

Department of Energy

Yucca Mountain Project Office P. O. Box 98608 Las Vegas, NV 89193-8608

WBS 1.2.9.3

AUG 0 6 1990

Thomas O. Hunter Technical Project Officer for Yucca Mountain Project Sandia National Laboratories P.O. Box 5800 Organization 6310 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, De

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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	I VIDA CTANDADO DEFICIENOV DEDADT			N-QA-038 4/89
one Its. Still 11/189- Hunter to Harten		1 Date 9/13/89	2 Severity Level	of 2
	ted by Originating QA Organization	3 Discovered During AUDIT 89-3 (SNL)	3a Identified By 4 SDR No. 433 Rev	, <u>0</u>
		5 Organization SNL	6 Person(s) Contacted R. RICHARDS 7 Response Du 20 Working E Date of Trans	Days from
		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"		
		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		
	Completed	10 Recommended Action(s): A Remedial A Investigative A Corrective 1. Review identified DRs to determine significance. 2. Determine if evaluation for significance is performed at appropriate step		
	Aprvl.	11 QAE/Lead Auditor/Da	ate 12 Division Manager/Date 13 Project Quality Mg	$\frac{1}{9}$ /z ² / $\frac{1}{8}$
	5	14 Remedial/Investigativ	e Action(s)	. /00
	pleted by Organization in Block	A Remedial Action	15 Effective Date11/15	1/89
		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.)		
		16 Cause of the Condition & Corrective Action to Prevent Recurrence 17 Effective Date 18		
	Compl	18 Signature/Date Jetten W. Bunglain 11/1/89		
	J. QA Org.	19 Response Accepted	OAE/Lead Auditor/Date Division Manager/Date Phoject Qualification of Clark 2/21/90 Section 2/21/90	1/2/01/40
		20 Corrective Action Verif. Satisfactory	Project Quality Date Division Manager/Date Project Quality Date Project Quality Date	y Mgr./Date
		21 Remarks Cegue	t amendia Beaponse 1/12/90 - YMP: JB-14-14	
	by Orig	Reguest for extension of corrective action implementation date, latter Hunder to Horton dated 1/11/90. Request granted, letter YMP: RBC -1760.		
San	Comp.	1 2 4 12	15/90 _trmp: RBC-2265 AR 89-02 on 9/14/89, closed on 12/8/89 and evaluation of DR proc A recommended revision to BAP-16-2. Revision to BAP 16:2 in not a	ion by ionplete dia 13
, ,			ead Auditor/Date Division Manager/Date POM/Date	1/30/20

ENCLOSURE

YMPO STANDARD DEFICIENCY REPORT CONTINUATION SHEET

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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 OAP."
- 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.

21.3) Inset Verefection - 3/21/90 - 4/17 CEH - 2447

Response - 4/4/90 - Hunter to Harton - Icrepted 5/4/90 - 4/190 - 4/190 - Hunter to Harton - Icrepted 5/4/90 - 4/190 - 4/190 OF REVISION TO QSP 16-2 COMPLETE

TRAINING TO THIS REVISION ONGOING BUT INCOMPLETE RBC 5/3/90

Unset Verification - 5/15/90 - 4MPCEH - 3308

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

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."

Lts dtd 12/14/89 - Henter to Heston

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.

. Ste dtd 1/24/90 - Hunter to Hanton