



Department of Energy
Yucca Mountain Site Characterization
Project Office
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Las Vegas, NV 89193-8608

WBS 1.2.9.3
QA

JAN 03 1992

Willis L. Clarke
Acting Technical Project Officer
for Yucca Mountain
Site Characterization Project
University of California
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Livermore, CA 94551

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-018 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-92-05 OF LAWRENCE LIVERMORE NATIONAL LABORATORY

The YMQAD staff has evaluated the response to CAR YM-92-018. 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 Robert B. Constable at (702) 794-7945 or FTS 544-7945, or Richard L. Weeks at (702) 794-7853 or FTS 544-7853.

R.E. Spence

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-1476

Enclosure:
CAR YM-92-018

cc w/encl:
K. R. Hooks, NRC, Washington, ~~DC~~
S. W. Zimmerman, NWPO, Carson City, NV
R. E. Monks, LLNL, Livermore, CA

cc w/o encl:
J. W. Gilray, NRC, Las Vegas, NV
J. A. Blink, LLNL, Las Vegas, NV
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08

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PDR WASTE
WM-11 PDR

YMP-5

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WM-11
NH03
ADD: Ken Hooks 4H3
Ltr. Encl.*

ORIGINAL
THIS IS A RED STAMP

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

8 CAR NO.: YM-92-018
DATE: 12-10-91
SHEET: 1 OF 2
QA

CORRECTIVE ACTION REQUEST

| | | | |
|---|--|---|--|
| 1 Controlling Document 033-YMP-QP No. C, Revision 2 and 033-YMP-QP 18.0, Revision 3 | | 2 Related Report No. Audit Report YMP-92-05 | |
| 3 Responsible Organization LLNL | | 4 Discussed With R. Monks | |
| 5 Requirement: No. C, Terms and Definition, states in part, "Adverse Finding: 3) a violation of an established policy, procedure, instruction, or drawing requirement." Paragraph 18.0.5.6 states in part, "Each Adverse Finding is further identified and processed using a Corrective Action Report (CAR)..." | | | |
| 6 Adverse Condition: Contrary to the requirement above, LLNL issued Audit Reports for Audits 91-02, 91-010, 91-14 and 91-15 which identified conditions that, as defined by LLNL Terms and Definitions, are Adverse Findings however, the Adverse Finding conditions were documented as Observations, Recommendations or Comments. This condition is recurrent and was documented in CAR YM-91-060. | | | |
| 9 Does a significant condition adverse to quality exist? Yes <u>X</u> No <u> </u> If Yes, Circle One: (A) B C | | 10 Does a stop work condition exist? Yes <u> </u> No <u>X</u> ; If Yes - Attach copy of SWO If Yes, Circle One: A B C D | |
| | | 11 Response Due Date: 10 days from issuance | |
| 12 Required Actions: <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Extent of Deficiency <input checked="" type="checkbox"/> Preclude Recurrence <input checked="" type="checkbox"/> Root Cause Determination | | | |
| 13 Recommended Actions: Since this is a recurring condition an expedited response is requested of LLNL. Complete and document remedial actions taken to correct specific deficiencies. Investigate identified deficient documentation to determine extent of condition. | | | |
| 7 Initiator M. Diaz 12-10-91 Date | | 14 Issuance Approved by: QADD <i>R.C. Spruce</i> Date <u>12/10/91</u> | |
| 15 Response Accepted QAR <i>Richard A. Wicks</i> Date <u>12/31/91</u> | | 16 Response Accepted QADD <i>R.C. Spruce</i> Date <u>1/2/92</u> | |
| 17 Amended Response Accepted QAR Date | | 18 Amended Response Accepted QADD Date | |
| 19 Corrective Actions Verified QAR Date | | 20 Closure Approved by: QADD Date | |

ENCLOSURE

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

8 CAR NO.: YM-92-018

DATE: 12-10-91

SHEET: 2 OF 2
QA

CORRECTIVE ACTION REQUEST (Continuation Page)

13 Recommended Action(s) (continued)

Determine root cause of condition.

Document corrective actions taken to prevent recurrence of condition.

1. Corrective Action Response for CAR YM-92-018

- A. Remedial Action - LLNL will review Audit reports for Audits 91-02, 91-10, 91-14, and 91-15. All comments, recommendations and observations noted will be evaluated against the definition of adverse findings.

Responsible Individual: Royce E. Monks

Completion Date: 1/20/92

- B. Investigative Action - To determine the extent of this condition, LLNL will extend the review to cover all LLNL YMP internal and external audit reports generated as a result of audits performed between June 1991 and December 1991. All comments, recommendations, and observations noted will be evaluated against the definition of adverse finding.

Responsible Individual: Royce E. Monks

Completion Date: 1/20/92

- C. Root Cause Determination - This condition was first noted during the YMPO Audit of the LLNL YMP QA Program in June 1991. A CAR was issued (CAR YM-91-060) at that time. Considerable dialogue ensued between LLNL and YMPO concerning appropriate measures to be taken to close this CAR. Additionally an internal audit at LLNL pointed out that variations in definitions between the QP and the QP Manual Tab C allowed considerable leeway on the part of the individual auditor in making a determination of appropriate documentation of audit concerns. A final response to the CAR was accepted by YMPO in October 1991. The corrective action resulted in a change to the QP and elimination of definitions in the QP, eliminating alternative definitions in the QP and referring auditors back to definitions in Tab C.

- D. Corrective Action to Preclude Recurrence - QP 18.0, Rev. 3 and QP 18.1, Rev. 3 were issued for implementation on 11/1/91. Implementation of these procedures for future audits is expected to fully preclude recurrence of the noted condition. Change Notice C-2-1 was issued for implementation on 12/5/91. This Change Notice further clarified the definition of Adverse Finding.


Responsible Individual: Royce E. Monks

Completion Date: 1/20/92


Willis L. Clarke
Technical Project Officer
Yucca Mountain Project

Date

12/26/91


Royce E. Monks
Quality Assurance Manager
Yucca Mountain Project

Date

12/20/91

YMP-063-R0
10/15/91

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT
PROCEDURE COMPLIANCE DOCUMENTATION FORM

I have read, and understood and complied with Document QAAP16.1, Rev 4 ICN# N/A
in accomplishing my responsibilities in this procedure.

Signature Richard E. Spence Name (Printed) Richard E. Spence
Title Director YMQAD Date 12/10/91

I have read, and understood and complied with Document QAAP 16.1, Rev 4 ICN# N/A
in accomplishing my responsibilities in this procedure.

Signature Richard L. Weeks Name (Printed) RICHARD L. WEEKS
Title QA ENGINEER Date 12/31/91

I have read, and understood and complied with Document QAAP16.1, Rev 4 ICN# N/A
in accomplishing my responsibilities in this procedure.

Signature Richard E. Spence Name (Printed) Richard E. Spence
Title Director YMQAD Date 1/2/92

I have read, and understood and complied with Document _____, Rev _____ ICN# _____
in accomplishing my responsibilities in this procedure.

Signature _____ Name (Printed) _____
Title _____ Date _____

I have read, and understood and complied with Document _____, Rev _____ ICN# _____
in accomplishing my responsibilities in this procedure.

Signature _____ Name (Printed) _____
Title _____ Date _____

I have read, and understood and complied with Document _____, Rev _____ ICN# _____
in accomplishing my responsibilities in this procedure.

Signature _____ Name (Printed) _____
Title _____ Date _____