



Department of Energy

Washington, DC 20585

QA: N/A

JAN 10 2003

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

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

SUBJECT: Verification of Corrective Actions and Closure of Deficiency Report
(DR) OQA(O)-03-D-012

The Office of Quality Assurance staff has evaluated the corrective actions of DR OQA(O)-03-D-012 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Bobby C. Scott at (702) 794-5408.

OQA:JB-0503

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

cc w/encl:
N. K. Stablein, NRC, Rockville, MD
Robert Latta, NRC, Las Vegas, NV (2 cys)
N. A. Voltura, DOE/OQA (RW-3), Las Vegas, NV
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
W. J. Arthur, III, DOE/ORD (RW-2W), Las Vegas, NV
B. M. Terrell, DOE/ORD (RW-40W), Las Vegas, NV



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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
PAGE 1 OF 03
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 Murthv 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 ^{DO 10/16/02}

7. Initiator:
Nancy Voltura *Nancy Voltura* 10/16/02
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 *Bobby C. Scott* 10/23/02
Printed Name Signature Date

12. Response Due Date
10 Working Days after Issuance

13. QAM Issuance Approval
Printed Name R. Dennis Brown Signature *James Blyford* Date 11/6/02

14. Corrective Actions Verified/Closure
Bobby Scott *Bobby C. Scott* 12/31/02
QAR Printed Name Signature Date

15. QAM Closure Approval
Dennis Brown *James Blyford* 1/9/03
Printed Name Signature Date

Submittal Page <u>1</u> of <u>1</u> 2. Check if Amended <input type="checkbox"/> Check if also Initial Response <input checked="" type="checkbox"/> 3. Extended Processing <input type="checkbox"/> No <input type="checkbox"/> Yes (if yes, submit Extended Processing request)	OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C.	DR/CAR No.: OQA(O)-03-D-012 Page of QA QA
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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)

All other FY02 OQA audits have been performed as scheduled. The two audits identified in this deficiency report comprise the extent of condition.

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

The audits will be performed per final revision of the FY02 schedule, therefore, there is no impact on safety or any work products.

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

The audits will be performed per the final revision of the FY 02 Audit Schedule.

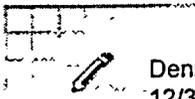
7. Root Cause (For a significant CAQ, attached results of formal root cause determination prepared in accordance with AP-16 4Q)
 Apparent Cause

The Acting OQA Director interpreted the QARD requirement of annual audits to be every calendar year; whereas the OQA audit schedule is performed on a fiscal year basis.

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

E-mail reinforcing the QARD requirement to perform annual audits, describing fiscal year versus calendar year basis, will be issued to OQA personnel.

9. Due Date for Completion of Corrective Action: December 6, 2002	10. Responsible Manager: R Dennis Brown R Dennis Brown 12/3/02 Printed Name Signature Date
11. QAR Evaluation: <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Partially Accept <input type="checkbox"/> Reject <input checked="" type="checkbox"/> Re-evaluated for significance Bobby C. Scott Bobby C. Scott 12/4/02 Printed Name Signature Date	12. QAM Concurrence: R DENNIS BROWN James Blueford 12/10/02 Printed Name Signature Date



Dennis Brown
12/31/2002 10:48 AM

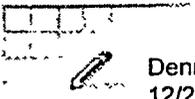
QA:QA DGC

To: Deborah Opielowski/YD/RWDOE@CRWMS
cc:
Subject: DR 03-D-012

User Filed as: Exc/AdminMgmt-14-4/QA N/A DGC
12/31/02

FYI

----- Forwarded by Dennis Brown/HQ/RWDOE on 12/31/2002 10 47 AM -----



Dennis Brown
12/23/2002 04:06 PM

To: OQA
cc:
Subject: DR 03-D-012

User Filed as: Exc/AdminMgmt-14-4/QA N/A DGC
12/31/02

Please be advised that the QARD has requirements for performing an annual audit of activities subject to the QARD. We must remind ourselves that annual means every 12 months, whether in a calendar year or a fiscal year. The appropriate cycle must be maintained in accordance with the procedure

If you have any questions, please see me.

Denny

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No OQA(O)-03-D-012

Page of

QA QA

CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

VERIFICATION OF CORRECTIVE ACTION FOR DEFICIENCY REPORT (DR) OQA(O)-03-D-012

Verified that the Department of Energy (DOE) Director, Office of Quality Assurance (OQA) issued memorandum (e-mail) to OQA personnel on 12/23/02, reinforcing the Quality Assurance Requirements Document (QARD) requirement to perform annual audits (i.e., every 12 months). As a result, this DR is considered closed.


Bobby C. Scott, QAR

12/31/02