



Department of Energy

Yucca Mountain Project Office

P. O. Box 98608

Las Vegas, NV 89193-8608

WBS 1.2.9.3

QA

AUG 01 1990

Richard J. Herbst
Technical Project Officer
for Yucca Mountain Project
Los Alamos National Laboratory
University of California
N-5, Mail Stop J521
P.O. Box 1663
Los Alamos, NM 87545

ACCEPTANCE OF AMENDED RESPONSES TO STANDARD DEFICIENCY REPORTS (SDRS) 464 AND 465, REVISION 0, RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE (PROJECT OFFICE) QUALITY ASSURANCE (QA) AUDIT 89-07 OF LOS ALAMOS NATIONAL LABORATORY (LOS ALAMOS)

The Project Office QA staff has evaluated and accepted your amended responses to SDRs 464 and 465, Revision 0, generated as a result of Project Office QA Audit 89-07 of Los Alamos. The SDRs will be closed after verification of satisfactory completion of the specified corrective actions. Copies of the SDRs are enclosed for your information.

Verification of completion of your corrective action will be performed after the effective dates that were provided. Any extension to these due dates must be requested in writing with appropriate justification prior to the due date. Please send copies of extension requests to Nita J. Brogan, Science Applications International Corporation, 101 Convention Center Drive, Las Vegas, Nevada 89109.

If you have any questions, please contact either Catherine E. Hampton at (702) 794-7973 or FTS 544-7973, or Stephen R. Dana at (702) 794-7176 or FTS 544-7176 of the Yucca Mountain Project QA staff.


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

YMP:CEH-4362

Enclosures:
SDRs 464 and 465

cc w/encls:
D. E. Shelor, HQ (FW-30) FORS
S. W. Zimmerman, NWPO, Carson City, NV
K. R. Hooks, NRC, Washington, DC
H. P. Nunes, LANL, Los Alamos, NM

YMP-5

9008140093 900801
PDR WASTE PDC
WM-11

102.7
WM-11
NH03
FILL TEXT ASCII SCAN

Richard J. Herbst

-2-

AUG 01 1990

cc w/o encls:

H. E. Valencia, LAAO

J. W. Hines, OGD, AL

A. R. Chernoff, MSD, AL

N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08

S. R. Dana, SAIC, Las Vegas, NV, 517/T-06

S. R. Dippner, SAIC, Las Vegas, NV, 517/T-08

J. W. Gilray, NRC, Las Vegas, NV

YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization	1 Date 11/14/89		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 23
	3 Discovered During Audit-89-7		3a Identified By S.L. Crawford		4 SDR No. 464 Rev. 0
	5 Organization Los Alamos Nat'l Lab		6 Person(s) Contacted R. Herbst, various PI's		7 Response Due Date is 20 Working Days from Date of Transmittal
Completed by Organization in Block 5	8 Requirement (Audit Checklist Reference, if Applicable) (Q#3-1, 3-2) YMP AP-1.10Q, Rev. 0, paras. 5.1.2 and 5.1.5 require project participants to perform a technical review of SCP study plans prior to submittal to the Project Office. LANL TWS-QAS-QP-03.3, Rev. 0, para 6.2.1,				
	9 Deficiency Several study plans, submitted to the Project Office subsequent to the effective date of AP-1.10Q, had been technically reviewed in a different form and content than the version actually submitted to the Project Office. No				
	10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective Identify the remedial action to be taken to correct the deficiencies noted in block 9. Identify the cause of the condition and the planned action to				
Completed by Organization in Block 5	11 QAE/Lead Auditor/Date <i>S. Jones 11/30/89</i>		12 Division Manager/Date <i>Robert Herbst 12-1-89</i>		13 Project Quality Mgr./Date <i>[Signature] 12/1/89</i>
	14 Remedial/Investigative Action(s) Refer to Page 3 of 3				15 Effective Date 2/16/90
Completed by Organization in Block 5	16 Cause of the Condition & Corrective Action to Prevent Recurrence Refer to Page 3 of 3				17 Effective Date 2/16/90
	18 Signature/Date <i>[Signature] 1/12/90</i>				
Comp. by Orig. QA Or	19 Response Accepted		QAE/Lead Auditor/Date <i>[Signature] 1/26/90</i>	Division Manager/Date <i>[Signature] 2/26/90</i>	Project Quality Mgr./Date <i>[Signature] 2/26/90</i>
	20 Corrective Action Verif. Satisfactory		QAE/Lead Auditor/Date <i>[Signature] 1/26/90</i>	Division Manager/Date <i>[Signature] 2/26/90</i>	Project Quality Mgr./Date <i>[Signature] 2/26/90</i>
	21 Remarks ① Def. SDR response, Herbst to Horton, dtd. 1/11/90 and response clarification and amendments LTR, Herbst to Horton (TWS-13-02-90-33) Accept Response 3/16/90 - YMP: RBC-2245 Remedial Response 4/23/90 - TWS-EE5-13-04-90-661 Accept Remedial Amended Response S. Jones 6/26/90 <i>[Signature]</i> (Cont'd) ② 6/26/90				
22 QA CLOSURE	QAE/Lead Auditor/Date	Division Manager/Date	PQM/Date		

TWS-EE5-13-01-90-065

YMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

N-QA-038
12/88

SDR No. 464

Rev.

Page 2 of 23

CAPM

8 Requirement (continued)

requires study plans to be "...reviewed technically according to QPS-3.02..."

9 Deficiency (continued)

check or review was documented to assure that changes occurring between the technical review and submission to the Project Office either did not impact technical content of the study plan or that an additional review of the changes for technical adequacy was performed.

It is noted that all study plans having technical reviews performed prior to AP-1.10Q (and prior to QP-03.3) have already been submitted to the Project Office. Only three (3) LANL study plans remain to be submitted.

10 Recommended Actions (continued)

prevent recurrence.

21 - Accept Amended Response ltr dtd 7/16/90 - YMP:CEH-3858
Amended Response 7/13/90 - TWS-EES-13-07-90-051
Additional Amended response acceptable S. Dana 7/26/90
CEH 7/26/90

14 Remedial/Investigative Actions

Remedial Action: The Project Office and DOE/Headquarters have already conducted additional reviews. No further remedial action is required.

Investigative Action: The SDR does not specify what the difference in format and content was, but we conclude that the difference was 1) the addition of a QA appendix, and 2) the addition of a brief abstract. For ongoing studies, the appendix includes quality assurance level assignments (QALAs) and a matrix. The QALAs were already reviewed and approved by the Project Office, no additional review was required. The QA appendix does not provide any new information-- it is a summary of information that is readily available from other sources. The abstract is a short (1-3 paragraph) summary of the existing technical content of the study plan and does not change the technical content of the plans.

The subject study plans have all undergone additional screening, technical, management, and quality assurance reviews at both the Project Office and DOE/HQ. Any problems associated with the additions would have been identified during these reviews.

16 Cause of Condition & Corrective Action to Prevent Recurrence

Cause of Condition: Compliance with verbal direction from the Project Office.

Corrective Action to Prevent Recurrence: Require LANL staff to obtain written confirmation of verbal direction from the Project Office.

SDR 463-Clarification

1. Add the following to Block 16-Cause of Condition & Corrective Action to Prevent Recurrence:

"Training will be provided to reviewers to identify the relationship of QP03.2 and QP03.16 and emphasize appropriate use of these procedures during the review process."

SDR 464-Amendment

1. Change Block 16-Cause of Condition and Corrective Action to Prevent Recurrence to read as follows:

"Cause-Study plans were not checked after changes(additions) were made to ensure changes did not impact technical content. These changes were made at the verbal direction of the Project Office."

"Corrective Action to Prevent Recurrence-Remaining Study Plans will be checked by Technical Reviewers to ensure any changes or additions do not impact technical content of the Study Plans prior to submittal to the Project Office."

SDR 465-Amendment

1. Change Block 14-Remedial\Investigative Action(s) to read as follows:

"Remedial Action-The DPs listed in Block 9 of the SDR will be reviewed and corrected as necessary to address acceptance and reject criteria or limits."

"Investigative Action-All remaining DPs will be reviewed to ensure that acceptance and reject criteria or limits are adequately addressed in these procedures. Corrections to remaining DPs will be made as necessary."

SDR 466-Amendment

1. Change Corrective Action to Prevent Recurrence in Block 16 to read as follows:

"All manual holders will be retrained in QP06.1 document control requirements. During the following quarter, the LANL QAS will verify from a random sample of QA Manuals that a 95% confidence level for the manuals has been achieved. In addition, an overview of QA Manuals for

Handwritten: 2/12/90 - TUS-EE3-13-02-90-033

"BEST AVAILABLE COPY"

YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization	1 Date 11-17-89		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 23
	3 Discovered During Audit 89-7		3a Identified By M. J. Mitchell		4 SDR No. 465 Rev. 0
	5 Organization Los Alamos Nat'l Lab		6 Person(s) Contacted R. Herbst, H. Nunes		7 Response Due Date is 20 Working Days from Date of Transmittal
	8 Requirement (Audit Checklist Reference, if Applicable) (Checklist Item N/A) LANL-YMP-QAPP, Rev. 4.4, Para. 3.1.6.1, states in part "DPs used for scientific investigations shall provide for the following as appropriate:				
	9 Deficiency Many DPs do not address acceptance and rejection criteria or limits or the applicability of this subject to the work covered by the DP. Examples of this condition include:				

Aprvl.	11 QAE/Lead Auditor/Date	12 Division Manager/Date	13 Project Quality Mgr/Date
	S. Dana 11/30/89	N. Herbst 12-1-89	[Signature] 12/1/89

Completed by Organization in Block 5	14 Remedial/Investigative Action(s)		15 Effective Date
	Refer to Page 3 of 3		2/16/90

Completed by Organization in Block 5	16 Cause of the Condition & Corrective Action to Prevent Recurrence		17 Effective Date
	Refer to Page 3 of 3		2/16/90

Completed by Organization in Block 5	18 Signature/Date			
	[Signature] 1/12/90			

Comp. by Orig. QA Org.	19 Response Accepted	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date
	20 Corrective Action Verif. Satisfactory	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date

21 Remarks: Sec Ltr. Herbst to Hoston, dtd 2/12/90, SDR Response Clarification & Amendments and SDR response Ltr. Herbst to Hoston, dtd. 1/11/90.
 accept Response 3/6/90 - YMP-RDC-2245
 Corrective Action Verification Unsatisfactory S. Dana 6/26/90
 Unsatisf. Verification ltr dtd 7/12/90 - YMP-CEH-3959
 Response 7/16/90 - Herbst to Hoston
 Amended Response Acceptable S. Dana 7/26/90 CEH 7/26/90

Comp. by Orig. QA Org.	22 QA CLOSURE	QAE/Lead Auditor/Date	Division Manager/Date	PQM/Date

Ltr. dtd 11/19/90 - Tuls. - EES-13-01-90-065

YMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

N-QA-038
12/88

SDR No. 465

Rev. 0

Page 2 of 23

CHP

8 Requirement (continued)

- o Acceptance and rejection limits and criteria, including required levels of precision and accuracy."

TWS-QAS-QP-05.2, Rev. 2, Para. 6.3.7.6 states in part "Include criteria (eg., prerequisites and final conditions) for ensuring that DPs have been performed correctly."

9 Deficiency (continued)

TWS-EES-DP-54, Rev. 1
TWS-EES-DP-102, Rev. 1
TWS-EES-DP-114, Rev. 1
TWS-EES-DP-124, Rev. 0
TWS-INC-DP-27, Rev. 0

10 Recommended Actions (continued)

determine the extent and depth of similar deficient conditions listed as examples on the SDR. Identify the deficiencies and provide the measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

14 Remedial/Investigative Action(s)

Investigative Actions: Review the following Dps for incorporation of accept reject criteria: DP 54, R1; DP102, R1; DP 114, R0; DP 124, R0; DP 27, R1. Of note, two procedures in Block 9 of the SDR reference the wrong revision number: TWS-EES-DP-114, Rev. 1, is actually Rev. 0, and TWS-INC-DP-27, Rec. 0, is actually Rev. 1. Further, review all remaining technical implementing procedures.

Remedial Action: Issue a change request to each of the above five referenced procedures to add an accept reject criteria section.

16 Cause of the Condition & Corrective Action to Prevent Recurrence

Cause of the Condition: The implementing procedure, QP-05.2, Preparation of a Detailed Technical Procedure, failed to adequately instruct the preparer on inclusion of accept/reject criteria limits.

Corrective Action to Prevent Recurrence: Issue a change request to QP-05.2, R1, incorporation the requirement for a specific section stating the accept/rejection criteria and limits. Modify other detailed technical procedures, as necessary, to include accept reject criteria limits.

SDR 463-Clarification

1. Add the following to Block 16-Cause of Condition & Corrective Action to Prevent Recurrence:

"Training will be provided to reviewers to identify the relationship of QP03.2 and QP03.16 and emphasize appropriate use of these procedures during the review process."

SDR 464-Amendment

1. Change Block 16-Cause of Condition and Corrective Action to Prevent Recurrence to read as follows:

"Cause-Study plans were not checked after changes(additions) were made to ensure changes did not impact technical content. These changes were made at the verbal direction of the Project Office."

"Corrective Action to Prevent Recurrence-Remaining Study Plans will be checked by Technical Reviewers to ensure any changes or additions do not impact technical content of the Study Plans prior to submittal to the Project Office."

SDR 465-Amendment

1. Change Block 14-Remedial\Investigative Action(s) to read as follows:

"Remedial Action-The DPs listed in Block 9 of the SDR will be reviewed and corrected as necessary to address acceptance and reject criteria or limits."

"Investigative Action-All remaining DPs will be reviewed to ensure that acceptance and reject criteria or limits are adequately addressed in these procedures. Corrections to remaining DPs will be made as necessary."

SDR 466-Amendment

1. Change Corrective Action to Prevent Recurrence in Block 16 to read as follows:

"All manual holders will be retrained in QP06.1 document control requirements. During the following quarter, the LANL QAS will verify from a random sample of QA Manuals that a 95% confidence level for the manuals has been achieved. In addition, an overview of QA Manuals for

See dtd. 2/12/90-TWS-EE-13-12-90-033

"BEST AVAILABLE COPY"

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

**THIS IS A YMP
ACTION ITEM**

NO. NN1-1990-3560

WBS 1.2.9.3
QA

QA RECEIVED

July 10, 1990

JUL 16 1990

TWS-EES-13-07-90-040

Mr. Donald Horton
Yucca Mountain Project Office
U. S. Department of Energy
P. O. Box 98608
Las Vegas, NV 89193-8608

Dear Mr. Horton:

SUBJECT: YUCCA MOUNTAIN PROJECT OFFICE QUALITY ASSURANCE AUDIT NO. 89-7, STANDARD DEFICIENCY REPORT (SDR), NO. 465, ACTION ITEM NO. NN1-1990-3560, AMENDED RESPONSE

Reference: Letter, Horton to Herbst, dated July 2, 1990

For your review is the amended response requested in the above referenced letter to SDR No. 465.

SDR No. 465, Revise the SDR to read as follows:

Block 14, Remedial/Investigative Action(s): LANL implementing procedure QP-05.2 will be revised to reflect the requirements of the LANL QA Program Plan, R4.3, Section 3.2.6.1. This will assure that DP development is consistent across all LANL detailed technical procedures (DPs). The revision to QP-05.2 will require that revisions to existing DPs incorporate procedural requirements, when appropriate.

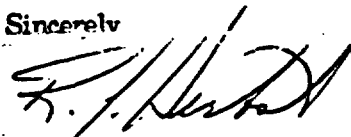
Block 15, Effective Date: August 31, 1990

Block 16, Corrective Action to Prevent Recurrence: Read training will be required before any LANL staff can prepare a new DP or revise an existing DP.

Block 17, Effective Date: September 30, 1990

If you have any questions regarding this amended response, please contact Henry Nunes at (FTS) 843-8039.

Sincerely



Richard J. Herbst

HPN/kb

Mr. Donald Horton
TWS-EES-13-07-90-040
July 10, 1990
Page 2

Cy: J. Blaylock, DOE/YMP, Las Vegas, NV
S. R. Dana, SAIC, Las Vegas, NV
J. Brogan, SAIC, Las Vegas, NV
A. K. Sacco, DOE/YMP, Las Vegas, NV
S. L. Bolivar, EES-1, MS D462
D. E. Broxton, EES-1, MS D462
K. Campbell, A-1, MS F600
J. A. Canepa, EES-13, MS J521
B. A. Carlos, EES-1, MS D462
M. J. Clevenger, EES-15, MS J495
E. M. Cole, LATA, MS M321
G. P. Cort, EES-13, MS J521
B. M. Crowe, EES-13/LV, MS J900/527
J. L. Day, LATA, MS M321
C. J. Duffy, INC-7, MS J514
M. H. Ebinger, EES-15, MS J495
K. G. Eggert, EES-5, MS F665
K. L. Foster, LATA, MS M321
C. D. Harrington, EES-1, MS D462
L. E. Hersman, LS-2, MS M880
D. E. Hobart, INC-11, MS G739
H. N. Kalia, EES-1/LV, MS J900/527
S. S. Levy, EES-1, MS D462
A. Meijer, INC-7, MS J514
T. L. Morgan, INC-7, MS J519
D. E. Morris, INC-11, MS G739
R. A. Morley, EES-1/LV, MS J900/527
J. T. Fabryka-Martin, INC-7, MS J514
H. P. Nunes, EES-13, MS J521
E. S. Patera, INC-DO, MS J514
B. A. Robinson, EES-4, MS D443
R. S. Rundberg, INC-11, MS J514
L. W. Schempp, MEE-9, MS J521
E. P. Springer, EES-15, MS J495
S. R. Sebring, MAT-3, MS P274
D. N. Simundson, LATA, MS M321
K. W. Thomas, INC-11, MS J514
I. R. Triay, INC-11, MS J514
D. T. Vaniman, EES-1, MS D462
K. A. West, EES-13, MS J521
RPC File (2), LATA, MS M321
TWS-EES-13-File, MS J521
QAS File, LATA, M321
CRM-4, MS A150

"BEST AVAILABLE COPY"