfy QARD requirements.
- The term "Client Design Reviews" are really design status meetings and do not satisfy QARD requirements. "Client Design Reviews" will be removed from the procedure AP-3 13Q.

9. Due Date for Completion of Corrective Action  
 September 30, 2002

11 QAR Evaluation  Accept  Partially Accept  Reject  
 Re-evaluated for significance  
Donald J. HARRIS *Donald J. Harris* 9/5/02  
 Printed Name Signature Date

10. Responsible Manager.  
J. S. Whitcraft *James S. Whitcraft* 9/5/02  
 Printed Name Signature Date

12 QAM Concurrence:  
RAM MURTHI *James Blaylock* 9/6/02  
 Printed Name Signature Date

OFFICE OF  
CIVILIAN RADIOACTIVE WASTE MANAGEMENT  
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## CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

## Verification of Corrective Action for BSC(O)-02-D-167

**Block 4: Immediate Actions**

None, AP-3.13Q, Revision 3, Design Control, was completely revised on June 4, 2002 prior to the Readiness Review of the Engineering Design Process conducted in June 2002 and prior to the OQA audit BSC-ARC-02-15, conducted from July 29 to August 2, 2002 of the BSC Design Organization.

**Block 4: Extent of Condition**

Verified the Extent of Condition was limited to AP-3.13Q, Revision 3, (Refer to Immediate Actions)

**Block 5: Impact**

Verified no impact relative to Waste Isolation or Safety. Additionally, Description of Condition Number 1, was addressed in AP-3.13Q by BSC Policies, Condition Items 2 and 3 of the deficiency were being met in other sections of AP-3.13Q and the terminology used was inappropriate.

**Block 6: Remedial Actions**

Verified none required.

**Block 8: Action to Preclude Recurrence**

Verified AP-3.13Q, Revision 3, ICN 1, Design Control, effective September 25, 2002. Changes included of Procedure Section 5.1.1 Design Planning was to remove the process for client design reviews, Procedure Section 5.1.2 Control of Software and Electronic Management of Information. Removed the policies and provided a methodology, Procedure Section 5.1.7, Implementation. Removed the term configuration audits.

Based on the above verifications, it is recommended the DR BSC(O)-02-D-167 be closed.

QAR: Donald J. Harris  
Donald J. Harris

DATE: 9/25/02