



Department of Energy

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WBS 1.2.9.3
QA

AUG 06 1990

Thomas O. Hunter
Technical Project Officer
for Yucca Mountain Project
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P.O. Box 5800
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Albuquerque, NM 87185

CLOSURE OF STANDARD DEFICIENCY REPORT (SDR) 433, REVISION 0, RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE QUALITY ASSURANCE AUDIT 89-03 OF SANDIA NATIONAL LABORATORIES (SNL)

SDR 433, Revision 0, has been closed based on satisfactory verification of completed corrective actions. A copy of the SDR is enclosed for your files.

If you have any questions, please contact Catherine E. Hampton at (702) 794-7973 or FTS 544-7973, or Mario R. Diaz at (702) 794-7974 or FTS 544-7974 of the Yucca Mountain Project QA staff.

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

YMP:CEH-4388

Enclosure:
SDR 433

cc w/encl:
D. E. Shelor, HQ (RW-30) FORS
R. R. Richards, SNL, 6310, Albuquerque, NM
S. W. Zimmerman, NWPO, Carson City, NV
K. R. Hooks, NRC, Washington, DC

cc w/o encl:
J. H. Hines, OQD, AL
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08
S. R. Dippner, SAIC, Las Vegas, NV, 517/T-08
J. W. Gilray, NRC, Las Vegas, NV

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YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization	1 Date 9/13/89		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 2
	3 Discovered During AUDIT 89-3 (SNL)		3a Identified By S. HANS		4 SDR No. 433 Rev. 0
	5 Organization SNL		6 Person(s) Contacted R. RICHARDS		7 Response Due Date is 20 Working Days from Date of Transmittal
	8 Requirement (Audit Checklist Reference, if Applicable) (CL#15-10) A. QAP 16-2, Rev. A, para. 5.1.4 states in part, "Review the DR to ensure that the condition does not warrant a CAR..."				
Completed by Organization in Block 5	9 Deficiency 15 of 39 DRs reviewed by the auditor disclosed that the determination as to whether the DR should be elevated to a CAR was made prior to obtaining enough information to make a proper decision. Therefore, it is probable that some of				
	10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective 1. Review identified DRs to determine significance. 2. Determine if evaluation for significance is performed at appropriate step				
Completed by Organization in Block 5	11 QAE/Lead Auditor/Date <i>S. Hans 9/22/89</i>		12 Division Manager/Date <i>Nick Keegan 9-22-89</i>		13 Project Quality Mgr./Date <i>James Blaylock 9/22/89</i>
	14 Remedial/Investigative Action(s) A Remedial Action All Deviation Reports generated to date were re-reviewed by the QA Coordinator to evaluate whether Correction Action Reports were warranted (a CAR resulting from three of the DRs was subsequently issued). Complete. (cont'd.)				
	15 Effective Date <u>11/15/89</u>				
Completed by Organization in Block 5	16 Cause of the Condition & Corrective Action to Prevent Recurrence If the evaluation cited in 14B, above, indicates that procedure change(s) are necessary, those changes will be made and training conducted (if needed) in accordance with QAP 2-5. Responsible party R. R. Richards, due 12/15/89.				
	17 Effective Date <u>12/15/89</u>				
Comp. by Orig. QA Org.	18 Signature/Date <i>Jason W. Bingham 11/1/89</i> T. O. Hunter, Dept. Manager 6370				
	19 Response Accepted	QAE/Lead Auditor/Date <i>Amelia D. Over 2/21/90</i>	Division Manager/Date <i>Re Clark 2/21/90</i>	Project Quality Mgr./Date <i>[Signature] 7/30/90</i>	
	20 Corrective Action Verif. Satisfactory	QAE/Lead Auditor/Date <i>Rois Lee 7/27/90</i>	Division Manager/Date <i>N/A</i>	Project Quality Mgr./Date <i>[Signature] 7/30/90</i>	
	21 Remarks <i>Request amended response 11/2/90 - YMP: JB-1474</i> <i>Rec'd Amended Response, ltr dtd 11/24/90 - LES: 6315:mb</i> <i>Request for extension of corrective action implementation date, letter Hunter to Horton dated 11/1/90. Request granted, letter YMP: RBC-1760.</i> <i>Recent Response 3/5/90 - YMP: RBC-2265</i> <i>Verified issuance of CAR 89-02 on 9/14/89, closed on 12/8/89 and evaluation of DR process by J.V. Wright 12/8/89 which recommended revision to QAP 16-2. Revisions to QAP 16-2 in not complete dtd 3-12-90</i>				
22 QA CLOSURE	QAE/Lead Auditor/Date <i>Rois Lee 7/27/90</i>	Division Manager/Date <i>N/A</i>	PQM/Date <i>[Signature] 7/30/90</i>		

Response ltr dtd 11/1/89 - Hunter to Horton

ENCLOSURE

YMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

N-QA-038
12/88

SDR No. 433

Rev. 0

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8 Requirement (continued)

B. QAP 16-2, Rev. A, para. 5.3.2 states in part, "QA Coordinators periodically review completed DRs and their disposition to assure proper implementation of this QAP."

9 Deficiency (continued)

the 15 DRs were not elevated to CARs because of the improper review. The 15 DRs are noted below:

DR 89-01,02,03,04,06,11,12,13,15,24,29,33,34,35,38.

10 Recommended Actions (continued)

in DR process.

3. Make changes to procedures as necessary.
4. Perform training as required.

14 Remedial/Investigative Action(s)(cont'd.)

B Investigative Action:

An evaluation will be conducted to determine if the evaluation of whether deviations reported on DRs constitute significant conditions adverse to quality is called for at the appropriate point in the process in QAP 16-2. Responsible party - J. V. Voigt; due 11/15/89.

2.1.2) *Inst. Verification - 3/21/90 - YMP:CEH-2447*
Response - 4/4/90 - Hunter to Horton - Accepted 5/4/90 - YMP:CEH-3111
b) VERIFICATION OF REVISION TO QAP 16-2 COMPLETE
TRAINING TO THIS REVISION ONGOING, BUT INCOMPLETE. RBC 5/3/90
Inst Verification - 5/15/90 - YMP:CEH-3308

VERIFICATION OF PROPER & REQUIRED TRAINING AS CHECKED
ON TRAINING STATUS DATED 7/20/90 IS SATISFACTORY.

David Han 7/27/90

Amended Response SDR 433

Change block 14 to read:

- A. Remedial Action - All Deviation Reports generated to date were reviewed by the QA Coordinator to evaluate whether Corrective Action was warranted (a CAR resulting from three of the DRs was subsequently issued). Complete.
- B. Investigative Action - An evaluation has been conducted to determine if the evaluation of whether deviations reported on DRs constitute significant conditions adverse to quality occurs at the appropriate point in the QAP 16-2 process. That evaluation indicated that it, in fact, is appropriate to determine whether the DR indicates a significant adverse condition at a point later in the process. Complete.

As a result of that evaluation, QAP 16-2 will be revised, as indicated by the evaluation. Responsible Party - R. R. Richards, due 1/19/90.

Change block 15 to read, "1/19/90."

Change block 16 to read: "The "cause" of the condition stated in block 9, above, is that the opinion of the auditor concerning the appropriate place in the QAP 16-2 process for "significance determination" differed from what was called for in the procedure. As this condition is predicated entirely on the judgment and opinion of an individual, no specific, meaningful "corrective action" can be developed. (Note: In this case, no compliance deficiency occurred; for all 39 DRs, the requirement in block 8 ["Review the DR..."] was met.)"

Change block 17 to read, "N/A."

Ltr dtd 12/14/89 - Hunter to Hanton

Yucca Mountain Project Audit 89-03

Amended Response SDR 433

Change block 16 to read: "The cause of the condition cited in block 9, above, was that the Deviation Report process, as specified in QAP 16-2, required that a determination of whether a Corrective Action Report is warranted be done inappropriately early in the process. Action specified in block 14 B, above, addresses this cause.

Ltr dtd 1/24/90 - Hunter to Horton