



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

WBS 1.2.9.3
 QA

AUG 23 1991

Larry R. Hayes
 Technical Project Officer
 for Yucca Mountain
 Site Characterization Project
 U.S. Geological Survey
 101 Convention Center Drive
 Suite 860
 Las Vegas, NV 89109

EVALUATION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-91-052
 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT
 YMP-91-05 OF U.S. GEOLOGICAL SURVEY

The YMQAD staff has evaluated your amended response to CAR YM-91-052. The amended 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-5339

Enclosure:
 CAR YM-91-052

cc w/encl:
 K. R. Hooks, NRC, Washington, ~~DC~~
 S. W. Zimmerman, NWPO, Carson City, NV
 T. H. Chaney, USGS, Denver, CO

cc w/o encl:
 J. W. Gilray, NRC, Las Vegas, NV
 N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08
 D. D. Porter, SAIC, Golden, CO

YMP-5

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 ADD: Ken Hooks
 CH. Grel. NH03
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**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

14 CAR NO.: YM-91-52
 DATE: 5/30/91
 SHEET: 1 OF 2
 QA
 WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document YMP-USGS-QAPP-01, R5	2 Related Report No. Audit No. YMP 91-05
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3 Responsible Organization USGS	4 Discussed With Peggy Warner
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10 Response Due 6/28/91	11 Responsibility for Corrective Action L. R. Hayes, USGS TPO	12 Stop Work Order Y or N N
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5 Requirement:

YMP-USGS-QAPP-01, R5, Criteria 17, Quality Assurance Records, Para. 17.4.1.2, states in part; Alternative Single Facilities: The following are acceptable alternatives to the criteria for a single facility:

- o Two-hour fire-rated vault that meets National Fire Protection Association (NFPA) 232-1975.
- o Two-hour fire-rated Class B file containers that meet the requirements of NFPA 232-1975.

6 Adverse Condition:

Contrary to the above requirements, YMP-USGS-QMP-17.01, R4, Para. 5.5.1, allows the utilization of a one-hour fire rated container.

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

8 Initiator J. S. Purvin <i>J. S. Purvin</i>	Date: 5/30/91	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: OQA <i>Catherine Harper</i>	Date: 5/30/91
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15 Verification of Corrective Action:

16 Corrective Action Completed and Accepted: QAR _____ Date _____	17 Closure Approved By: OQA _____
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WASHINGTON, D.C.

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(continuation sheet)

CORRECTIVE ACTION RESPONSE:

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION (CAR YM-91-52)

- A. **Extent of Deficiency:** The YMP-USGS Records Coordinator is reviewing QMP-17.01 R4, including all outstanding modifications, against the requirements in the YMP-USGS QA Program Plan, QAPP-01, R5, including changes proposed for Section 17 in the interim change notice referred to in Item C below. The results of this review will be outlined in a supplemental response by 8-1-91.
- B. **Root Cause: Oversight.** The temporary records storage requirements in paragraph C.2.2.1 of the Records Management Plan (RMP) R2, were referred to when Modification No. 4 for QMP-17.01, R4, was prepared. The more stringent requirements for one-of-a-kind records from paragraph C.2.2.2 of the RMP and QAPP-01, R5 were inadvertently missed.

If another cause is indicated by the investigation, the results will be outlined in the 8-1-91 supplemental response.

- C. **Remedial Action:** The YMP-USGS Records Coordinator has prepared an Interim Change Notice (ICN) for Section 17 of QAPP-01, R5. This ICN will provide the appropriate quality assurance requirements based upon the OCRWM QA Requirements Document (QARD). Anticipated approval is 8-1-91.

If the investigation reveals other discrepancies between the upper-tier documents and the implementing instruction, then appropriate actions will be taken and the results will be outlined in the 8-1-91 supplemental response.

- D. **Corrective Action to Prevent Recurrence:** By completing the investigative and remedial actions, the Records Coordinator will have gained more knowledge of the hierarchy of YMP-USGS quality assurance requirements, and will have completed a comprehensive review to assure consistency between the program requirements and the implementing instructions. No additional actions are warranted at this time. If the investigation indicates that additional actions are warranted, the preventive measures will be outlined in the 8-1-91 supplemental response.

RESPONSE APPROVED BY: _____

Dan R. H...

DATE: 6/28/91

Ltr dtd 6/28/91 - Cheney to Norton

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7 Recommended Action(s) (continued)

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

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DATE: _____

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CORRECTIVE ACTION REQUEST
(continuation sheet)

RESPONSE ACCEPTED

John S. [Signature]
QAR

7-2-91

Date

RESPONSE ACCEPTED

Anthony Hampton for
OQA

7-2-91

Date

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1. SUPPLEMENTAL RESPONSE FOR DEFICIENT CONDITION NOTED IN CORRECTIVE ACTION REQUEST NO. CAR YM-91-52

The following information is provided to supplement the 6/28/91 response.

- A. **Extent of Deficiency:** As outlined in the 6/28/91 response, the YMP-USGS Records Coordinator completed the review of implementing instructions and upper-tier requirements concerning records management requirements. No additional significant discrepancies were noted during this review. The OCRWM Quality Assurance Requirements Document (QARD) Revision 4 states that the requirements of NQA-1-1989 will be followed. NQA-1 provides for one-hour fire-rated containers to be used for the temporary storage of records, however YMP-USGS-QAPP-01 R5 currently does not distinguish unique requirements for the temporary storage of records. YMP-USGS-QMP-17.01 R4 included the NQA-1 requirement for the temporary storage of records. Modification 2 for YMP-USGS-QMP-17.01 R4 had been issued to clarify the use of UL-one-hour fire-rated-containers for the "temporary" storage of one-of-a-kind records during processing, review, or use. The QMP states that the LRC will use an approved "single storage facility" to provide storage (other than temporary) for one-of-a-kind items.
- B. **Root Cause:** The investigation revealed that the requirements for the "temporary storage" of records stemming from the Records Management Plan (RMP) Revision 2 and from the OCRWM QARD (NQA-1-1989) were different than those defined in the YMP-USGS-QAPP-01 R5. The requirements in the QAPP focused on those for single storage facilities, alternate single storage facilities and for the dual storage of records; and the QAPP required that the "temporary storage" for one-of-a-kind items meet the same requirements as those for single-storage facilities. Because the majority of records for the YMP-USGS are stored in "dual facilities", the QAPP requirements pertaining to one-of-a-kind items were inadvertently missed when the QMP-17.01 was modified.
- C. **Remedial Action:** The YMP-USGS Records Coordinator prepared an Interim Change Notice (ICN) for Section 17 of QAPP-01, R5. This ICN will clarify the YMP-USGS requirements concerning single storage, dual storage and temporary storage of records. It is anticipated that the ICN will be approved and issued by 8/30/91.

The actual storage conditions being implemented by the LRC personnel meet the requirements of the QARD (NQA-1-1989) and the proposed QAPP-01 R5 ICN, therefore, there has been no adverse impact.

Ltr dtd 8/1/91 - Houser to Haxton

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- D. Corrective Action to Prevent Recurrence: By completing the investigative and remedial actions, the Records Coordinator has gained more knowledge of the hierarchy of YMP-USGS quality assurance requirements, and completed a comprehensive review to assure consistency between the program requirements and the implementing instructions. The investigation did not indicate that additional actions are warranted.

RESPONSE APPROVED BY: Larry R. Hayes DATE: 8/1/91
Larry R. Hayes, YMP-USGS Technical Project Officer

Response Accepted: John M. [Signature] 8-5-91
QAR Date

Response Accepted: Catherine [Signature] 8-16-91
OQA Date