



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 19 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-91-029 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-91-029. 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 John S. Martin at 794-7881.

Catherine Hampton for
 Donald G. Horton, Director
 Yucca Mountain Quality Assurance Division

YMQAD:CEH-3352

Enclosure:
 CAR YM-91-029

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

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

FULL TEXT ASCII SCAN

YMP-5

9104260059 910419
 PDR WASTE
 WM-11 PDR

Add: Ltr. Encl.
 K Hooks 1 1

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

14CAR NO.: YM-91-029
DATE: 03/07/91
SHEET: 1 OF 2
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document
QAPP 568-DOC-115

2 Related Report No.
AUDIT NO. 91-02

3 Responsible Organization
REECO QSD

4 Discussed With
S. Archuleta, J. Donaldson

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:
Quality Assurance Program Plan (QAPP), Revision 8, Section V, Para. 1.0 states in part, "Documents shall include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished."

6 Adverse Condition:
Typically the NNWSI Volumes I through III reference that the governing codes (i.e., ASME, ANS, ANSI, ...) be utilized and consulted for further information and applicable criteria. The deficiency that exists is that no code of record has been established within the procedures to designate which year or addenda is applicable.

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
J. S. Martin

Date:
02/25/91

9 Severity Level -
1 2 3

13 Approved By:
OQA *Catherine H...* 38-91

Date:

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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CAR NO. YM-91-029DATE: 04-12-91SHEET: 1 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-029

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

REECO has reviewed the identified adverse condition and, after review of our current quality procedures, considers that the condition is limited to those activities governed by quality criteria IX, Control of Processes. REECO's procedures for this criteria contain a general requirement that special processes be conducted in accordance with applicable codes, standards, specifications, criteria, and other special requirements. The NNWSI Volumes I through III make reference to the governing codes but have not provided a reference to the actual code used. In general, the required codes to conduct an activity are set as part of a license application or by the design agency as part of a design specification. However, for the qualification of nondestructive test personnel, Supplement 2S-2 of NQA-1-1989 edition has specified SNT-TC-1A, June 1980 edition as the specific requirement. This appears to be the only specific code which has an effect on Control of Processes, i.e. nondestructive testing. REECO currently does not perform quality related nondestructive testing on the YMP project.

B. Root Cause:

The welding organization, in the absence of a defined code of record, did not recognize a need to identify the specific code used to determine the acceptability of the activity.

C. Remedial Actions: (All Actions To Be Completed By 09/09/91)

As part of the corrective actions identified for corrective action CAR-YM-91-028, REECO indicated that a statement shall be added to the Procedure Qualification Records (PQRs) and Weld Procedure Specifications (WPSs) to identify the date of issue and code or standard title utilized for generation of the welding document. This action is to be completed by April 15, 1991.

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CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-029 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

C. Remedial Actions: (Continued)

To ensure that applicable codes are defined, a revision to the YMP welding program shall assure that date of issue and code or standard title utilized for generation of the welding document (WPS, PQR, and Welder Qualification Record (WQR)) are defined on the document. This action which is also part of the corrective action for YM-91-028 is scheduled for completion September 9, 1991.

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 06/15/91)

A clarification will be added to REECO's Quality Procedures for Control of Processes (QP 9.0, QP 9.1, and QP 9.2) to identify that in the absence of a clearly defined applicable code, i.e. year and addenda, the organization using a governing code (i.e., ASME, AWS, ANSI,...) shall use the current year and addenda and clearly identify on the documentation what specific code was used in the performance of the process. This requirement will also be included in any future procedures prepared for the Control of Processes. The clarification will be implemented through a Quality Procedure Change notices by June 15, 1991.

Response Approved: Bruce Gendley For R.F.P. 4/12/91
Responsible Manager Date

RESPONSE ACCEPTED: [Signature] 4-15-91
QAR Date

RESPONSE ACCEPTED: [Signature] 4-16-91
OQA Date