



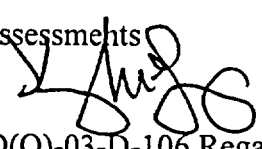
## Department of Energy

Washington, DC 20585

QA: QA

APR 24 2003

MEMORANDUM FOR: R. Dennis Brown (RW-3)

FROM: Kerry M. Grooms, Acting Team Lead Assessments  
Office of Quality Assurance 

SUBJECT: Closure of Deficiency Report (DR) ORD(O)-03-D-106 Regarding  
Improper Supersession of Administrative Procedure 5.1Q

The Office of Civilian Radioactive Waste Management staff has evaluated DR ORD(O)-03-D-106 and determined that no condition adverse to quality exists. As a result, the DR is considered closed.

If you have any questions, please contact me at (702) 794-1367.

OQA:KMG-1062

Enclosure:  
DR ORD(O)-03-D-106

cc w/encl:

James Blaylock, DOE/OQA (RW-3), Las Vegas, NV  
N. K. Stablein, NRC, Rockville, MD  
Robert Latta, NRC, Las Vegas, NV (2 cys)  
S. W. Lynch, State of Nevada, Carson City, NV  
L. W. Bradshaw, Nye County, Pahrump, NV  
W. J. Glasser, NQS, Las Vegas, NV  
D. G. Opielowski, NQS, Las Vegas, NV  
B. M. Terrell, DOE/ORD (RW-40W), Las Vegas, NV  
M. E. Van Der Puy, DOE/ORD (RW-30W), Las Vegas, NV



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

8. ☒ DEFICIENCY REPORT  
☐ CORRECTIVE ACTION REPORT  
NO. ORD(0)-03-D-106  
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DEFICIENCY-REPORT/CORRECTIVE ACTION REPORT

1. Controlling Document: (Document ID and Revision or Date)  
MP-5.1Q, Rev. 00, ICN 00

2. Related Report No.:  
NA

3. Responsible Organization:  
ORD Project Support

4. Discussed-With:  
Denny Brown

5. Requirement:

QARD Section 5.2.4 -Individuals shall comply with implementing documents, however:

A. When work cannot be accomplished as described in the implementing document, or accomplishment of such work would result in an undesirable situation, the work shall be stopped.

B. Work shall not resume until the implementing document is changed (in accordance with Section 6.0, Document Control) to reflect the correct work practices

2.2.12.A.4.-Ensure indoctrination and training are completed prior to performing the work.

6.2.5.C - The disposition of obsolete or superseded documents shall be controlled to ensure that they are not used to perform work.

6. Description of Condition:

MP-5.1Q, Processing of Procedures became effective 2/14/03. The Change History states that the MP supersedes AP-5.1Q, Plan and Procedure Preparation, Review and Approval. MP-5.1Q, Section 2.0, Applicability, states that AP-5.1Q will continue to be used for the processing of changes to Administrative Procedures (APs) and Line Procedures (LPs) until such time as it is cancelled. Once AP-5.1Q is cancelled, MP-5.1Q will be used to process changes to existing APs and LPs if such changes are needed.

As a result, MP-5.1Q is inconsistent with the QARD requirement based on the following:

1. The Applicability statement is contrary to QARD Sect. 5.2.4 because it allows project activities to be performed to a procedure (i.e., AP-5.1Q is replaced by MP-5.1Q) which is inconsistent with the AP-5.1Q definition of superseded and inconsistent with DOE policy and past practices.

2. QARD Sect. 2.2.12.A.4 has not been met in that development of the training module for MP-5.1Q is still in progress and staff have not been trained for new procedure development or procedure changes that are in progress as of 2/14.

3. QARD Sect. 6.2.5.C states that the disposition of superseded documents shall be controlled to ensure that they are not used to perform work; however MP-5.1Q states that work can be performed to a superseded procedure.

Has work been stopped? ☐ Yes ☒ No

7. Initiator:

Mark VanDerPuy

Printed Name

Signature

Date

9. Does a stop work condition exist?

☐ Yes ☒ No ☐ N/A

If Yes, Check One:

☐ A

☐ B

☐ C

☐ D

10. Recommended Actions:

None.

11. QA Review:

JAMES BLAYLOCK

Signature

Date 13/21/03

12. Response Due Date:

10 Working Days after Issuance

13. QAM Issuance Approval:

Printed Name R. Dennis Brown

Signature

James Blaylock

Date 3/26/03

14. Corrective Actions Verified/Closure

No corrective actions

Date 4/17/03

15. QAM Closure Approval:

R.D. Brown

Signature

Date 4/17/03

Submittal Page 1 of 2

2. Check if Amended ☐  
Check if also Initial Response ☒  
3. Extended Processing  
☒ No ☐ Yes (If yes, submit  
Extended Processing request)

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

1. DR/CAR NO. ORD(O)-03-D-106

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DEFICIENCY REPORT/CORRECTIVE ACTION REPORT COMPLETE RESPONSE

4. Extent of Condition: (Amended response will be required if all Extent of Condition investigations are not complete and documented herein)

None required, no condition adverse to quality exists. See the continuation sheet for details.

5. Impact: (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)

None required, no condition adverse to quality exists. See the continuation sheet for details.

6. Remedial Actions: (Document all actions necessary to address the results of the Extent of Condition)

None required, no condition adverse to quality exists. See the continuation sheet for details.

7. ☐ Root Cause (For a significant CAQ, attach root cause determination prepared in accordance with AP-16.4Q)  
☐ Apparent Cause

A review of the applicable QARD requirements and implementing procedures determined that a condition adverse to quality does not exist. See the continuation sheet for more detail.

8. Action to Preclude Recurrence: (Address those actions necessary to prevent the identified cause from recurring)

None required, no condition adverse to quality exists. See the continuation sheet for details.

9. Due Date for Completion of Corrective Action:

N/A

10. Responsible Manager

R. D. Brown

Printed Name

Signature

Date

11. QAR Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject  
☐ Re-evaluated for significance

12. QAM Concurrence:

R. D. Brown

Printed Name

Signature

Date

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

☒ DR/CAR/QO  
☐ SWO

NO ORD(O)-03-D-106

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**CONDITION ADVERSE TO QUALITY CONTINUATION PAGE**

The Director, Office of Quality Assurance, has determined that the condition identified on this Deficiency Report (DR) is not a condition adverse to quality.

**Conditions (1) and (3)**

The basis for this Deficiency Report (DR) is that AP-5.1Q, Plan and Procedure Preparation, Review, and Approval, was superseded by MP-5.1Q, Processing of Procedures. Both procedures describe a process for the preparation, review, approval, and revision of procedures. However, the scope of AP-5.1Q and MP-5.1Q are not the same. AP-5.1Q applies to Administrative Procedures (APs) and Line Procedures (LPs) whereas MP-5.1Q applies to Management Procedures (MPs), Office Procedures (OPs), and Team Procedures (TPs).

The Change History of MP-5.1Q does state that it supersedes AP-5.1Q. The intention was to transition from the APs and LPs, controlled under AP-5.1Q, to MPs, OPs, and TPs controlled under MP-5.1Q as part of the overall procedure transition effort. Eventually, when all APs and LPs had been replaced, AP-5.1Q would have been cancelled and MP-5.1Q would have 'superseded' it.

However, since the scope of the procedures is not the same, work could continue to the approved implementing document (AP-5.1Q or MP-5.1Q as appropriate) and the QARD requirement to control superseded or obsolete procedures was not violated. No condition adverse to quality exists.

**Condition (2)**

Even though MP-5.1Q was released for use, no work was or will be performed to MP-5.1Q. Therefore, no training or documentation required and no condition adverse to quality exists.