



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

WBS 1.2.9.3  
QA

MAY 06 1991

Robert F. Pritchett  
Technical Project Officer  
for Yucca Mountain  
Site Characterization Project  
Reynolds Electrical &  
Engineering Co., Inc.  
P.O. Box 98521  
Las Vegas, NV 89193-8521

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-91-031 RESULTING  
FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YM-91-02 OF  
REYNOLDS ELECTRICAL & ENGINEERING CO., INC.

The YMQAD staff has evaluated the response to CAR YM-91-031. 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 the date. Please send a copy of extension requests to Nita J. Brogan, Science Applications International Corporation, Las Vegas, Nevada.

If you have any questions, please contact Catherine E. Hampton at 794-7973 or A. Edward Cocoros at 794-7242.

  
Donald G. Horton, Director  
Yucca Mountain Quality Assurance Division

YMQAD:CEH-3519

Enclosure:  
CAR YM-91-031

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

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

YMP-5

9105150135 910506  
PDR WASTE  
WM-11 PDR

Add: K.R. Hooks

102.7  
WM-11  
NH03

**ORIGINAL**  
**THIS IS A RED STAMP**

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

14CAR NO.: YM-91-031  
DATE: 03/07/91  
SHEET: 1 OF 2  
QA  
WBS No.: 1.2.9.3

**CORRECTIVE ACTION REQUEST**

1 Controlling Document QP 5.1, and QP 5.3		2 Related Report No. AUDIT NO. 91-02	
3 Responsible Organization REECo		4 Discussed With R. Lykens and S. Archuleta	
10 Response Due 30 Days After Issue	11 Responsibility for Corrective Action R. F. Pritchett		12 Stop Work Order Y or N No
5 Requirement: <p>QP 5.1, Rev. 2, Para. 6.1.3.3 and QP 5.3, Rev. 1, Para. 6.3.4 state, "The organization developing the procedures shall assure that the procedure being developed does not conflict with existing procedures and, if so, that such conflicts are resolved."</p> <p>QP 5.1, Rev. 2, Para. 6.3.2.4 states, "Procedures shall be reviewed for possible revisions at least annually as a minimum."</p>			
6 Adverse Condition: <p>No objective evidence of compliance with the above referenced requirements was available.</p>			
7 Recommended Action(s): <p>Identify the remedial action(s) to be taken to correct the deficiencies noted in Block 6. Investigate the program process, activities or documentation to determine the extent and depth of similar deficient conditions on the CAR. Identify these deficiencies and provide the</p>			
8 Initiator A. E. Cocoros <i>A. E. Cocoros</i> 2/26/91		9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	
Date: 02/26/91		13 Approved By: OQA <i>Catherine H. Hupst</i> 3-8-91	
15 Verification of Corrective Action:			
16 Corrective Action Completed and Accepted: OAR _____ Date _____		17 Closure Approved By: OQA _____	

**ENCLOSURE**

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

CAR NO.: YM-91-031

DATE: 03/07/91

SHEET: 2 OF 2

**CORRECTIVE ACTION REQUEST  
(continuation sheet)**

**7 Recommended Action(s) (continued)**

measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

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

CAR NO. YM-91-031

DATE: 04-12-91

SHEET: 1 OF 4

CORRECTIVE ACTION REQUEST  
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-031

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

DISCUSSION:

The statement from QPs 5.1 and 5.3, that organizations developing procedures, assure that conflicts do not exist with other procedures is a guideline that needs to be considered when reviewing a procedure, but not necessarily documented. There are other guidelines that must be considered in generating a procedure which are contained in the same sections of QP 5.1 and 5.3. Part of the process of reviewing and approving procedures is that knowledgeable (i.e., of the requirements) and appropriately trained personnel are utilized.

In addition, QP 5.0, Instructions, Procedures And Drawings, ¶ 6.3.1.1 states in part;

"... shall be distributed to other organizations for review and comment, as applicable, when created and when revised for *both technical adequacy and compliance with QA requirements* (emphasis added), as required by QP 6.0."

Objective evidence is available and attached to demonstrate that this conflict guideline has been considered in the review of procedures.

Based on the above discussion and attached documentation, REECO/YMP considers that no further corrective action is required for this portion of CAR YM-91-031.

Response Approved:

Bruce Gordella For R.F.P.  
Responsible Manager

4/12/91  
Date

RESPONSE ACCEPTED:

N/A  
QAR

\_\_\_\_\_  
Date

RESPONSE ACCEPTED:

N/A  
QQA

\_\_\_\_\_  
Date

**YUCCA MOUNTAIN PROJECT  
DOCUMENT REVIEW RECORD**

CAR NO. YM-91-C31

DATE: 04-12-91

PAGE: 2 of 4

Document Reviewed: DD-IP-01 Rev: 1 Page 1 of 1

Document Title: Handling, Storage And Shipping

Document is Satisfactory \_\_\_\_\_ Document is Unsatisfactory X

REVIEWED BY:

*D. A. Hackbert*  
Signature

D. A. Hackbert

Name (type or print legibly)

01/29/91

Date

Organization REECo YMP Quality Assurance

Complete the above portion of this document. Review the document provided for compliance with procedures, specifications, technical and quality requirements. Justification shall be provided for all comments. The reviewers signature signifies the requested review has been completed. Where there are no comments, state "No Comments" in the Comment And Justification Section.

**COMMENT AND JUSTIFICATION**

**ACTION TAKEN**

1. Section 6.1 does not address the Inspection and Testing of Special Tools and Equipment as required by the QAPP, Section XIII, ¶ 1.3 or QP 13.0, ¶ 6.1.2.1.
2. Section 6.2.4 does not address that Storage Criteria may also be obtained from Design Specifications or the Purchase Order as required by QP 13.0, ¶ 6.2.4.
3. Section 6.2.5 does not address that Storage Areas must be provided with adequate drainage as required by QP 13.0, ¶ 6.2.5.
4. The procedure does not cover implementation of Care and Maintenance Instructions as required by QP 13.0, Section 6.6.
5. Section 7.0 needs to be updated to include those QA Records that will be generated based on the comments above.

6. <sup>per YMP</sup> Change references to "Yucca Mountain Site Characterization Project" (See Draft) 1/29/91

**COMMENTS APPROVED:**

Department Manager: PQA  
Organization

MONO A. FOX  
Printed Name

*[Signature]*  
Signature

1/29/91  
Date

All comments have been resolved:

Author: \_\_\_\_\_ Date: \_\_\_\_\_



**Reynolds Electrical & Engineering Co., Inc.**  
**YUCCA MOUNTAIN PROJECT**  
**DOCUMENT REVIEW RECORD**

CAR NO. YM-91-031

DATE: 04-12-91

PAGE: 3 of 4

Document Reviewed: DD-IP-02 Rev: 1 Page 1 of 1

Document Title: Control of Measuring And Test Equipment

Document is Satisfactory \_\_\_\_\_ Document is Unsatisfactory XXX

REVIEWED BY:

  
Signature

D. A. Hackbert

Name (type or print legibly)

02/12/91

Date

Organization REECO YMP Quality Assurance

Complete the above portion of this document. Review the document provided for compliance with procedures, specifications, technical and quality requirements. Justification shall be provided for all comments. The reviewers signature signifies the requested review has been completed. Where there are no comments, state "No Comments" in the Comment And Justification Section.

**COMMENT AND JUSTIFICATION**

**ACTION TAKEN**

1. Section 6.1.9 does not fully address the requirements of QP 12.0 § 6.3.5. Paragraph 6.3.5 requires an "evaluation be performed" when "M&TE is found out of calibration", not just when the M&TE is found "unacceptable for use" as stated in DD-IP-001, § 6.1.9. The Drilling Department should consider addressing the use of Form RE-0698 (7/88), "Out Of Tolerance Notification" in this procedure (copy attached). Quality Systems has a "Draft" procedure QA-12.2, Control of Measuring & Test Equipment (User Organizations) which will address this Form (RE-0698).

**COMMENTS APPROVED:**

Department Manager: YMP QA  
Organization

M. A. Fox  
Printed Name

  
Signature

2-13-91  
Date

All comments have been resolved:

Author: \_\_\_\_\_ Date: \_\_\_\_\_



**Reynolds Electrical & Engineering Co., Inc.**  
**YUCCA MOUNTAIN PROJECT**  
**DOCUMENT REVIEW RECORD**

CAR NO: YM-91-031

DATE: 04-12-91

PAGE: 4 of 4

Document Reviewed: IM-LRC-IP-01 Rev: 1 Page 1 of 1

Document Title: Yucca Mountain Project Records Management

Document is Satisfactory \_\_\_\_\_ Document is Unsatisfactory XXX

REVIEWED BY:

*D. A. Hackbert*  
Signature

D. A. Hackbert

Name (type or print legibly)

03/12/91

Date

Organization REECo YMP Quality Assurance

Complete the above portion of this document. Review the document provided for compliance with procedures, specifications, technical and quality requirements. Justification shall be provided for all comments. The reviewers signature signifies the requested review has been completed. Where there are no comments, state "No Comments" in the Comment And Justification Section.

**COMMENT AND JUSTIFICATION**

**ACTION TAKEN**

1. QP 5.3, ¶ 1.2, states in part, "The purpose of an Implementing Procedure (IP) is to provide direction for department peculiar activities which are not addressed in quality procedures." Sections 5.1, 5.3, 5.4, 5.5, 5.6, 6.1, 6.2, 6.3, 6.4 and 6.5 of IM-LRC-IP-01, contain instructions that pertain to departments other than the Information Management Office. It is recommended that those sections of IM-LRC-IP-01 that apply to other departments be included in QP 17.0. Only those IMO specific activities should be included in the IP.
2. QP 5.3, ¶ 5.1, states in part, "Department Managers are responsible for ... approving Implementing Procedures for activities performed by their department ...". IM-LRC-IP-01 indicates that the TPO is the approving authority, not the Department Manager as required by the QP.

**COMMENTS APPROVED:**

Department Manager: YMP QA

Organization

W. J. Glasser

Printed Name

*William J. Glasser* 3.12.91

Signature

Date

All comments have been resolved:

Author: \_\_\_\_\_ Date: \_\_\_\_\_

Original

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

CAR NO. YM-91-031  
DATE: 04-12-91  
SHEET: 1 OF 1

CORRECTIVE ACTION REQUEST  
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-031

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

All Quality Procedures and most Implementing Procedures may not have had an annual review as required by QPs 5.1 and 5.3.

B. Root Cause:

1. The cause of the missed annual review of procedures was an overly restrictive internal requirement, no clear requirement to document the review and a lack of management attention to detail.

C. Remedial Actions: (Item #1 To Be Completed By 05/31/91)

1. As there is no higher tier requirement for the annual review, QP 5.1 and 5.3 will be revised to delete the annual review requirement as it is presently stated. However, as a good business practice, a review will be performed every three (3) years to be consistent with REECO Company Policy 5.1.2. A revision to a procedure during the three year period will be considered as meeting the review requirement and a new three year period starts. This review will be documented.
2. YMP QA conducted a review on 04/05/91 to identify those QPs and IPs which are greater than three (3) years old. All existing QP or IP procedures are currently less than three years old and none will come due for review until 1992.

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 05/31/91)

1. Revise QPs 5.1 and 5.3 to clarify when a review needs to be performed.
2. Appropriate personnel will be indoctrinated on the changes to QP 5.1 and 5.3.

Response Approved: Bruce Sandels For R.F.P.

Responsible Manager

4/12/91

Date



Original

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

CAR NO. YM-91-031  
DATE: 04-23-91  
SHEET: 1 OF 1

CORRECTIVE ACTION REQUEST  
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-031

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

DISCUSSION:

The statement from QPs 5.1 and 5.3, that organizations developing procedures, assure that conflicts do not exist with other procedures is a guideline that needs to be considered when reviewing a procedure, but not necessarily documented. There are other guidelines that must be considered in generating a procedure which are contained in the same sections of QP 5.1 and 5.3. Part of the process of reviewing and approving procedures is that knowledgeable (i.e., of the requirements) and appropriately trained personnel are utilized.

In addition, QP 5.0, Instructions, Procedures And Drawings, ¶ 6.3.1.1 states in part;

"... shall be distributed to other organizations for review and comment, as applicable, when created and when revised for *both technical adequacy and compliance with QA requirements* (emphasis added), as required by QP 6.0."

Objective evidence is available and was attached to the original response to demonstrate that this conflict guideline has been considered in the review of procedures.

In order to prevent future ambiguity, QPs 5.1 and 5.3 will be revised by 05/31/91 to delete this requirement.

Response Approved: 127 Pritchett 4/23/91  
Responsible Manager Date

RESPONSE ACCEPTED: Allen 4/28/91  
QAR Date

RESPONSE ACCEPTED: Cathy Hays for 4-26-91  
OQA Date

Ltr dtd 4/23/91 - 580-01-377