

## Department of Energy

Washington, DC 20585

NOV 06 2002

QA: QA

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

FROM:

SUBJECT:

James Blaylock Jume Buylou Office of Quality Assurance

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 OOA(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

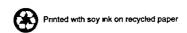
D. G. Opielowski, NOS, Las Vegas, NV

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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ORIGINAL THIS IS A RED STAMP

AP-16 1Q.1

## 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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DEFICIENCY REPORT/CO	· · · · · · · · · · · · · · · · · · ·		
DEFICIENCY REPORT/CORRECTIVE ACTION REPORT			
Controlling Document: (Document ID and Revision or Date)		2. Related Report No.	
QARD, Rev. 12 and AP-18.3Q, Rev. 0		ncern No. 02-054	
3. Responsible Organization 4. D	scussed With.		
OQA Jack 5 Requirement.	Gallagher discussed with Ram Murthy	and Bob Hasson	
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 Facilitites", 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  O Doos a stop work condition exist?			
7. Initiator  Nancy Voltura  Printed Name  Signature  Date	9. Does a stop work condition exist?  Yes No N/A  If Yes, Check One A	в	
10. Recommended Actions:/			
11. QA Review:	12. Response Due Date		
Boby C. Scott Bully State 10/23/02 Printed/Name Signature Date	10 Working Days	after Issuance	
13 QAM Issuance Approval:			
Printed Name R. Dennis Brown Signate		Date 11/6/CZ	
14. Corrective Actions Verified/Closure	15. QAM Closure Approval:		
QAR Printed Name Signature Date	Printed Name Signature	Date Rev. 03/25/2002	