



## Department of Energy

Washington, DC 20585

QA: QA

APR 11 2003

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

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

SUBJECT: Issuance of Deficiency Report (DR) ORD(O)-03-D-108 for  
Inadequate Planning for Procedure Transition

As a result of Office of Civilian Radioactive Waste Management Surveillance OQA-SI-03-014, a condition adverse to quality has been identified and documented in the enclosure.

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 Kerry M. Grooms at (702) 794-1367.

OQA:KMG-0936

Enclosure:  
DR ORD(O)-03-D-108

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  
M. J. Mason, BSC, Las Vegas, NV  
M. M. Maxfield, BSC, Las Vegas, NV  
D. J. Harris, NQS, Las Vegas, NV  
W. J. Glasser, NQS, Las Vegas, NV  
D. G. Opielowski, 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



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

ORIGINAL  
A RED STAMP

8 ☒ Deficiency Report  
☐ Corrective Action Report

No ORD(O)-03-D-108

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QA QA

DEFICIENCY REPORT/CORRECTIVE ACTION REPORT

1 Controlling Document (Document ID and Revision or Date)  
DOE/RW-0333P, Rev. 12, "Quality Assurance Requirements and Description"

2. Related Report No.  
OQA-SI-03-014

3 Responsible Organization.  
Office of Repository Development (ORD)

4 Discussed With.  
Melinda D'Ouille, Dennis Brown, Elaine Mew, James King,  
Mark Van der Puy

5 Requirement  
QARD 2.2.5, Planning Work, "Planning shall be documented to ensure work is accomplished under suitably controlled conditions.

6 Description of Condition  
A planning document; i.e., a transition plan, was not prepared by DOE that was adequate to control the transition of procedures without interrupting ongoing work. The following examples of objective evidence were found to support this adverse condition:

- Ninety-seven procedures were superseded with "BSC only" procedures, which left DOE without several implementing procedures. Examples of procedures used by DOE which were cancelled:
  - AP-2.1Q, *Indoctrination and Training of Personnel* (BSC-AP-HR-0001)
  - AP-2.2Q, *Establishment and Verification of Required Education and Experience of Personnel* (BSC-AP-HR-0002)
  - AP-2.6Q, *Readiness Review* (BSC-AP-PM-0003)
  - AP-2.19Q, *Quality Assurance Requirements and Description Requirements Matrix and Impact Evaluation* (BSC-AP-PM-0001)
  - AP-7.4Q, *Supplier Evaluation and Qualified Supplier List (QSL) Maintenance* (BSC-AP-QA-0005)
  - AP-17.1Q, *Record Source Responsibilities for Inclusionary Records* (BSC-AP-RMD-0001)
  - AP-SV.1Q, *Control of the Electronic Management of Information* (BSC-AP-CIO-0014)
- A new procedure numbering system was initiated without regard to the number of other procedures impacted due to the procedure references they contain and the effort involved in updating them. Examples of the number of procedures that will need to be updated due to renumbering:
  - AP-2.1Q, referenced in 40 documents
  - AP-7.4Q, referenced in 7 documents
  - AP-17.1Q, referenced in 550 documents
  - AP-SV.1Q, referenced in 132 documents

Has work been stopped? ☐ Yes ☒ No

7 Initiator  
Lester W. Wagner  4/8/03  
Printed Name Signature Date

9 Does a stop work condition exist?

☐ Yes ☒ No ☐ N/A

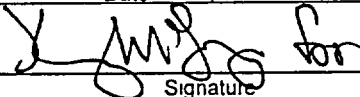
If Yes, Check One ☐ A ☐ B ☐ C ☐ D

10 Recommended Actions  
None

11 QAR Review  
Donald J. Harris  4/9/03  
Printed Name Signature Date

12 Response Due Date

10 Working days after issuance

13 QAM Issuance Approval  
R Dennis Brown  4/10/03  
Printed Name Signature Date

14 Corrective Actions Verified/Closure

15 QAM Closure Approval

QAR Printed Name Signature Date

Printed Name Signature Date