



Department of Energy

Washington, DC 20585

NOV 06 2002

QA: QA

MEMORANDUM FOR: R. Dennis Brown (RW-3)

FROM: James Blaylock *James Blaylock*
Office of Quality Assurance

SUBJECT: Issuance of Deficiency Report (DR) OQA(O)-03-D-012 Resulting
from an Office of Civilian Radioactive Waste Management
(OCRWM) Concern No. 02-254

Enclosed is DR OQA(O)-03-D-012 generated as a result of an OCRWM concern.

Please provide a response to this deficiency that meets the applicable requirements of Administrative Procedure (AP) 16.1Q, *Management of Conditions Adverse to Quality*. Send the original of your response to Deborah G. Opielowski, Navarro Quality Services, P.O. Box 364629, Mail Stop 455, North Las Vegas, Nevada 89036-8629. Initial response to the DR is due ten working days from the date of this letter. Any extensions to this due date must be requested in accordance with AP-16.1Q.

If you have any questions, please contact Bobby C. Scott at (702) 794-5408.

OQA:JB-0173

Enclosure:
DR OQA(O)-03-D-012

cc w/encl:

N. K. Stablein, NRC, Rockville, MD
Robert Latta, NRC, Las Vegas, NV (2 cys)
S. W. Lynch, State of Nevada, Carson City, NV
L. W. Bradshaw, Nye County, Pahrump, NV
W. J. Glasser, NQS, Las Vegas, NV
D. G. Opielowski, NQS, Las Vegas, NV
B. C. Scott, NQS, Las Vegas, NV
J. R. Dyer, DOE/ORD (RW-2W), Las Vegas, NV
B. M. Terrell, DOE/ORD (RW-40W), Las Vegas, NV



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WM 11*

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

8. ☒ DEFICIENCY REPORT
☐ CORRECTIVE ACTION
REPORT
NO OQA(0)-02-D-012
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10/16/02
QA QA

DEFICIENCY REPORT/CORRECTIVE ACTION REPORT

1. Controlling Document: (Document ID and Revision or Date)

QARD, Rev. 12 and AP-18.3Q, Rev. 0

2. Related Report No.:

OCRWM Concern No. 02-054

3. Responsible Organization

OQA

4. Discussed With.

Jack Gallagher discussed with Ram Murthy and Bob Hasson

5 Requirement.

QARD, Rev. 12, Subsection 18.2.1 E states: "Internal audits of work to verify QA program compliance shall be performed annually or at least once during the life of the work, whichever is shorter."

AP-18.3Q, Rev. 0/ICN 0, Attachment 2 states, "Internal audits of work to verify QA program compliance shall be performed annually or at least once during the life of the work, whichever is shorter."

6. Description of Condition:

Contrary to the above, the Acting Director, OQA rescheduled QA program audits OQA-ARC-02-014 and YMSCO-ARC-02-012 beyond the annual requirement.

NQA-1, 1989, "Quality Assurance Program Requirements for Nuclear Facilities", one of the Project committed documents in the QARD, defines the word 'shall' as a requirement. Neither the QARD, Rev. 12 nor AP-18.3Q, Rev. 0/ICN 0 establish parameters for deviations from these requirements or for justifying a deviation from the requirements.

Has work been stopped?

☒ Yes ☒ No

7. Initiator

Nancy Voltura

Printed Name

Signature

Date

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:

Bobby C. Scott

Printed Name

Signature

Date

12. Response Due Date

10 Working Days after Issuance

13 QAM Issuance Approval:

Printed Name R. Dennis Brown

Signature

Date 11/6/02

14. Corrective Actions Verified/Closure

QAR Printed Name

Signature

Date

15. QAM Closure Approval:

Printed Name

Signature

Date