



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

WBS 1.2.9.3
QA

APR 10 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-91-035 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT 91-02 OF REYNOLDS ELECTRICAL & ENGINEERING CO., INC.

The YMQAD staff has evaluated the response to CAR YM-91-035. 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 either Catherine E. Hampton at 794-7973 or A. Edward Cocoros at 794-7242.

Donald G. Horton, Director
Yucca Mountain Quality Assurance Division

YMQAD:CEH-3167

Enclosure:
CAR YM-91-035

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

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

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PDR WASTE
WM-11 PDR

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FULL TEXT ASCII SCAN

Add: K Hooks Ltr. Encl.
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**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

14CAR NO.: YM-91-035
DATE: 03/07/91
SHEET: 1 OF 2
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document
QP 18.0, Rev.7

2 Related Report No.
AUDIT NO. 91-02

3 Responsible Organization
REECO QA

4 Discussed With
M. Fox

10 Response Due
20 Days After Issue

11 Responsibility for Corrective Action
R. F. Pritchett

12 Stop Work Order Y or N
No

5 Requirement:

QP 18.0, Rev. 7, Para. 6.3.2.1 states, "Qualification of audit personnel shall be in accordance with QAPP 568-DOC-115, Appendix F, Paras. 1.2.1 and 1.2.3."

- o Para. 1.2.1 states, "The prospective Lead Auditor shall have the capacity to communicate effectively both orally and in writing. Those skills shall be attested to in writing by the Lead Auditor's employer."
- o Para. 1.2.3 states, "The prospective Lead Auditor shall have participated in a minimum of five (5) QA audits within a time not to exceed three (3) years prior to the date of qualification."

6 Adverse Condition:

No objective evidence of compliance with the above referenced requirements was available.

7 Recommended Action(s):

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

8 Initiator
A. E. Cocoros

Date:
02/28/91

9 Severity Level -
1 ☐ 2 ☒ 3 ☐

13 Approved By:

Date:

Cathleen Hopton 3-8-91

15 Verification of Corrective Action:

16 Corrective Action Completed and Accepted:

QAR _____ Date _____

17 Closure Approved By:

OQA _____

ENCLOSURE

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**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.

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DATE: 04-01-91

SHEET: 1 OF 4

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-035

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # 1

A. Extent of Deficiency:

REECo currently has only one individual qualified as Lead Auditor for whom a specific statement concerning acceptable communication skills has not been documented and for whom the available documentation does not demonstrate five audits within three years.

B. Root Cause:

At the time of certification as Lead Auditor by the Quality Assurance Manager, the basis for certification was considered to be an acceptable qualification and maintenance of qualification documentation from Mr. Hackbert's previous employer. This documentation contained a statement attesting to his communication skills and demonstrated that he had the required five audits at the time of his initial qualification. Since his qualification was appropriately maintained, REECo management at that time considered that this was an appropriate action for certification.

C. Remedial Actions: (All Actions To Be Completed By 05/15/91)

A sample review has been conducted of Mr. Hackbert's previous audit reports and other written documentation, as well as through oral discussions with Mr. Hackbert which demonstrates to the current Quality Assurance Manager that his communication skills are appropriate for certification as Lead Auditor. A memorandum has been appended to his current certification record to attest to his communication skills.

In order to determine if the basis for REECo certification as Lead Auditor based on the previous employer's qualification and maintenance of qualification records was appropriate (even though less than 5 audits in 3 years had been actually performed), REECo has initiated an Inquiry to the ASME NQA-1-1989 Code Committee. A favorable response to this inquiry, a copy of which has been attached to this audit response, will provide the basis for REECo to consider that Mr. Hackbert's qualification is valid without further documented audit participation. Since the Code Committee meets the week of April 22, 1991, REECo would expect to have a timely reply. REECo will provide an update to this corrective action by May 15, 1991.

Ltr dtd 4/1/91- 580-01-337

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CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-035 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # 1

D. Corrective Action to Prevent Recurrence:

In order to assure proper documentation of Lead Auditor qualification and a format for certification, all future qualifications and maintenance of qualification of Lead Auditors will be documented in the format recommended by Figure 2A-3.1 contained in NQA-1-1989, Appendix 2A-3, Nonmandatory Guidance on the Education and Experience of Lead Auditors.

Response Approved: R F Pritchett 4/1/91
Responsible Manager Date

RESPONSE ACCEPTED Allen 4/3/91
QAR Date

RESPONSE ACCEPTED Cather Hough fa 4/4/91
OQA Date



Reynolds Electrical & Engineering Co., Inc.

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IN REPLY REFER TO

580-01-333

WBS 1.2.9

QA

April 1, 1991

Michael Kozlik, Secretary
Committee on Nuclear Quality
Assurance
American Society of Mechanical
Engineers
345 East 47th Street
New York, NY 10017

INQUIRY CONCERNING QUALIFICATIONS OF LEAD AUDIT PERSONNEL

The Reynolds Electrical and Engineering Co., Inc. (REECo) requests an interpretation regarding the application of NQA-1 qualification requirements to a new employee's Lead Auditor certification.

REECo recently hired an individual who had been qualified and certified by a nuclear utility as a Nuclear Quality Assurance Lead Auditor in accordance with the requirements of ANSI N45.2.23. The individual's certification was current in November 1990 at the time of leaving the utility for the REECo position. As part of the REECo certification for Lead Auditor, the previous employer's qualification records and annual maintenance of qualification documentation were obtained and reviewed to confirm that the individual had met and maintained the certification requirements on ANSI N45.2.23. REECo considered that since the individual had met the Lead Auditor qualification requirements with respect to audit participation and that the Lead Auditor qualification had been properly maintained by his previous employer, then it would be appropriate to accept this information as the basis for audit participation for the REECo Lead Auditor certification to NQA-1. Also, prior to the REECo certification, a written examination was administered.

Based on the above information, REECo certified the new employee in December 1990 as a Lead Auditor to the requirements of NQA-1. However, a recent audit of the certification records questioned the basis for the REECo certification in that the individual had not performed five audits within the immediate preceding three years as is required for the initial qualification. This was apparently due to the individual's previous assignment as the employer's Audit Supervisor who only performed one audit per year to maintain the Lead Auditor qualification.

REECo

AN  COMPANY

Michael Kozlik
580-01-333
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ASME NQA-1-1989 SUPPLEMENT 2S-3 REQUIREMENT:

3.3 Audit Participation

The prospective Lead Auditor shall have participated in a minimum of five (5) quality assurance audits within a period of time not to exceed three (3) years prior to the date of qualification, one audit of which shall be a nuclear quality assurance audit within the year prior to his qualification.

4.1 Maintenance of Proficiency

Lead Auditors shall maintain their proficiency through one or more of the following: regular and active participation in the audit process; review and study of codes, standards, procedures, instructions, and other documents related to quality assurance program and program auditing; or participation in training programs(s). Based on annual assessment, management may extend qualification, require retraining, or require requalification. These evaluations shall be documented.

INQUIRY QUESTION:


Using a previous employer's Lead Auditor qualification and maintenance of qualification documentation, was it appropriate, with respect to the Audit Participation qualification requirement, for REECO to consider that the intent of the requirement had been satisfied as part of the basis for certification as Lead Auditor to NQA-1?

We would appreciate a timely review of our inquiry since the results will determine what actions are required of REECO to resolve the potential audit deficiency.

Should you require any further information or have any questions, please contact William Glasser of my staff at (702) 794-7562 or FTS 544-7562.

R F Pritchett
R. F. Pritchett, Manager
Yucca Mountain Project Division
YMP Technical Project Officer

RFP:WJG:rm

 Central Files THRU
Executive Office, M/S 555
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Boston, MA 02110