



Department of Energy  
Yucca Mountain Site Characterization  
Project Office  
P. O. Box 98608  
Las Vegas, NV 89193-8608

WBS 1.2.9.3  
QA

JAN 13 1991

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Technical Project Officer  
for Yucca Mountain  
Site Characterization Project  
Science Applications International Corporation  
The Valley Bank Center, Suite 407  
101 Convention Center Drive  
Las Vegas, NV 89109

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-91-015  
RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD)  
AUDIT 90-08 OF TECHNICAL AND MANAGEMENT SUPPORT SERVICES

The YMQAD staff has evaluated the response to CAR YM-91-015. The response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided.

An extension to the effective date must be requested in writing, with appropriate justification, prior to that date.

If you have any questions, please contact either Catherine E. Hampton at 794-7973 or Kerby L. Tyger at 794-7250.

*Donald G. Horton for*  
Donald G. Horton, Director  
Yucca Mountain Quality Assurance Division

YMQAD:CEH-1694

Enclosure:  
CAR YM-91-015

cc w/encl:  
K. R. Hooks, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08  
W. V. Macnabb, SAIC, Las Vegas, NV, 517/T-04  
K. W. Moore, SAIC, Las Vegas, NV, 517/T-28

cc w/o encl:  
J. W. Gilray, NRC, Las Vegas, NV

YMP-5

9101230292 910116  
PDR WASTE  
WM-11 PDR

236138

FULL TEXT ASCII SCAN

102.7  
WM-11  
NH03

**YMPO STANDARD DEFICIENCY REPORT  
CONTINUATION SHEET**

N-QA-038  
2/89

SDR No. 572

Page 2 of 2

8 Requirement ( continued )

will be specified in accordance with Section 17.0. Contractors for QA Level I or II procurement shall be required to have a documented QA Program that is consistent with all, or appropriate portions of, the requirements of the YMP QA Plan." Para. 17.1.2 states in part, "QA Records include (1) individual documents that have been executed, completed, and approved and that furnish evidence of the quality and completeness of activities affecting quality; (2) documents prepared and maintained to demonstrate implementation of quality assurance programs. A completed record is a document that will either receive no more entries or whose revision would normally consist of reissue of the document; and is signed and dated by the originator, and, as applicable, by personnel authorized to approve the document."

DOP 7-1, Revision C, Para. 6.3.3.6 states, "Procurement documents will specify supplier responsibilities for QA records identification, maintenance, safeguarding, and turnover to this organization (SNL)."

9 Deficiency ( continued )

adequate implementation of the appropriate portions of Section 17 of SNL QAPP.

SNL has only determined requirements for the submittal of records. However, these requirements are different than for those classified as QA records in the QAPP.

NOTE:

In accordance with an SNL list of contracts important to safety or waste isolation, dated 8/23/90, thirty contracts dealing with quality have already been awarded to date.

10 Recommended Actions ( continued )

to determine the extent and depth of similar deficient conditions to those listed on the SDR. Identify these deficiencies and provide the measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

Block 14 Remedial Actions (Continued):

the contractor's records would, by definition, become a QA records only after the SNL Contract Monitor reviews, approves, and authenticates the records as a QA records. In addition, it is specifically stated that the contractor adhere to the YMP QA Plan which includes the requirements of Section 17. To alleviate the definition dilemma, SNL will complete the actions in Block 16.

Amended Response to SDR 572

14. REMEDIAL/INVESTIGATIVE ACTIONS:

15. EFFECTIVE DATE: Complete

Remedial Action:

No remedial action needed or required at this time.

Investigative Action:

Clarification of the misunderstanding as to when a Quality Assurance (QA) record is a QA record is found in paragraph 17.1 of Revision 4 to the YMP Quality Assurance Requirements Document, which states that:

"Documents that are to become QA Records are considered QA Records upon completion and authentication by all required signatures. A complete QA record is a document that will receive no more entries and whose revision would be subject to a change control process. Prior to this final authentication, interim protection shall be afforded."

SNL contractor documents that are to become QA records are considered QA records when the record is completed and signed by the contractor, as required, and authenticated by the SNL contract monitor. (SNL contract monitors must authenticate all contractor records that are to be filed).

When the SNL contract monitor receives a completed, approved, and signed contractor document and feels changes are required, the completed, approved, and signed contractor document is sent back to the contractor to be reaccomplished. Thus a record is only a QA record when the SNL contract monitor authenticates it as a QA record. A contractor record would be rewritten, if changes were required, up to the time the contract monitor authenticates the record. There are no more entries after that authentication unless the entry is accomplished through the records correction process.

We require contractors to safeguard all records and documents in accordance with Section 17 of the QARD or Section 17 of the SNL QAPP depending on which QA program the contractor is following and to submit those records or documents to the contract monitor within 30 days. This process ensures all records or documents have been and will continue to be treated appropriately and protected when needed.

(15 & 16 Continued on the next page)

*Ltr dtd 12/21/90  
Bleywas to Horton*

Amended Response to SDR 572

16. CAUSE OF THE CONDITION & CORRECTIVE ACTION TO PREVENT RECURRENCE:

17. EFFECTIVE DATE: Complete

Cause of the Condition:

There was a misunderstanding as to when a record becomes a QA record. A record is a QA record when, by definition, the contract monitor authenticates the record satisfying the QA record requirement.

Corrective Action to Prevent Recurrence:

From now on, SNL will implement measures that ensure contractor records and documents are identified with submittal dates or frequencies and that all contracts specifically address the contractors' responsibilities for the maintenance, safeguarding, and turnover of those records to the SNL Contract Monitor. These controls are currently stated in the appendices of SNL Quality Assurance Implementing Procedure 4-1.

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

14CAR NO.: YM-91-015  
DATE: 11/27/90  
SHEET: 1 OF 1  
QA  
WBS No.: \_\_\_\_\_

**CORRECTIVE ACTION REQUEST**

1 Controlling Document SP 1.25, Revisions 1 and 2	2 Related Report No. Audit 90-08
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3 Responsible Organization SAIC	4 Discussed With J. Harper
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10 Response Due 12/27/90	11 Responsibility for Corrective Action J. Harper	12 Stop Work Order Y or N N
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5 Requirement:

SP 1.25, Revisions 1 and 2, Paragraph 5.5.2 states, "Complete the "Hold for Test" tag, Ref. Exhibit 7, and attach to item. Annotate the RIR remarks section to indicate "Hold for Test" tag attached."

6 Adverse Condition:

A review of Procurement Packages (i.e., #14-910056 and #14-910074) revealed that "Hold for Test" tags have not been utilized for items that have been received, inspected, and require testing. (Note: The inspector concurred that the tags had not been used.)

7 Recommended Action(s):

1. Identify those items that have been accepted and require "Hold for Test" tags. Apply the tags and annotate the RIR.
2. Re-emphasize the requirement to the inspectors.

8 Initiator K. L. Tyger <i>K. L. Tyger</i>	Date: <u>11/19/90</u>	9 Severity Level - 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input checked="" type="checkbox"/>	13 Approved By: OQA <i>James Blaylock</i>	Date: <u>11/21/90</u>
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15 Verification of Corrective Action:

16 Corrective Action Completed and Accepted:  QAR _____ Date _____	17 Closure Approved By:  OQA _____
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OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

CAR NO. YM-91-015  
DATE: 12/27/90  
SHEET: 1 OF 1

**CORRECTIVE ACTION REQUEST**  
(continuation sheet)

CORRECTIVE ACTION FOR DEFICIENT CONDITION

A. EXTENT OF DEFICIENCY: N/A

B. ROOT CAUSE: N/A

C. REMEDIAL ACTION:

All open procurement packages have been reviewed for cited deficiency. "Hold For Test" tags were prepared and affixed to the items listed below, and the RIRs appropriately annotated. The procedural process precludes closing packages until testing is complete.

ICN #1 to SP 1.25, Rev. 2, was issued on 11/19/90 to clarify when "Hold For Test" tags are required. All inspectors have read and understand the ICN.

PURCHASE ORDER

ITEM NO.

14-910056	S/N D86
14-910074	S/N-731020-D1
14-910074	S/N-731020-D2
14-910074	S/N-721020-D3
14-910074	S/N-721020-D4
14-910074	S/N-721020-D5
14-910085	S/N-401729

D. CORRECTIVE ACTION TO PREVENT RECURRENCE: N/A

RESPONSE APPROVED:

Went B. Johnson for JB Harper  
Responsible Manager

12/27/90  
Date

RESPONSE ACCEPTED

Kirby L. Tye  
QAR

1/10/91  
Date

RESPONSE ACCEPTED

William Harper  
OQA

1/10/91  
Date