



Department of Energy
 Yucca Mountain Site Characterization
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WBS 1.2.9.3
 QA

JAN 29 1991

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 Site Characterization Project
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EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-91-012 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT 90-08

The YMQAD staff has evaluated the response to CAR YM-91-0-12. The response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this 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 Terry W. Noland at 794-7212.

Donald G. Horton, Director
 Yucca Mountain Quality Assurance Division

YMQAD:CEH-1874

Enclosure:
 CAR YM-91-012

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

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

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OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C.	14CAR NO.: <u>YM-91-012</u> DATE: <u>11/27/90</u> SHEET: <u>1</u> OF <u>2</u> <div style="text-align: center;">QA</div> WBS No.: <u>N/A</u>
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CORRECTIVE ACTION REQUEST

1 Controlling Document QAPD	2 Related Report No. Audit 90-08
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3 Responsible Organization SAIC	4 Discussed With D. Sorensen
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10 Response Due 12/27/90	11 Responsibility for Corrective Action D. Sorensen	12 Stop Work Order Y or N N
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5 Requirement:

QAPD, Revision 1, Paragraph 2.2.11 states in part, "T&MSS personnel assigned to perform activities that affect quality shall receive appropriate training prior to performing work."

SP 1.31, Revision 2, Paragraph 5.2.2 states in part, "Responsible manager assigns training (per T&MSS 027/4) the individual is expected to accomplish when it has been determined they will be performing quality affecting work. This will be done prior to execution of the initial qualification evaluation."

Paragraph 5.3, Training on New and Revised Procedures. Paragraph 5.3.1 and 5.3.2 states in part, "As new procedures are issued, determine which staff members, if any, should be trained on the procedure. As revised procedures are issued, determine which staff members, if any, must be trained on the revisions: Training shall be assigned if the procedure that has been

6 Adverse Condition:

Personnel in the Radiological Field Program Department are performing quality affecting activities without receiving some of the required training as determined by the initial training form or as determined by additional training requested by the responsible manager on September 11, 1990. Furthermore, the training program at this time does not require to document the revision and/or changes affecting the documents used for training. Therefore, it is very difficult in some cases to verify or attest to this information.

7 Recommended Action(s):

8 Initiator M. R. Diaz <i>Mario Diaz</i>	Date: <i>11/16/90</i>	9 Severity Level - <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3	13 Approved By: OQA <i>James Blaylock</i>	Date: <i>11/21/90</i>
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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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**CORRECTIVE ACTION REQUEST
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5 Requirements (continued)

revised was previously identified as part of the employee's required training. In such a case, the training must be completed prior to the performance of quality affecting work using the procedure, or within 30 calendar days, whichever is sooner."

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DISCUSSION OF ADVERSE CONDITION:

The TMSS QA Classifications (TMSS/035/1) for several RFPD personnel were reviewed by the auditors to determine currentness of qualification status. The forms that were required to be with this classification were not updated at the same time this form was updated. These required forms, per SP 1.31, are:

- o Job Position Description
- o Quality Affecting Activities Form (TMSS/039/1)
- o Updated Training Records (TMSS/027/4)

The existing training records for performing quality effecting work (TMSS 027/4) were then reviewed and compared to the updated QA classification form. It was determined that several training requirements had been added to the "Quality Training" list after the previous Qualification Evaluation Form (TMSS/025/1) had been completed showing personnel as qualified to perform quality effecting tasks. This, in effect, invalidated the qualification of RFPD personnel.

There was also no simple means of determining which procedures personnel had been trained to as there were no revision numbers listed on the training forms.

The wrong form was used to indicate the need for continuation training. This training is required whenever new or revised procedures, which have an impact on quality effecting work, are issued. Because the wrong form was used it appeared that the personnel were not sufficiently trained when the initial qualification was made. In reality, all personnel were trained sufficiently to perform the quality effecting work being conducted at the time of qualification.

There was not a distinction made on the assignment forms between the training for procedure review that was required for quality effecting work verses training needed to establish general familiarization with a topic or training required which did not effect quality activities.

WI-RM-105, which addressed training requirements for RFPD, was in conflict or duplicated the requirements of SP 1.31. This WI caused confusion in the determination of the proper training required to both assure currentness on quality effecting training and that training necessary to maintain job skills. For example, as a result of the requirements in WI-RM-105 it had been determined that a basic Health Physics refresher course was required in order to perform quality effecting work. The proper designation of this training should have been that this was supplemental training and not required to perform quality effecting work.

There is no requirement in any of the procedures requiring that revision numbers be listed on the training forms.

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Response to CAR YM-91-012 (cont)

A. EXTENT OF DEFICIENCY: N/A

B. ROOT CAUSE: N/A

C. REMEDIAL ACTION:

The following corrective actions were determined necessary by the RFPD Manager after a review of the RFPD training Records was completed.

An updated baseline training qualification has been established for all RFPD personnel who are currently performing quality effecting activities. This baseline includes:

- o QA Classification (TMSS/035/1)
- o Quality Affecting Activities (TMSS/039/1)
- o Qualification Evaluation Form (TMSS/025/1)
- o Qualification Training for T&MSS Personnel (TMSS/027/4)
- o A validation of existing Job Position Descriptions

All personnel have been re-qualified as of November 19, 1990 to current procedures. Any new or revised procedures which will affect those RFPD personnel performing quality affecting work will be documented in accordance with SP 1.31 on form TMSS/027/4 "Qualification Training for T&MSS Personnel".

This baseline allows all personnel to engage in the quality affecting activities under their current job assignments.

WI-RM-105 has been deleted. All other procedures which listed this procedure have been revised.

All revision numbers have been added to the current listing of training requirements.

All training that is not required for quality affecting work will be tracked in a system separate from the quality affecting training. This training will be tracked on TMSS/026/2 "Supplemental Training for T&MSS Personnel" in accordance with Revision 2 of SP 1.31, effective 11/30/90.

A review of current job assignments and responsibilities was made for each RFPD employee currently performing quality effecting work. It was established that all personnel are currently in compliance with training assignments for those areas in which they are working.

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Response to CAR YM-91-012 (cont)

D. CORRECTIVE ACTIONS TO PREVENT RECURRENCE: N/A

Supervisory personnel have been instructed to follow training requirements in accordance with approved procedures. No other actions are necessary.

RESPONSE APPROVED: DK Chandler 12/27/90
Responsible Manager Date

Response Accepted: T.W. Noll 1/7/91
QAR Date

Response Accepted: Catherine Hampton 1/10/91
OQA Date