



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

WBS 1.2.9.3
 QA

DEC 03 1991

Carl P. Gertz, Project Manager, YMP, NV

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-007 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-91-I-01 OF THE YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT OFFICE

The YMQAD staff has evaluated the response to CAR YM-92-007. The response has been determined to be satisfactory. The additional information committed to in your response of November 22, 1991, should be submitted to this office on or before December 6, 1991. 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 794-7945 or Richard L. Maudlin at 794-7290.

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-867

Enclosure:
 CAR YM-92-007

cc w/encl:
 K. R. Hooks, NRC, Washington, DC
 S. W. Zimmerman, NWPO, Carson City, NV
 J. W. Estella, SAIC, Las Vegas, NV, 517/T-22

cc w/o encl:
 J. W. Gilray, NRC, Las Vegas, NV
 N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08
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 M. B. Blanchard, YMP, NV
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 PDR WASTE
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YMP-5

ADD: Ken Hooks Ltr. Encl.

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

14CAR NO.: YM-92-007
 DATE: 10/29/91
 SHEET: 1 OF 2
 QA
 WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document QAPD, DOE/RW-0215, Revision 3, ICN 3.1	2 Related Report No. Audit Report YMP-91-I-01
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3 Responsible Organization YMPO Procurement	4 Discussed With G. Phillips, C. Gertz
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10 Response Due 11/18/91	11 Responsibility for Corrective Action C. Gertz	12 Stop Work Order Y or N No
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5 Requirement:

QAPD, Revision 3, Section 4.0, Subsection 4.1 states: "Procedures are established and implemented for the control of procurement documents. The procedures define the methods and responsibilities for procurement planning and changes thereto. Procurement planning includes identifying the need for a specific service, determining the specific work to be accomplished, identifying appropriate technical and quality requirements, and identifying sources for the work."

Subsection 4.4 states in part: "Changes to procurement documents, other than minor changes...receive the same degree of control as utilized for the original documents."
 Section 5.0, Subsection 5.1 states in part: "Procedures are developed and implemented to ensure that methods to be used for performance of activities affecting quality are prescribed in documented plans, procedures, and instructions."

6 Adverse Condition:

Contrary to the above, neither QMP-04-02, Revision 0, ICN 1, or any other approved quality procedure adequately describes the procurement process for the preparation, review, approval and issuance of Management Agreements, Memoranda of Understanding or other similar documents such as guidance letters/technical letters which utilize existing open contracts maintained by the DOE Field Operations Offices to perform YMPO Project specific work.

The following statements are provided to support the above stated adverse condition.

A. For example, a guidance/technical letter (RSED:JRD-1991) was issued on 3/13/91 to the San Francisco Operations Office which dealt with Lawrence Berkeley Laboratory (LBL). Subsequent to that letter, on June 20, 1991, a Management Agreement was established between YMPO and the San Francisco Operations Office. The agreement was to allow assignment of YMPO quality affecting activities to San Francisco Operations Office

7 Recommended Action(s):

a. Develop an interim plan for procurement methodologies to control non-YMPO contracts, as deemed necessary, prior to issuance of a procedure that addressed the procurement issues identified in this CAR. In addition, consider the following

8 Initiator <u>R. E. Bone, ATL</u> R. L. Maudlin <u>R. L. Maudlin</u>	Date: <u>11/7/91</u>	9 Severity Level - 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: <u>R. E. Bone</u> OQA <u>R. E. Bone</u>	Date: <u>11/8/91</u>
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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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ENCLOSURE

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

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CORRECTIVE ACTION REQUEST
(continuation sheet)

6 Adverse Condition (continued)

contractors LLNL and LBL for which San Francisco Operations Office has an existing non-YMPO contract. Subsequent to the issuance of the Management Agreement, a guidance/technical letter (RSED:JRD-5069) was issued by YMPO to San Francisco Operations Office on August 13, 1991, which revised the specifics of the work to be performed. On 10/11/91, another guidance/technical letter (RSED:JMB-5500) was issued by YMPO directly to LBL.

The process by which the above example was accomplished is not defined in any YMPO approved quality procurement procedure.

- B. The Management Agreements have not been processed to the Central Records files.

7 Recommended Action(s) (continued)

recommendations when developing the interim plan.

- b. Obtain written confirmation from Headquarters as to which contracts have been transferred to YMPO control. (Refer to letter, YMP-JB-3866, dated 6/25/90).
- c. Conduct an indepth investigation into all existing procurements and identify which DOE Field Operation Offices are being directed to have their contractors perform quality-affecting work and list all of the contractors who are performing this work. Also, list by Field Operations Office and subordinate contractor what specific work is being accomplished and by who. Identify the Division Directors within YMPO who have delegated work in this manner and what specific task by WBS has been assigned.
- d. If quality-affecting work is being or may be performed by one of these contractors without an OCRWM approved QA program, take immediate action to suspend all quality-affecting work until their QA program has been approved.
- e. Investigate to determine if any quality-affecting work has been performed without an OCRWM approved QA program. If any quality-affecting work has been performed, determine what the effect on quality was in the absence of an approved QA program.
- f. Develop a comprehensive procurement procedure which addresses all aspects of procurement in any form which it may take.
- g. Investigate to determine if appropriate QA records of procurement documents exist and are properly located.
- h. Determine the cause of this condition and take measures to preclude recurrence.

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U.S. DEPARTMENT OF ENERGY
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CAR NO. YM-92-007
DATE: 11/15/91
SHEET: 1 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE:

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION

A. Extent of Deficiency: The extent of this deficiency at this time is indeterminant. The YMPO plans to take the following actions in order to address the extent of the deficiency:

- (1) YMPO will obtain written confirmation from Headquarters as to which contracts have been transferred to YMPO control. A letter requesting this information will be transmitted to Headquarters no later than November 22, 1991, requesting a response by December 27, 1991. Responsibility for this action is assigned to Garth Phillips.
- (2) YMPO will conduct an in-depth investigation into all existing procurements and identify which DOE Field Operation Offices are being directed to have their contractors perform quality-affecting work and list all of the contractors who are performing this work. Included in this will be a list by Field Operations Office and subordinate contractor what specific work is being accomplished and by whom. We will also identify the Division Directors within YMPO who have delegated work in this manner and what specific task by WBS has been assigned. A draft of this listing will be complete by December 6, 1991. A final listing will be created after the written confirmation of contracts has been received from Headquarters (per item (1), above). Responsibility for the completion of this action is assigned to Gary Roberson.
- (3) If it is determined that quality-affecting work is being or may be performed by one of these contractors without an OCRWM approved QA program, immediate action will be taken to suspend all quality-affecting work until the contractor QA program has been approved. The actions to suspend all quality-affecting work will be taken within 72 hours after they are identified. Responsibility for this action is assigned to the responsible Division Directors, with coordination provided by Gary Roberson.

Ltr dtd 11/15/91 - YMP:RVB-863

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

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CORRECTIVE ACTION REQUEST
(continuation sheet)

- B. Root Cause: Due to the complex nature of this deficiency, the root cause is still under determination. The results of this determination will be provided to you by December 1, 1991, in a supplemental response to this Corrective Action Request.
- C. Remedial Action: The following remedial actions have been or will be taken to address this deficient condition:
- (1) YMPO has developed an interim plan for procurement methodologies to control non-YMPO contracts, as deemed necessary, prior to issuance of a procedure that addressed the procurement issues identified in this CAR. The recommended actions outlined in the CAR have been considered in the development of the interim plan. The interim plan is documented in a memorandum from Carl Gertz to Distribution, YMP:MBB-764, dated November 12, 1991, a copy of which is attached for your information. This action is complete.
 - (2) Following the completion of the investigation described in item A, (2), above, YMP will determine if any quality-affecting work has been performed without an OCRWM approved QA program. If any quality-affecting work has been performed, we will determine what the effect on quality was in the absence of an approved QA program. This determination will be completed within 30 working days of the identification of the performance of the quality-affecting work. Responsibility for completion of this action is assigned to the responsible Division Director, with oversight from Robert Barton.
 - (3) The YMP will investigate to determine if appropriate QA records of procurement documents exist and are properly located. This investigation will be complete by December 6, 1991, with a plan to submit any records by January 10, 1992. Responsibility for this action is assigned to Garth Phillips.
- D. Corrective Action to Prevent Recurrence: This action will be established upon completion of the root cause analysis and will be provided as part of the supplemental response on December 1, 1991.

Response Approved: Maxwell Blanchard
Responsible Manager

11-15-91
Date

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

CAR NO. YM-92-007
DATE: 11/19/91
SHEET: _____ OF _____

CORRECTIVE ACTION REQUEST
(continuation sheet)

Response Accepted: _____
QAR Date

Response Accepted: _____
OQA Date

SEE AMENDED RESPONSE.



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

WBS 1.2.9.1.1.Y
QA

NOV 12 1991

Distribution

DEVELOPING INTERIM GUIDANCE FROM THE U.S. DEPARTMENT OF ENERGY (DOE) TO YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT (YMP) PARTICIPANTS FOR PERFORMING WORK THAT IS SUPPORTING ITEMS ON THE Q-LIST (REFERENCE YMP 90-55, REVISION 0) OR THE QUALITY ACTIVITIES LIST (REFERENCE YMP 90-56, REVISION 4)

As a result of reviewing the draft information provided to me by Richard Powe, lead auditor, after the Quality Assurance (QA) Audit of the YMP, I have decided that this office will adopt the following process for issuing program or technical guidance, directions, instructions or clarifications to any participant that will perform work that is expected to be quality affecting when implementing the guidance, directions, instructions or clarifications. This process will apply to new work, changes to ongoing work, and any ongoing work that is not yet covered by an existing grading package, and will remain in effect until we can implement an approved procedure, now under development, that will describe the process YMP uses to ensure that no quality-affecting work will be done without clear evidence that it adequately meets the provisions of Administrative Procedure 5.28Q (Quality Assurance Grading) and, hence, satisfies the applicable parts of the Quality Assurance Requirements Document.

Until further notice, please implement the following:

1. When preparing letters containing quality-affecting program or technical guidance, directions, instructions or clarifications to any YMP participant for new work, changes to ongoing work, or ongoing work that is not yet covered by an existing grading package, be sure to include in the opening paragraph the following information.
 - a. Number of the contract, memorandum of understanding, management agreement, or other vehicle that defines the responsibilities and requirements of the participant to DOE.
 - b. Work Breakdown Structure (WBS) number of the work described elsewhere in the letter.
 - c. Number on the Q-List or Quality Activities List that the work falls under.
 - d. Number of the grading package that identifies the controls that apply to the work being requested or performed .
 - e. Number, and name of participant, of the Quality Assurance Program Description document that contains the QA requirements that the work must comply with.
 - f. If d. or e. do not exist yet, then prepare a Corrective Action Report in accordance with Quality Assurance Administrative Procedure 16.1, Revision 4, as an enclosure that describes when d. and e. will be in place before the quality-affecting work can be initiated.

Multiple Addressees

-2-

2. To ensure that the chain-of-command is appropriately followed from a DOE procurement and QA standpoint, the letters should be prepared by the division directors or branch chief cognizant of the work, concurred with by the following persons (or their representative), and submitted to me for signature as the contracting officer's technical representative. These letters will become quality-affecting documents and filed as records in accordance with Quality Management Procedure 17-01 under WBS element 1.2.9.1.1.Y.
 - a. Division Director responsible for work
 - b. YMP Procurement Officer
 - c. Other affected Division or Office Directors (e.g. Project Control)
 - d. Yucca Mountain Quality Assurance Division (YMQAD)
 - e. Senior Technical Manager
 - f. Deputy Project Manager

The review and approval by YMQAD will provide an independent check that the information supplied in 1. above is accurate and that the scope of the work does not exceed the participant's QA program.

If you have any questions, please contact Maxwell B. Blanchard at 794-7939 or Robert V. Barton at 794-7957.



Carl P. Gertz
Project Manager

YMP:MBB-764

cc:

D. G. Horton, HQ (RW-3) FORS
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W. L. Clarke, LLNL, Livermore, CA
J. A. Blink, LLNL, Las Vegas, NV
R. J. Herbst, LANL, Los Alamos, NM
T. E. Blejwas, SNL, 6310, Albuquerque, NM
J. H. Nelson, SAIC, Las Vegas, NV
R. F. Pritchett, REECO, Las Vegas, NV
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