



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

QA: L

OCT 14 1994

Robert M. Nelson, Jr., Acting Project Manager, YMSCO, NV

ISSUANCE OF SURVEILLANCE RECORD YMP-SR-94-058 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) SURVEILLANCE OF THE FIELD CHANGE REQUEST (FCR) PROCESS (SCPB: N/A)

Enclosed is the record of Surveillance YMP-SR-94-058 conducted by the YMQAD at the Field Change Control Board facilities in Las Vegas, Nevada, and the Field Operations Center Building, Area 25, July 8 - August 17, 1994.

The purpose of the surveillance was to determine if FCRs are being processed in compliance with procedural requirements and to determine the effectiveness of the FCR process.

Corrective Action Requests (CAR) YM-95-001 and YM-95-002 were issued as a result of this surveillance. Response to these CARs, which were transmitted via separate letter, are due by the date indicated in Block 13 of the CARs.

This surveillance is considered completed and closed as of the date of this letter. A response to this surveillance record and any documented recommendations is not required. However, the open CARs will continue to be tracked until they are closed to the satisfaction of the quality assurance representative and the Director, YMQAD.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Fred H. Lofftus at 794-7190.

R. E. Spence

YMQAD:RBC-230

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

Enclosure:
Surveillance Record YMP-SR-94-058

210080

YMP-5

9410240119 941014
PDR WASTE
WM-11 PDR

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WM-11
NH03

OCT 14 1994

cc w/encl:

D. A. Dreyfus, HQ (RW-1) FORS
R. W. Clark, HQ (RW-3.1) FORS
W. L. Belke, NRC, Las Vegas, NV
~~U. G. Sprain~~, NRC, Washington, DC
R. R. Loux, NWPO, Carson City, NV
Cyril Schank, Churchill County Commission, Fallon, NV
D. A. Bechtel, Clark County Comprehensive, Las Vegas, NV
J. D. Hoffman, Esmeralda County, Goldfield, NV
Eureka County Board of Commissioners,
Yucca Mountain Information Office, Eureka, NV
Lander County Board of Commissioners, Battle Mountain, NV
Jason Pitts, Lincoln County, Pioche, NV
V. E. Poe, Mineral County, Hawthorne, NV
P. A. Niedzielski-Eichner, Nye County, Chantilly, VA
L. W. Bradshaw, Nye County, Tonopah, NV
William Offutt, Nye County, Tonopah, NV
Florindo Mariani, White Pine County, Ely, NV
B. R. Mettam, County of Inyo, Independence, CA
Mifflin and Associates, Las Vegas, NV
S. L. Bolivar, LANL, Los Alamos, NM
R. E. Monks, LLNL, Livermore, CA
W. J. Glasser, REECO, Las Vegas, NV
R. R. Richards, SNL, Albuquerque, NM, M/S 1333
R. P. Ruth, M&O/Duke, Las Vegas, NV
T. H. Chaney, USGS, Denver, CO
K. B. Johnson, SAIC, Las Vegas, NV
C. K. Van House, YMQAD/QATSS, Las Vegas, NV
R. L. Maudlin, YMQAD/QATSS, Las Vegas, NV
C. J. Henkel, NEI, Washington, DC
J. M. Replogle, YMSCO, NV
T. I. Fortner, YMSCO, NV

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

QUALITY ASSURANCE SURVEILLANCE RECORD

SURVEILLANCE DATA

¹ORGANIZATION/LOCATION:
Field Change Control Board,
(FCCB) Las Vegas Site

²SUBJECT:
Field Change Request (FCR) Process

³DATE: 7/8-8/17/94

⁴SURVEILLANCE OBJECTIVE:

To determine if FCRs are being processed in compliance to procedural requirements and determine effectiveness of the FCR process.

⁵SURVEILLANCE SCOPE:

The scope of this surveillance was limited to FCRs processed since the initial issue of YAP 3.4Q, 6/6/94.

⁶SURVEILLANCE TEAM:
Team Leader:

F.H. Lofftus

Additional Team Members:

P. H. Cotter

⁷PREPARED BY:

F. H. Lofftus/P. H. Cotter
Surveillance Team Leader

Date

7/7/94

⁸CONCURRENCE:

N/A

QA Division Director

Date

SURVEILLANCE RESULTS

⁹BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:

See pages 2, 3, 4, 5, and 6.

¹⁰SURVEILLANCE CONCLUSIONS:

See page 6.

¹¹COMPLETED BY:

Fred H. Lofftus
Surveillance Team Leader

Date

10/13/94

¹²APPROVED BY:

R. C. Spence
QA Division Director

Date

10/13/94

Block 9 (continued) Basis of Evaluation/Description of Observations:

The objective of this surveillance was to determine if FCRs are being processed in accordance with procedural requirements and to assess the effectiveness of the implementation of the field change control process. Listed below are the activities/procedure YAP 3.4Q requirements selected for evaluation:

1. Interim approvals of expedited FCRs are performed by personnel with documented delegation authorization.
2. Required evaluations associated with expedited FCR's are completed in a timely manner.
3. Stop work and extension requests are documented for expedited FCRs which are disapproved or when the time limit on interim approval is exceeded.
4. The interim approval step includes a Quality Assurance (QA) signature for Q-FCRs
5. Supporting documentation of impact analysis is adequate.
6. Evaluations were performed by the same affected groups or organizations that reviewed and approved the original document and that review criteria is identified.
7. YMQAD evaluates all FCRs identified as "QA".
8. Design FCR's, both "Q" and "non-Q", are evaluated by the design organization's QA.

The following personnel were contacted during the surveillance:

V. F. Iorii	Team Leader, Project Control Team, Department of Energy (DOE).
B. P. Cruz	Manager, Field Change Control Board Support, Management & Operating (M&O) Contractor
T. F. Myette	FCCB Secretary Configuration Management Specialist, M&O
D. A. Mikkelson	Engineering Support Specialist, Configuration Management Office, TRW/M&O

M. D. Moulder Controlled Document Center, Reynolds
Electrical and Engineering Company, (REEC) Inc.

W. J. Glasser Quality Assurance Manager, REEC

G. N. Bowman FCCB Secretary Designate, Configuration
Management Specialist, M&O

E. F. Dembowski FCCB Secretary Designate, Configuration
Management Specialist, M&O

The following documentation was reviewed during the course of the surveillance:

FCR Packages

94-136	94-138*	94-139	94-141	94-144
94-147	94-148	94-150	94-153*	94-155
94-156*	94-157	94-160	94-163	94-168*
94-172*	94-173*	94-174*	94-175*	94-176*
94-177	94-178	94-189*	94-191	94-195*
94-196	94-197	94-200	94-201	94-204
94-205	94-206	94-208*	94-212	94-213
94-217	94-218	94-221	94-223	94-224
94-228*	94-229	94-233	94-234	94-235*
94-239*	94-240*	94-243*	94-245	94-250*
94-253	94-255	94-257	94-258*	94-259
94-259	94-260	94-262*	94-263*	94-268*
94-269*	94-279*	94-311	94-324	94-325
94-327	94-339*	94-343*	94-344*	

* Expedited

Delegation of Authority Memorandums and Letters:

LV.NS.LDF.7/94-038 - Alternate Technical Project Officer (TPO),

LV.NS.LDF.6/94-030 - Alternate TPO,

LV.NS.LDF.6/94-033 - A/E on Sub-Surface Title III Engineering Support,

LV.NS.LDF.6/94-034 - A/E on Surface Title III Engineering Support,

YMP.44794 - Raytheon Services Nevada (RSN),

YMSCO:JRD-3456 - U.S. Department of Energy (DOE).

Below is a summary of the activities/procedural requirements selected to determine the effectiveness of implementation of the FCR process:

ACTIVITY No. 1.

- Review of FCR packages and letters/memorandums of delegation of authority disclosed that interim approvals of expedited FCRs were performed by personnel who had documented authorization.

ACTIVITY No. 2.

- Some evaluations of expedited FCRs were not completed with in the time limits specified in the procedure. This condition had been recognized prior to the surveillance by the FCCB and steps were taken to facilitate communication between requestor, evaluation, and the FCCB which should correct this condition. Note: prior to this it was perceived by field personnel that the FCCB was the "hold up" in processing the FCRs when in fact it had been the slow response time of the evaluators.

ACTIVITY No. 3.

- No examples were found in the review of expedited FCRs where a Request of Extension or a Stop Work was included in a FCR package. In all cases where the interim approval had expired or was later disapproved no physical work had been done. The reason was that these expedited FCRs were used only to expedite changes to documents verses doing physical work.

One FCR package, FCR 94-292, required additional documentation to provide objective evidence that no work had been performed during the 20 days between interim approval and disapproval by the FCCB. This was corrected during the surveillance.

ACTIVITY No. 4.

- Review of expedited "Q"-FCRs disclosed that three FCRs, 94-258, 94-292 and 94-339, had not received interim approval by Quality Assurance as required by the procedure. Note these FCRs were evaluated and approved by Quality Assurance later in the process.

This adverse condition was reported by CAR YM-95-01.

ACTIVITY No. 5.

- Review of FCR packages disclosed that several Field Change Evaluation Forms did not use a continuation page to document technical impact analysis.

The procedure was revised during the course of the surveillance to clarify that a continuation page is only needed if there is a technical impact resulting from the change.

- Review of FCR packages disclosed that one FCR package, 94-325, was missing an attachment and the document page was not annotated to reflect the change.

This adverse conditions was corrected during the course of the surveillance.

ACTIVITY No. 6.

- Review of FCR packages disclosed that in three cases, FCRs 94-258, 94-324, and 94-325, the evaluators, who evaluated the changes, noted on the Field Change Evaluation form "YAP 3.4" as the procedure used to perform the evaluation (which does not provide criteria) instead of the applicable procedure which identifies the review criteria.

This adverse condition was corrected during the course of the surveillance by reviewing all FCRs initiated since 6/27/94 and having the original reviewer correct the procedure identification and reinitial and date the form.

ACTIVITY No. 7

- Review of "Q"-FCR packages revealed that in one isolated case, FCR 94-311, that the package did not contain a Yucca Mountain QA Division evaluation.

This package was evaluated by YMQAD and approved during the course of the surveillance.

ACTIVITY No. 8.

- Review of Non "Q"-FCRs disclosed that some of the design related FCRs were not review by the design organization's QA as required by the procedure. M&O Procedure NLP-3-10, Revision 2 requires QA review only if the change effects QA controls.

This adverse condition was reported on CAR YM-95-02.

Block 10 (continued) SURVEILLANCE CONCLUSIONS :

It was determined that the over-all implementation of YAP 3.4 Q is effective. The surveillance disclosed eight adverse conditions, six were corrected during the surveillance and two were reported on CARs. The one area of concern is the use of the "Expedited FCR" to accelerate the change and review of design documents.

The excellent cooperation, time and effort expended by personnel of the Configuration Management and Field Change Control Board to assist in this surveillance was greatly appreciated.

Recommendations:

It is recommend that a high priority be placed on the revision under way on YAP 3.4-Q to simplify the process and reduce the time required to issue a FCR.

It is recommend that participants be reminded that Expedited FCRs are to be used to expedite changes only if physical work "At Risk" needs to be performed during the evaluation process and drawing and specification changes that will impact future or near term work should be processed as "Urgent".