



Department of Energy

Yucca Mountain Project Office

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Las Vegas, NV 89193-8608

WBS 1.2.9.3

QA

AUG 07 1990

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Technical Project Officer
for Yucca Mountain Project
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ACCEPTANCE OF RESPONSES TO OBSERVATIONS RESULTING FROM YUCCA MOUNTAIN PROJECT
OFFICE (PROJECT OFFICE) QUALITY ASSURANCE (QA) AUDIT 90-01 OF LOS ALAMOS
NATIONAL LABORATORY (LOS ALAMOS)

The Project Office QA staff has evaluated the responses to Observations
90-01-01 through 14, generated as a result of Project Office QA Audit 90-01 of
Los Alamos. The responses to these observations are acceptable. Copies of the
observations are enclosed for your information.

If you have any questions, please contact either Catherine E. Hampton at
(702) 794-7973 or FTS 544-7973, or Stephen R. Dana at (702) 794-7176 or
FTS 544-7176 of the Yucca Mountain Project QA staff.

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

QA:CEH-4416

Enclosures:
Observations 90-01-01 thru 14

cc w/encls:
D. E. Shelor, HQ (RW-30) FORS
S. W. Zimmerman, NWPO, Carson City, NV
K. R. Hooks, NRC, Washington, DC
H. P. Nunes, LANL, Los Alamos, NM

cc w/o encls:
H. E. Valencia, LAAO
J. W. Hines, OGD, AL
A. R. Chernoff, MSD, AL
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08
S. R. Dana, SAIC, Las Vegas, NV, 517/T-06
S. R. Dippners, SAIC, Las Vegas, NV, 517/T-08
J. W. Gilray, NRC, Las Vegas, NV

YMP-5

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FDR WASTE
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FULL TEXT ASCII SCAN

102.7
WM-11
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YUCCA MOUNTAIN PROJECT OFFICE
YMPO OBSERVATION NO. 90-01-01N-QA-012
4/89

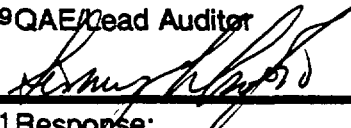
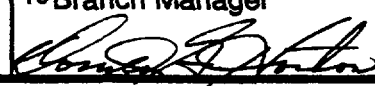
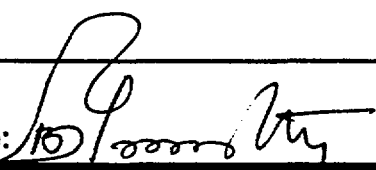
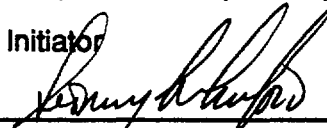

Completed by Originating Organization	2 Noted During: Audit 90-1	3 Identified By: M. Diaz	4 Date: 3-28-90
	5 Organization: Los Alamos	6 Person(s) Contacted: H. Nunes	7 Response Due Date is 20 Days from Date of Transmittal
	8 Discussion: <p>The new QA organization has recognized the need to revise several procedures to reflect new Los Alamos organizational changes. However, a plan is needed to determine:</p> <ul style="list-style-type: none">a) How many of these procedures should be revised; andb) The period of time or schedule by which this task should be finished.		
Completed by Respondee	9 QAE/Lead Auditor <i>S. Davis</i>	Date 5/8/90	10 Branch Manager <i>Catherine Hampton</i>
	11 Response: <p>The LANL QA Organization currently holds bi-weekly QA meetings. These meetings have two parts: one is an open session to discuss open QA issues and other project issues of interest, and the second is a working session for the QA Liasons and other QA staff. Attendance is kept, an agenda issued, and an action item list is maintained. These meetings identify needed revisions or new procedures and formally establish responsibilities for their creation or revision and set due dates. These actions identify the procedures to be revised (a, in the observation) and sets a schedule for the task (b, in the observation).</p>		
Completed by QA Org.	12 Signature: <i>H. Nunes</i>		Date: 7/12/90
	13 Response Receipt Acceptable <input checked="" type="checkbox"/>		
	Initiator <i>Rainis Lina</i>	Date 7/27/90	QA/Lead Auditor <i>S. Davis</i>
14 Remarks:			
<div style="text-align: right;">Page 1 of 1</div>			

8 Discussion: (continued)

suggested chairman is the author of the subject study plan and does not appear to have sufficient independence of the activity to be reviewed.

YUCCA MOUNTAIN PROJECT OFFICE
YMPO OBSERVATION NO. 90-1-02

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: S. L. Crawford		4 Date: 3-30-90	
	5 Organization: YMPO		6 Person(s) Contacted: D. Broxton		7 Response Due Date is 20 Days from Date of Transmittal	
	<p>8 Discussion:</p> <p>YMPO (M. Blanchard) requested on 10/25/89 that a Readiness Review of SP 8.3.1.3.2.1 be conducted per AP-5.13Q. Los Alamos responded 11/21/89 suggesting a Los Alamos person as the Readiness Review board chairman. The Readiness Review has not been performed to-date pending resolution and verification of Audit 89-7 Observations 89-7-01 and 89-7-02, and revision of Los Alamos procedure QP-02.4. Based on the correspondence, it is not clear who is responsible for the Readiness Review (YMPO or Los Alamos) or which procedure governs (AP-5.13Q or QP-02.4). In addition, the Los Alamos</p>					
Completed by Respondee	9 QAE/Lead Auditor 		Date 4/11/90		10 Branch Manager 	
					Date 4/14/90	
Completed by QA Org.	<p>11 Response:</p> <p>The subject readiness review scheduled by the Regulatory and Site Evaluation Division has been tentatively postponed because of the required input from the plans and procedures effort and the comments from the U.S. Nuclear Regulatory Commission on the study plan. It will be rescheduled in future after obtaining the appropriate input.</p> <p>The Readiness Review Board Chairman is from the Project Office and is independent. Los Alamos suggested Chairman is for the Readiness Review Team, not for the Board.</p>					
	<p>12 Signature: </p> <p>Date: 6/12/90</p>					
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>					
	Initiator 	Date 6/15/90	QA/Lead Auditor 	Date 6/20/90		
Completed by QA Org.	14 Remarks:					

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ENCLOSURE

YUCCA MOUNTAIN PROJECT OFFICE

YMPO OBSERVATION NO. 90-1-03

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: S. L. Crawford		4 Date: 3/30/90	
	5 Organization: Los Alamos		6 Person(s) Contacted: D. Broxton		7 Response Due Date is 20 Days from Date of Transmittal	
	<p>8 Discussion:</p> <p>Los Alamos Detailed Technical Procedures (DPs) and Quality Assurance Procedures (QPs) referenced or identified in Study Plan 8.3.1.3.2.1, Rev. 0, 6/89 are incorrect or have not been prepared. The Study Plan has been issued by YMPO as a controlled document. Los Alamos should issue a Study Plan Change Request to YMPO per the requirements of AP-1.10Q, Rev. 1, Paragraph 5.7.</p> <p>Examples to follow:</p>					
Completed by Respondee	9 QAE/Lead Auditor <i>[Signature]</i>		Date 4/11/90		10 Branch Manager <i>[Signature]</i>	
					Date 4/16/90	
Completed by QA Org.	11 Response:					
	<p>An interim change notice will be prepared by D. Broxton and issued to Study Plan 8.3.1.3.2.1, Rev. 0, in accordance with YMPO administrative procedure, AP-1.10Q, Rev. 1, paragraph 5.7 by July 15, 1990, clarifying the quality administrative and technical procedures referenced in the plan. The study plan is a Headquarters' document. Headquarters should provide guidance for controls of procedure listings included in study plans for information. Information lists should be dated and refer the reader to the original source document.</p>					
Completed by QA Org.	12 Signature: <i>[Signature]</i> Date: 7/12/90					
	13 Response Receipt Acceptable <input checked="" type="checkbox"/>					
	Initiator <i>[Signature]</i> S. L. Crawford		Date 7/25/90		QA/Lead Auditor <i>[Signature]</i>	
					Date 7/30/90	
14 Remarks:						
<div style="text-align: right;"> <p>Page 1 of 2</p> </div>						

8 Discussion: (continued)

SP PARA.#	PROCEDURE #	EXAMPLE
2.5.6	TWS-MSTQA-QP-18	Obsolete procedure
3.1.1	TWS-ESS-DP-28	Rescinded 2/7/89 (P 3.3.1, 3.4.1 also)
3.1.4	TWS-QAS-QP-3.11	Not prepared (P 3.3.4 also)
	QP-3.12	Not prepared " "
	QP-3.13	Not prepared " "
3.3.1	TWS-ESS-DP-117	Rescinded 6/29/89 (P 3.4.1 also)
Table A-1		Numerous unissued and superseded QPs are listed.

8 Discussion: (continued)

Examples: QP-3.6 - superseded by QP-3.15, QP-3.16
QP-3.8 - superseded by QP-3.15, QP-3.16
QP-3.11 - not issued
QP-3.12 - not issued
QP-3.13 - not issued
QP-17.1 - superseded by QP-17.3
QP-17.2 - superseded by QP-17.3

Additional Los Alamos QPs were issued or superseded 3/2/90 subsequent to the QA review of the Study Plan.

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-1-04

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: S. L. Crawford		4 Date: 3-30-90	
	5 Organization: Los Alamos		6 Person(s) Contacted: D. Hobart, K. West		7 Response Due Date is 20 Days from Date of Transmittal	
	8 Discussion: A QA Review of Study Plan SP-8.3.1.3.5.1/3.5.2 was conducted 1/2/90 following the issue of AP-1.10Q, Rev. 1 (signed 12/21/89, effective 1/22/90). The QA review identified conflicting QA program criteria between Table A-1 and Table A-2, but did not identify numerous unissued and superseded Quality Procedures in Table A-1. The study plan was still in internal Los Alamos review and had not been submitted to YMPO. See examples to follow.					
Completed by Respondee	9 QA/Lead Auditor <i>[Signature]</i>		Date 4/11/90		10 Branch Manager <i>[Signature]</i>	
					Date 4/16/90	
Completed by Respondee	11 Response: Table A-1 will be corrected to reflect the current approved quality administrative procedures prior to its submittal.					
	12 Signature: <i>[Signature]</i> Date: 7/12/90					
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>					
	Initiator <i>[Signature]</i> Date 7/25/90		QA/Lead Auditor <i>[Signature]</i> Date 7/30/90			
14 Remarks:						
						Page 1 of 2

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-01-05

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: S. L. Crawford		4 Date: 3-30-90	
	5 Organization: Los Alamos		6 Person(s) Contacted: D. Broxton, D. Hobart, Vaniman		7 Response Due Date is 20 Days from Date of Transmittal	
	8 Discussion: Los Alamos Detailed Technical Procedures (DPs) referenced obsolete Quality Assurance procedures. Although action to cross reference obsolete and superseded QPs to the equivalent current procedures on procedure tables of contents is being taken, Los Alamos should establish measures to review DPs on a periodic basis (for example 1 year) for changes, updates, and corrections.					
Completed by Respondee	9 QAE/Lead Auditor <i>[Signature]</i>		Date 5/8/90		10 Branch Manager <i>[Signature]</i> Date 5/8/90	
	11 Response: LANL issues its QA Manual with its Table of Contents annotated to show superseded procedures and a reference to the new procedures. The Records Coordinator will be directed to develop a matrix of procedural (QP and DP) cross references. QP-05.1 and .2 will be revised to instruct the Records Coordinator to review procedural references in new and revised procedures and to prepare ICNs or further revisions as required to assure that cross references do not include obsolete, superseded, or rescinded procedures. This action is sufficient to address the observation.					
Completed by QA Org.	12 Signature: <i>[Signature]</i> Date: 7/12/90					
	13 Response Receipt Acceptable <input checked="" type="checkbox"/>					
	Initiator <i>[Signature]</i> for S. L. Crawford		Date 7/25/90		QA/Lead Auditor <i>[Signature]</i> Date 7/30/90	
14 Remarks:						Page 1 of 2

8 Discussion: (continued)

The following procedures are identified as examples only, and not for specific corrective action:

TWS-ESS-DP-03	Reference obsolete MSTQA-QP-14, MSTQA-QP-16
TWS-INC-DP-35	Reference obsolete MSTQA-QP-14, QAS-QP-07
TWS-INC-DP-78	Reference obsolete QAS-QP-0.5, QAS-QP-14
TWS-INC-DP-79	Reference obsolete MSTQA-QP-14, QAS-QP-07
TWS-INC-DP-80	Reference obsolete MSTQA-QP-14, QAS-QP-07, QAS-QP-14

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-1-06

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: S. L. Crawford		4 Date: 3-30-90	
	5 Organization: Los Alamos		6 Person(s) Contacted: D. Hobart, T. Morgan		7 Response Due Date is 20 Days from Date of Transmittal	
	<p>8 Discussion:</p> <p>Lawrence Berkeley Laboratory (LBL) procedures for YMP activities are prepared, reviewed, and approved under the Los Alamos QAPP and QP-05.2. The TWS-LBL-DP-XX procedures, although issued in their own controlled binder set, were not issued to various "reference" set Quality Assurance Binder (QAPP/QP/DP) assignees who have a need for the LBL procedures for reference purposes. These assignees include, for example: D. E. Shelor, D. G. Horton, J. E. Clark, K. L. Foster, J. L. Day, G. Gainer, R. R. Loux, and D. Porter.</p>					
Completed by Respondee	9 QA/Lead Auditor <i>[Signature]</i>		Date 4/11/90		10 Branch Manager <i>[Signature]</i> Date 4/16/90	
	<p>11 Response:</p> <p>Additional reference copies of the LBL technical procedures will be issued to D. E. Shelor, OCRWM; J. E. Clark, SAIC/LV; R. R. Loux, State of Nevada; and D. Porter, SAIC/GOLDEN; by June 29, 1990. K. Foster, G. Gainer, and J. Day have access to copies of the LBL procedures from the LANL records distribution center.</p>					
	<p>12 Signature: <i>[Signature]</i> Date: 7/12/90</p>					
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>					
	<p>Initiator <i>[Signature]</i> for S. L. Crawford</p> <p>Date 7/25/90</p>		<p>QA/Lead Auditor <i>[Signature]</i></p> <p>Date 7/30/90</p>			
<p>14 Remarks:</p>						
						<p align="center">Page 1 of 1</p>

YUCCA MOUNTAIN PROJECT OFFICE
YMPO OBSERVATION NO. 90-01-07






N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: R. L. Maudlin		4 Date: 3-29-90	
	5 Organization: Los Alamos		6 Person(s) Contacted: R. Morley		7 Response Due Date is 20 Days from Date of Transmittal	
	<p>8 Discussion:</p> <p>The purchase requisition and associated "Statement of Work" for the University of Colorado (Req. No. 8482Y) does not define which Los Alamos implementing procedures are required to perform the scope of work described by the "Statement of Work".</p>					
Completed by Respondee	9 QAE/Lead Auditor		Date		10 Branch Manager	
	<i>Richard P. Mandl</i> 05/08/90		<i>Colleen A. Hester</i> 5-8-90			
Completed by QA Org.	<p>11 Response:</p> <p>LANL plans no actions regarding this observation. The LANL QA Liaison, assigned responsibility for the University of Colorado (UCO) contract, monitors their work and assures that the UCO staff is trained to the procedures needed at the appropriate time, i.e. prior to quality-affecting work being performed.</p>					
	<p>12 Signature: <i>APD Jones</i> Date: 7/12/90</p>					
Completed by QA Org.	<p>13 Response Receipt Acceptable <input checked="" type="checkbox"/></p>					
	<p>Initiator</p> <p><i>P. Mandl</i> 07-26-90</p>		<p>QA/Lead Auditor</p> <p><i>S. Jones</i> 7/30/90</p>		<p>Date</p>	
<p>14 Remarks:</p> <p>NO VERIFICATION REQUIRED TO THIS OBS. TRAINING WILL BE EVALUATED DURING FUTURE AUDITS/SURVEILLANCES.</p>						
						<p>Page</p> <p>1 of 1</p>

YUCCA MOUNTAIN PROJECT OFFICE

1 YMPO OBSERVATION NO. 90-1-08

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: A. E. Cocoros		4 Date: 3-26-90	
	5 Organization: Los Alamos		6 Person(s) Contacted: H. Hunes		7 Response Due Date is 20 Days from Date of Transmittal	
	<p>8 Discussion:</p> <p>TW-QAS-QP-05.2, Rev. 2, Para. 1.0 states that the purpose of the QP is to describe the writing, reviewing, approving...of technical procedures (DP) used by Los Alamos and any of its' contractors. Throughout the rest of the procedure, there is no further reference to the subcontractor's effort. There is no indication that the subcontractor may write his own procedures. Also, Para. 6.2 does not refer to any technical or QA review by Los Alamos personnel of procedures developed by a contractor nor is there a procedural (con't)</p>					
Completed by Respondee	9 QAE/Lead Auditor		Date		10 Branch Manager	
			4/10/90			
Completed by QA Org.	11 Response:					
	<p>The LANL administrative procedure for Detailed Technical Procedures is currently on the QA Liaison Action List referenced in Observation No. 1. This observation will be incorporated into Revision 3 to QP-05.2 by August 15, 1990.</p>					
Completed by QA Org.	12 Signature: 					
	Date: 7/12/90					
	13 Response Receipt Acceptable <input checked="" type="checkbox"/>					
Completed by QA Org.	Initiator		Date		QA/Lead Auditor	
			7/25/90			
14 Remarks:						<p>Page 1 of 2</p>

8 Discussion: (continued)

requirement for Los Alamos personnel to sign the title page.

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-01-09N-QA-012
4/89

Completed by Originating Organization

2 Noted During: Audit 90-1

3 Identified By: A. E. Cocoros

4 Date:

3-26-90

5 Organization: Los Alamos

6 Person(s) Contacted: R. Herbst

7 Response Due Date
is 20 Days from Date
of Transmittal

8 Discussion:

The Los Alamos QA Program Plan for the Yucca Mountain Project (Los Alamos-YMP-QAPP-R4.4) provides instructions to apply the QA requirements to the technical activities conducted by Los Alamos in support of the Project. Los Alamos does not have a mechanism (procedure) for making changes to this QAPP.

9 QAE/Lead Auditor

Date

5/8/90

10 Branch Manager

Date

5/8/90

Completed by Respondee

11 Response:

The LANL QAPP or its implementing procedures do not currently address revisions to the QAPP itself. LANL internal deficiency reports, LANL DR No. LANL-0011 and DR No. LANL-0012, have been issued. A revision to Section 2 of the LANL QAPP will be prepared and sent to the Project Office for their review and approval as the proposed corrective action stated in the deficiency reports. LANL will take no further action regarding this observation.

12 Signature:

HP Ames

Date:

7/12/90

Completed by QA Org.

13 Response Receipt Acceptable ☒

Initiator

Allen

Date

7/25/90

QA/Lead Auditor

Date

S. Jones

7/30/90

14 Remarks:

Page

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YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-1-10

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: S. L. Crawford		4 Date: 3-30-90	
	5 Organization: Los Alamos		6 Person(s) Contacted: D. Broxton, C. Harrington, B. Crowe		7 Response Due Date is 20 Days from Date of Transmittal	
	<p>8 Discussion:</p> <p>AP-6.3Q identifies the YMP Sample Management Facility (SMF) provisions for the control of samples. Los Alamos procedure QP-08.1 identified AP-6.3Q provisions and requirements to certify field sample collection personnel in accordance with AP-6.3Q. Detailed technical procedures for sample collection and identification did not fully address or reference AP-6.3Q and/or QP-08.1. For example: (con't)</p>					
Completed by Respondee	9 QAE/Lead Auditor <i>[Signature]</i>		Date 4/11/90		10 Branch Manager <i>[Signature]</i> Date 4/16/90	
	<p>11 Response:</p> <p>LANL will review all of its sample management procedures and where appropriate make the necessary changes by August 22, 1990.</p>					
Completed by QA Org.	12 Signature: <i>[Signature]</i> Date: 7/12/90					
	13 Response Receipt Acceptable <input checked="" type="checkbox"/>					
	Initiator <i>[Signature]</i> for S. L. Crawford		Date 7/25/90		QA/Lead Auditor <i>[Signature]</i> Date 7/30/90	
14 Remarks:						<p align="right">Page 1 of 2</p>

8 Discussion: (continued)

TWS-ESS-DP-101, R1 (Change Request 139 initiated during audit)

TWS-ESS-DP-114, R1

TWS-EES-13-DP-606, R1 References AP-6.3Q, but does not reference QP-08.1
or provide for AP-6.3Q certified field sample
collection personnel.

YUCCA MOUNTAIN PROJECT OFFICE

1 YMPO OBSERVATION NO. 90-1-11

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: S. L. Crawford		4 Date: 3-30-90	
	5 Organization: Los Alamos		6 Person(s) Contacted: D. Hobart, T. Morgan		7 Response Due Date is 20 Days from Date of Transmittal	
	<p>8 Discussion:</p> <p>Laboratory analytical M&TE to be used by INC and LBL for YMP activities, and identified in Study Plans and detailed technical procedures (DP) have not been added to the "List of Calibrated Measuring and Test Equipment (M&TE)" by initiation of an M&TE Calibration Record per QP-12.1 (and previously by QP-12.2). The equipment has not been used under current QA program requirements yet. (con't)</p>					
Completed by Respondee	9 QA/Lead Auditor <i>[Signature]</i>		Date 4/11/90		10 Branch Manager <i>[Signature]</i> Date 4/16/90	
	<p>11 Response:</p> <p>LANL has already taken steps that will adequately address this observation as part of its closure actions for standard deficiency report SDR No. 490. LANL internal memo (TWS-EES-13-05-90-035) will cause all LANL groups, including subcontractors, to revise the M&TE calibration records which will cause an update to the LANL Yucca Mountain Project overall M&TE equipment listing.</p>					
Completed by QA Org.	12 Signature: <i>[Signature]</i> Date: 7/12/90					
	13 Response Receipt Acceptable <input checked="" type="checkbox"/>					
	Initiator <i>[Signature]</i> S. L. Crawford		Date 7/25/90		QA/Lead Auditor <i>[Signature]</i> Date 7/30/90	
14 Remarks:						<p>Page 1 of 2</p>

8 Discussion: (continued)

Examples:

Beckman NaI Gamma Counter (SP 8.3.1.3.5.1/2)
Baird Eagle Mount Atomic Emission Spectrometer (SP 8.3.1.3.5.1/2)
Alpha/Beta Liquid Scintillation Counter (SP 8.3.1.3.5.1/2)
Phillips Norelco X-Ray Powder Diffraction Analyzer (SP 8.3.1.3.5.1/2)
Varian Cary Spectrophotometer (TWS-INC-DP-78)
Perkin Elmer Ge/Li Gamma Counter (TWS-INC-DP-64)
Brookhaven/EG&G Autocorrelation Photon Spectroscope (TWS-INC-DP-75)

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-1-12

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-1		3 Identified By: R. L. Maudlin		4 Date: 3-29-90	
	5 Organization: Los Alamos		6 Person(s) Contacted: M. Williams		7 Response Due Date is 20 Days from Date of Transmittal	
	8 Discussion: TWS-QAS-QP-17.3, R0, Section 6.1 does not address all of the record review criteria that is specified in AP-1.7Q, Section 5.7.1. Items not addressed by QP-17.3 include a verification that records are authenticated, record contains WBS number, records in record packages are checked against table of contents received with packages, and QA designation noted on record. It was found that in practice all items are verified, however, the procedure lacks definition.					
Completed by Respondee	9 QAE/Lead Auditor		Date		10 Branch Manager	
	<i>R. L. Maudlin</i> 04-10-90		<i>[Signature]</i> 4/11/90			
Completed by QA Org.	11 Response: LANL will revise the records administrative procedure to meet the requirements of the new RECMP within 90 days of its receipt from the Project Office as a controlled document.					
	12 Signature: <i>[Signature]</i> Date: 7/12/90					
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>					
	Initiator	Date	QA/Lead Auditor	Date		
<i>[Signature]</i> 07-26-90		<i>[Signature]</i> 7/30/90				
14 Remarks: THE REQUIREMENTS OF AP.1.7Q HAVE BEEN RECEIVED.						

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YUC MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-01-13

N-QA-012
4/89

Completed by Originating Organization

2 Noted During: Audit 90-01

3 Identified By: M.J. Mitchell

4 Date:
03/28/90

5 Organization: Los Alamos

6 Person(s) Contacted: R. Herbst

7 Response Due Date
is 20 Days from Date
of Transmittal

8 Discussion:

The purpose of a technical procedure is to control the potential sources of uncertainty and error in activities. In order to achieve this end, specific requirements have been established for information to be included in procedures. This required information includes accept and reject criteria, calibration requirements, and accuracy and precision for recording data. Mandatory verification points should be included in the procedures, as applicable.

9 QAE/Lead Auditor

Date

10 Branch Manager

Date

S. Jones

5/8/90

Cathy A. Smith

5-8-90

Completed by Respondee

11 Response:

LANL will revise its administrative procedure for technical procedure preparation to address the concerns of this observation. Specific concerns that will be addressed include: accept/reject criteria, statements of accuracy and precision, and the use of verification and mandatory hold points. The documentation needs for each of these concerns will be clearly spelled out in the procedure. The observation report comments will be incorporated into the revised procedure by August 15, 1990.

12 Signature:

HP Jones

Date:

7/12/90

13 Response Receipt Acceptable ☒

Initiator

Martha J. Mitchell
27 July 1990

Date

QA/Lead Auditor

Date

S. Jones 7/30/90

14 Remarks:

Completed by QA Org.

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8 Discussion: (continued)

In several instances during Los Alamos Audit 90-01, it was noted by technical auditors that as part of good scientific practice, calculations, or other actions, were internally verified by Los Alamos technical staff. These actions were not identified as having been checked in laboratory notebooks and these checks were not identified as mandatory verification points in the controlling procedures. This indicates that there needs to be a better understanding of the purpose of technical procedures developed and used by Los Alamos on this project.

Credit should be taken for good scientific practice. Activities such as verification and new or expanded methods for research, or support activities including calibration, should be included in the technical procedures.

8 Discussion: (continued)

reviewed should be identified as preliminary and a mechanism needs to be established that can exclude such reports from the technical review cycle.

YUCCA MOUNTAIN PROJECT OFFICE
YMPO OBSERVATION NO. 90-01-14

N-QA-012
4/89

Completed by Originating Organization

2 Noted During: Audit 90-01

3 Identified By: M.J. Mitchell

4 Date:
03/28/90

5 Organization: Los Alamos

6 Person(s) Contacted: R. Herbst

7 Response Due Date
is 20 Days from Date
of Transmittal

8 Discussion:

During Los Alamos Audit 90-01, letter reports were found attached to monthly activity reports for the project. These letter reports were identified as Level III milestones and contain a considerable amount of data in some cases. These reports are viewed as internal, informal, and preliminary by the authoring staff members. Some of these letter reports originate at subcontract organizations. It appears that these reports are intended for administrative purposes only and for that reason do not receive technical review. Data included in activity reports that has not been technically

9 QAE/Lead Auditor

Date

S. Dan

5-8-90

10 Branch Manager

Date

Robert A. Springer 5-8-90

Completed by Respondee

11 Response:

LANL prepares a monthly report of technical progress for internal distribution. Information copies are provided to cognizant managers and interested staff at the Project Office. Further distribution and use of these reports is discouraged by the cover letter transmitting these reports and a disclaimer included inside of the front cover of the report itself. To emphasize the preliminary nature of data included in these reports, the following disclaimer has been added:

"This document has not received formal technical or policy review by Los Alamos or the Yucca Mountain Project. Data present in this document represents work progress and is not intended for release from the Department of Energy."

No further action is required by LANL regarding this observation report.

12 Signature:

H. M. Munes

Date:

7/12/90

Completed by QA Org.

13 Response Receipt Acceptable ☒

Initiator

Date

M. Mitchell 27 July '90

QA/Lead Auditor

Date

S. Dan 7/30/90

14 Remarks:

Page

1 of 2