



Department of Energy
Washington, DC 20585

QA: N/A

MAR 26 2003

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

FROM: James Blaylock, Verification Lead *James Blaylock*
Office of Quality Assurance

SUBJECT: Issuance of Deficiency Report (DR) ORD(O)-03-D-106 Regarding
Improper Supersession of Administrative Procedure (AP) 5.1Q

Enclosed is DR ORD(O)-03-D-106 generated as a result of an observation.

Please provide a response to this deficiency that meets the applicable requirements of 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 extension to the due date must be requested in accordance with AP-16.1Q.

If you have any questions, please contact James Blaylock at (702) 794-1420.

OQA:JB-0938

Enclosure:
DR ORD(O)-03-D-106

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
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W. J. Arthur, III, DOE/ORD (RW-2W), Las Vegas, NV
W. J. Boyle, DOE/ORD (RW-40W), Las Vegas, NV
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RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

8. DEFICIENCY REPORT
 CORRECTIVE ACTION
REPORT
NO ORD(0)-03-D-106
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QA: QA

DEFICIENCY REPORT/CORRECTIVE ACTION REPORT

1. Controlling Document: (Document ID and Revision or Date)
MP-5.1Q, Rev. 00, ICN 00

2. Related Report No.:
NA

3. Responsible Organization:
ORD Project Support

4. Discussed With:
Denny Brown

5. Requirement:

QARD Section 5.2.4 -Individuals shall comply with implementing documents, however:

A. When work cannot be accomplished as described in the implementing document, or accomplishment of such work would result in an undesirable situation, the work shall be stopped.

B. Work shall not resume until the implementing document is changed (in accordance with Section 6.0, Document Control) to reflect the correct work practices

2.2.12.A.4.-Ensure indoctrination and training are completed prior to performing the work.

6.2.5.C - The disposition of obsolete or superseded documents shall be controlled to ensure that they are not used to perform work.

6. Description of Condition:

MP-5.1Q, Processing of Procedures became effective 2/14/03. The Change History states that the MP supersedes AP-5.1Q, Plan and Procedure Preparation, Review and Approval. MP-5.1Q, Section 2.0, Applicability, states that AP-5.1Q will continue to be used for the processing of changes to Administrative Procedures (APs) and Line Procedures (LPs) until such time as it is cancelled. Once AP-5.1Q is cancelled, MP-5.1Q will be used to process changes to existing APs and LPs if such changes are needed.

As a result, MP-5.1Q is inconsistent with the QARD requirements based on the following:

1. The Applicability statement is contrary to QARD Sect. 5.2.4 because it allows project activities to be performed to a superseded procedure (i.e., AP-5.1Q is replaced by MP-5.1Q) which is inconsistent with the AP-5.1Q definition of superseded and inconsistent with DOE policy and past practices.

2. QARD Sect. 2.2.12.A.4 has not been met in that development of the training module for MP-5.1Q is still in progress and staff have not been trained for new procedure development or procedure changes that are in progress as of 2/14.

3. QARD Sect. 6.2.5.C states that the disposition of superseded documents shall be controlled to ensure that they are not used to perform work; however MP-5.1Q states that work can be performed to a superseded procedure.

Has work been stopped? Yes No

7. Initiator:

Mark VanDerPuy
Printed Name

Signature

Date

3/13/03

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:

JAMES BLAYLOCK
Printed Name

Signature

Date

James Blaylock

3/21/03

12. Response Due Date:

10 Working Days after Issuance

13. QAM Issuance Approval:

Printed Name R. Dennis Brown

Signature

Date 3/26/03

James Blaylock for

14. Corrective Actions Verified/Closure

QAR Printed Name

Signature

Date

15. QAM Closure Approval:

Printed Name

Signature

Date