



Department of Energy

Washington, DC 20585

QA: N/A

JAN 24 2003

MEMORANDUM FOR: Mark E. Van der Puy, (RW-30W)

FROM: R. Dennis Brown, Director *James Blaylock*
Office of Quality Assurance

SUBJECT: Issuance of Deficiency Report (DR) ORD(O)-03-D-048
Regarding the Use of Technical Direction Letters

Enclosed is DR ORD(O)-03-D-048, generated as a result of an Office of Civilian Radioactive Waste Management audit OCRWM-ARC-02-12.

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 responses 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 either James Blaylock at (702) 794-1420 or Robert A. Toro at (702) 794-1498.

OQA:RDB-0585

Enclosure:
DR OQA(O)-03-D-048

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
R. A. Toro, 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. ORD(O)-03-D-048

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QA: QA

DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document:
Quality Assurance Requirements and Description (QARD)
DOE/RW-0333P, Revision 12

2. Related Report No.:
OCRWM-ARC-02-12

3. Responsible Organization:
Office of Repository Development (ORD), Office of
Project Support (OPS)

4. Discussed With:
Catherine Hampton, Birdie Hamilton-Ray, Reggie James, &
James Blaylock

5. Requirement:

QARD, Section 5.2.2 requires implementing documents be established that include methods for demonstrating that the work is performed as required.

6. Description of Condition:

Contrary to the above, Contract No. DE-AC28-01RW12101 to Bechtel SAIC Company LLC allows technical direction, implemented as a Technical Direction Letter (TDL), to redirect contract effort and to interpret technical portions of the work. However, Administrative Procedure LP-4.1Q does not recognize the use of Technical Direction Letters and, therefore, does not demonstrate the method for redirecting technical work, nor does it require the same level of control (i.e. review) as the procurement document that outlined the original scope of work.

7. Initiator:

Robert A. Toro

Date 12/05/02

9. Does a stop work condition exist? (Not required for a DR)

Yes No

If Yes, Check One: A B C D

10. Recommended Actions:

None

11. QA Review:

QAR Robert A. Toro

Date 12/17/02

12. Response Due Date:

10 Working Days From Issuance

13. DOQA Issuance Approval:

Printed Name R. Dennis Brown

Signature

James Blaylock for

Date

1/27/03

22. Corrective Actions Verified:

QAR

Date

23. Closure Approved by:

DOE/OQA

Date