

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

WBS 1.2.9.3
QA

NOV 01 1991

Robert F. Pritchett
Technical Project Officer
for Yucca Mountain
Site Characterization Project
Reynolds Electrical &
Engineering Co., Inc.
P.O. Box 98521
Las Vegas, NV 89193-8521

VERIFICATION OF CORRECTIVE ACTIONS AND CLOSURE OF CORRECTIVE ACTION REQUESTS
(CARS) YM-91-037 AND YM-91-038 RESULTING FROM YUCCA MOUNTAIN QUALITY
ASSURANCE DIVISION (YMQAD) AUDIT 91-02 OF REYNOLDS ELECTRICAL & ENGINEERING
CO., INC.

The YMQAD staff has verified the corrective actions to CARs YM-91-037 and
YM-91-038 and determined the results to be satisfactory. As a result, the
CARs are considered closed.

If you have any questions, please contact either Robert B. Constable at
794-7945 or Robert H. Klemens at 794-7734.

R. E. Spence

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-592

Enclosure:
CARs YM-91-037 and YM-91-038

cc w/encl:
K. R. Hooks, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
W. J. Glasser, REECO, Las Vegas, NV

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

Add: K. R. Hooks #1 Encl
WM-11
102.7
WJH03

Received with letter dtd.
11/01/91

ORIGINAL
THIS IS A RED STAMP

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

14CAR NO.: YM-91-037
DATE: 03/07/91
SHEET: 1 OF 2
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document QP 17.0		2 Related Report No. AUDIT NO. 91-02	
3 Responsible Organization REECO		4 Discussed With C. Thompson, R. Pritchett, M. Fox	
10 Response Due 30 Days After Issue	11 Responsibility for Corrective Action P. F. Pritchett		12 Stop Work Order Y or N No
5 Requirement: <p>QP 17.0, Rev. 4, Paras. 5.4 and 5.4.5 state, "Each organization generating records is responsible for the control, authentication and distribution of its own records, including transmitting the original, or best available copy to the LRC for processing."</p> <p>Para. 6.1.1 states in part, "As a minimum, QA records shall include documents which specify, verify, or affect quality, i.e., results or reviews, audits monitoring of work performance and closely related documents such as qualifications of personnel, procedures."</p> <p>IM-LRC-IP-01, Rev. 0, Para. 6.1.4.2 states in part, "Each Record Package shall contain a Table of Contents and be listed on the Records Administrator Submittal Form. Upon completion of Submittal Form, the completed record package, along with the Submittal Form and the Table of Contents, shall be transmitted to the LRC within 10 working days after the closeout of the</p>			
6 Adverse Condition: <p>Contrary to the above requirements, QA Record Packages for procedures and their revisions, plus QA Record Packages described in REECO QA Implementing Procedures, cannot be found within the QA Records System, or have not been transmitted to the LRC in a timely manner. Examples of this are as follows:</p> <ol style="list-style-type: none">1. No documented evidence was found that the QA, IP, QS, Calibration and Welding procedures were received by the LRC as QA Record Packages. NOTE: REECO Internal Audit No. REECO-001-90, AFR-5, previously reported that the Physical Standards Laboratory and Weld Laboratory records have not been transmitted to the LRC. Reference Updated Responses to AFR-5, dated 02/20/91.2. The Management Assessment for 1990 and the Readiness Review for Midway Valley activities			
7 Recommended Action(s): <p>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 the</p>			
8 Initiator M. R. Diaz <i>Mario Diaz</i>	Date: 02/28/91	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: OQA <i>J. B. Blaylock</i> Date: 3/12/91
15 Verification of Corrective Action: <p><i>Corrective Action Verification Statement Attached - RWC 10/25/91</i></p> <p style="text-align: right;">102.7</p>			
16 Corrective Action Completed and Accepted: OAR <i>Robert H. Blumens</i> Date <i>10/25/91</i>		17 Closure Approved By: OQA <i>R. C. Spence</i> <i>10/31/91</i>	

ENCLOSURE

**OFFICE OF CIVILIAN
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WASHINGTON, D.C.**

CAR NO.: YM-91-037

DATE: 03/07/91

SHEET: 2 OF 2

**CORRECTIVE ACTION REQUEST
(continuation sheet)**

5 Requirements (continued)
record package."

6 Adverse Condition (continued)
have not been transmitted as a QA record package.

3. Audit REEC0-004-90, report was issued on May 29, 1990 and the last finding was closed on July 7, 1990. However, it was transmitted to the LRC on November 7, 1990.

4. Audit REEC0-005-90, report was issued on June 6, 1990 and the last finding was closed on June 26, 1990. However, it was transmitted to the LRC on November 7, 1990.

7 Recommended Action(s) (continued)
measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

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CAR NO. YM-5
DATE: 04-12-91
SHEET: 1 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-037

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

- o A sample review of record packages was performed and determined that many record packages may be missing from the Local Record Center (LRC).
- o For those record packages currently in the LRC, many were not submitted in accordance with the 10-day turnover requirement.

B. Root Cause:

Record Sources have not complied with the records requirements described in the governing procedures as evidenced by their failure to implement the classroom training and guidelines provided.

C. Remedial Actions: (All Actions To Be Completed By 10/15/91)

1. A review will be conducted to determine how many record packages should have been generated by Quality and Implementing Procedures. Once a list is determined, a comparison will be made to those record packages contained in the records system. If packages are missing, the Records Source will be requested to obtain and transmit it to the LRC. If a complete records package can not be assembled, documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package. The above actions will be coordinated by the LRC.
2. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.
3. The Readiness Review for Midway Valley activities will be submitted to the LRC by 05/15/91.
4. For those records that were submitted after the 10-day turnover requirement, no remedial actions can be taken.

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CAR NO. YM
DATE: 04-
SHEET: 2 OF 4

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-037 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 05/31/91)

1. QPs 5.1 and 5.3 will be revised to distribute Quality and Implementing Procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. The revisions will be completed by 05/31/91.
2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECO Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved: Bruce Gendelle For R.F.P. 4/12/91
Responsible Manager Date

ACCEPT RESPONSE: _____
QAR Date

ACCEPT RESPONSE: _____
OQA Date

This response was amended on AP 23, 91 4/24/91

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

CAR NO. YM-91-037
DATE: 04-23-91
SHEET: 1 OF 3

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-037

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

- A sample review of record packages was performed and determined that many record packages may be missing from the Local Record Center (LRC).
- For those record packages currently in the LRC, many were not submitted in accordance with the 10-day turnover requirement.

B. Root Cause:

Record Sources have not complied with the records requirements described in the governing procedures as evidenced by their failure to implement the classroom training and guidelines provided.

C. Remedial Actions: (All Actions To Be Completed By 10/15/91)

1. A review will be conducted to determine how many record packages should have been generated by Quality and Implementing Procedures. This review will be conducted by May 30, 1991 and will identify those packages (current revision level) which represent current activities.
2. Once a list of packages has been determined, a comparison will be made to those record packages contained in the records system. This review will be conducted by 6/15/91.
3. If packages for current activities are found missing, the Records source will be requested by 7/1/91 to obtain and transmit the required records to the LRC. If a complete records package can not be assembled, documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package. All activities associated with current activity packages will be completed by 8/1/91.

Let's dtd 4/23/91 - 580-01-377

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

CAR NO. YM-9.
DATE: 04-23-91
SHEET: 2 OF 3

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-037 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

C. Remedial Actions: (Continued)

4. For all other missing packages (not current activity), the Records Source will be requested by 8/1/91 to obtain and transmit the required records to the LRC if the missing information represents package data for an activity which will not be repeated or for procedures which will be used in the future. If a complete records package can not be assembled, documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package. All activities associated with ~~current~~ activity packages will be completed by 10/15/91.
these
(see letter, 4/26/91)
5. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.
6. The Readiness Review for Midway Valley activities will be submitted to the LRC by 05/15/91.
7. For those records that were submitted after the 10-day turnover requirement, no remedial actions can be taken.

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 05/31/91)

1. QPs 5.1 and 5.3 will be revised to distribute Quality and Implementing Procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. The revisions will be completed by 05/31/91.

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U.S. DEPARTMENT OF ENERGY
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CAR NO. YM-91-03,
DATE: 04-23-91
SHEET: 3 OF 3

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-037 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

D. Corrective Action to Prevent Recurrence: (Continued)

2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECO Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved: _____

127 Pritchett
Responsible Manager

4-23-91
Date

RESPONSE ACCEPTED: _____

David Lee
QAR

4-24-91
Date

RESPONSE ACCEPTED: _____

Catherine Hampton for
OQA

4-26-91
Date



Reynolds Electrical & Engineering Co., Inc.

Post Office Box 98521 • Las Vegas, NV 89193-8521

IN REPLY REFER TO:
580-01-383

APR 26 1991

WBS 1.2.9
QA

Donald G. Horton, Director
Quality Assurance Division
Yucca Mountain Site Characterization
Project Office
U.S. Department of Energy
Post Office Box 98608
Las Vegas, NV 89193-8608

CORRECTION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-91-037
RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT 91-02
OF REYNOLDS ELECTRICAL & ENGINEERING CO., INC. (REECO)

The purpose of this letter is to document a telephone conversation on April 25, 1991 between R. H. Klemens, SAIC Audit Team Leader, and W. J. Glasser, REECO/YMP QA Manager, concerning REECO's amended response to CAR YM-91-037. Mr. Klemens requested a clarification on wording for the last sentence of planned remedial action step C4. The clarification was discussed as follows:

Current: Remedial Actions section C4, last sentence - "All activities associated with current activity packages will be completed by 10/15/91"

Change to: Remedial Actions section C4, last sentence - "All activities associated with these activity packages will be completed by 10/15/91"

The affected word has been underlined. This clarification is needed to be consistent with the subject of section C4, "Other missing packages (not current activity)..."

Should you have any questions or require further information, please contact W. J. Glasser of my staff at 794-7562.


R. F. Pritchett, Manager
Yucca Mountain Project Division
YMP Technical Project Officer

RFP:WJG:dm

cy: See page 2

REECO
AN  **EG&G COMPANY**

D. G. Horton
580-01-383
Page 2

cy: Central Files THRU
Executive Office, M/S 555
W. J. White, DOE/NV, M/S 505
C. E. Hampton, DOE/YMP, M/S 523
N. J. Brogan, SAIC, M/S 517/T-08,
R. H. Klemens, SAIC, M/S 517





Reynolds Electrical & Engineering Co., Inc.

Post Office Box 98521 • Las Vegas, NV 89193-8521

IN REPLY REFER TO:

580-01-422

WBS 1.2.9
QA

MAY 14 1991

Donald G. Horton, Director
Quality Assurance Division
Yucca Mountain Site Characterization
Project Office
U.S. Department of Energy
Post Office Box 98608
Las Vegas, NV 89193-8608

QA RECEIVED

MAY 15 1991

REVISION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-91-037
RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT 91-02
OF REYNOLDS ELECTRICAL & ENGINEERING CO., INC. (REECO)

The subject amended response stated, for remedial action step 6, that REECO planned to submit the Readiness Review for Midway Valley activities by May 15, 1991. However, REECO has determined that the approved Job Package (JP) 91-1 has not been transmitted to REECO from the Field Operations Center. In addition, the Material Reporting & Handling Plan is presently at the Yucca Mountain Site Characterization Project Office for approval. Since the missing information is required to closeout the completed quality assurance records package, REECO is not required, by the current records management system, to submit the package to the Local Records Center (LRC) at this time.

REECO does not have control over release of all required package documentation. When the required information is completely assembled, the completed package will be closed out and the package submitted.

No further action regarding remedial action step 6 can be initiated by REECO at this time. Therefore, please revise the remedial action to read:

6. The Readiness Review for Midway Valley activities will be submitted to the LRC within 10 days after REECO receives all of the required package information and the package is closed out. The completed quality assurance records package is not required at this time.

REECO

AN  **EBC** COMPANY


Donald G. Horton
580-01-422
Page 2

Should you have any questions or require further information, please contact
W. J. Glasser of my staff at 794-7562.

127 Pritchett
R. F. Pritchett, Manager
Yucca Mountain Project Division
YMP Technical Project Officer

RFP:WJG:rm

cy: Central Files THRU
Executive Office, M/S 555
W. J. White, DOE/NV, M/S 505
C. E. Hampton, DOE/YMP, M/S 523
N. J. Brogan, SAIC, M/S 517/T-08
R. H. Klemens, SAIC, M/S 517



VERIFICATION OF CAR YM-91-037

Block 15 - Verification of Corrective Action

Remedial Action

Item 1 - Verified. Reviewed List of Procedure Record Packages, dated May 30, 1991

Item 2 - Verified. Reviewed Procedure and Activity Record Status, dated June 13, 1991

Item 3 - Verified. All activities associated with current activity packages completed by 10/15/91. Reviewed Activity Record Packages, dated Oct. 15, 1991

Item 4 - Verified. All activities associated with not-current activity packages completed by 10/15/91. Reviewed packages and Standards which were sent to the LRC.

Item 5 - Verified. Reviewed microfilm RE 010776, (submittal of 1990 Management Assessment to the LRC on 4/8/91).

Item 6 - Verified. Readiness Review for Midway Valley activities submitted to the LRC on 7/17/91. Checked microfilm RMS 11739.

Corrective Action

Item 1 - Verified. Reviewed revisions to procedures QP 5.1 and QP 5.3.

Item 2 - Verified. Reference Pritchett Memo dated 5/24/91 on Records Management Corrective Actions.

Item 3 - Verified. Reference record submittal computer programs, on-the-job training, and REECO Records Management Manual.

Robert H. Klemm 10/25/91

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RHK 3/12/91

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

14CAR NO.: YMP-91-038
DATE: 3/7/91
SHEET: 1 OF 2
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document QP 17.0		2 Related Report No. Audit 91-02	
3 Responsible Organization REECo		4 Discussed With C. Thompson/R. Pritchett/M. Fox	
10 Response Due 30 days after issue	11 Responsibility for Corrective Action R.F. Pritchett		12 Stop Work Order Y or N N
5 Requirement: <p>QP 17.0, Revision 4, Paragraph 6.1.3.1 states, "Documents designated as records shall be completed and processed in accordance with this procedure and the REECO/YMP approved Records Management procedure."</p> <p>IM-LRC-IP-01, Revision 0, Paragraph 6.1.1.12 and 6.1.1.12.1 state, "Prior to transmittal to the LRC, records shall be reviewed to ensure the record is complete and all of its attachments or enclosures are included."</p> <p>QAPP, Revision 8, Section XVII, Paragraph 1.1 states in part, "Quality Assurance Records include (1) individual documents that have been executed, completed, and approved and that furnish evidence of the...activities affecting quality; (2) documents prepared and maintained to demonstrate implementation of quality assurance programs. A completed record is a (Con't)</p>			
6 Adverse Condition: <p>Documents maintained as records are incomplete and do not contain all of the records generated by the implementation of the applicable procedures. Examples are:</p> <ol style="list-style-type: none">1. Management Assessment for year 1990: Completed checklists and Corrective Action Requests are missing (Reference QP 2.3, Revision 1, Paragraph 7.1)2. QP, IP, QS, Calibration, and Welding procedures: Document Review Record, Document Review Continuation Sheets, and Quality Procedure Change Notices are missing (Reference QP 5.1, Revision 2, Paragraph 7.1)			
7 Recommended Action(s): <p>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 of the CAR. (Con't)</p>			
8 Initiator Mario R. Diaz 2/28/91 <i>Mario Diaz</i>		9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: OQA <i>Catherine Humphrey</i> 3/11/91
15 Verification of Corrective Action: <p><i>Corrective Action Verification Statement Attached - RHK 10/25/91</i></p>			
16 Corrective Action Completed and Accepted: OAR <i>Robert H. Hemen</i> Date <u>10/25/91</u>		17 Closure Approved By: OQA <i>R. E. Spruce</i> <u>10/31/91</u>	

ENCLOSURE

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

RHK 2/12/91

CAR NO.: YM-91-038
DATE: 3/7/91
SHEET: 2 OF 2

**CORRECTIVE ACTION REQUEST
(continuation sheet)**

5 Requirements (continued)

document that will either receive no more entries or whose revision would normally consist of the reissue of the document; and is signed and dated by the originator and, as applicable, by personnel authorized to approve the document."

QP 2.3, Revision 1, paragraph 7.1 states, "The completed Management Assessment Report, Checklist, Memorandum, and Corrective Action Requests shall be considered QA Records, and shall be maintained in accordance with QP 17.0."

QP 5.1, Revision 2, paragraph 7.1 states, "Procedures and their revisions, Document Review Record, Document Review Record Continuation Sheets, and the Quality Procedure Change Notices, when applicable, generated by the implementation of this procedure are QA Records and shall be packaged together and processed in accordance with QP 17.0."

7 Recommended Action(s) (continued)

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

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

CAR NO. YM-91-038
DATE: 04-12-91
SHEET: 1 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-038

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

Based on a sample review, it appears that many of the record packages submitted may be deficient in their required documentation.

B. Root Cause:

Record Sources have not complied with the records requirements described in the governing procedures as evidenced by their failure to implement the classroom training and guidelines provided.

C. Remedial Actions: (All Actions To Be Completed By 10/15/91)

1. The submitted Record Packages will be examined by the Record Source and Local Records Center (LRC) Staff to determine what documents, as required by the governing procedure, were included in the packages. If documentation is missing, the Records Source will attempt to obtain and include it in the package. Otherwise documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package.
2. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 05/31/91)

1. QPs 5.1 and 5.3 will be revised to distribute procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. These revisions will be completed by 05/31/91.

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

CAR NO. YM-91-
DATE: 04-12-91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-038 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL (Continued)

D. Corrective Action to Prevent Recurrence: (Continued)

2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECO Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved: Bruce Hardell For RFP 4/12/91
Responsible Manager Date

RESPONSE ACCEPTED: Q * _____
QAR Date

RESPONSE ACCEPTED: _____
OQA Date

* This response was amended on AP 23, 91
4/24/91

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

CAR NO. YM-91-038
DATE: 04-23-91
SHEET: 1 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-038

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

Based on a sample review, it appears that many of the record packages submitted may be deficient in their required documentation.

B. Root Cause:

Record Sources have not complied with the records requirements described in the governing procedures as evidenced by their failure to implement the classroom training and guidelines provided.

C. Remedial Actions: (All Actions To Be Completed By 10/15/91)

1. Using the list of packages generated as part of the remedial actions for CAR-YM-91-037, item C 1, those packages which represent current activities which are currently in the LRC will be reviewed by Quality Assurance and the LRC staff to determine the completeness of the records submitted in accordance with the governing procedure. This review will be completed by 6/15/91.
2. If documentation is found missing for current activities, Quality Assurance will conduct an evaluation of the affect on quality of the missing documentation and included as part of the package by 7/1/91.
3. If the missing documentation is deemed to be critical to the satisfactory performance of quality affecting activities for the licensing of the repository, then the Records source will be requested to provide the missing information to the LRC no later than 8/1/91.
4. For all other packages which are not representative of current activities, the review for package completeness and affect on quality determination for missing documentation will be completed by 10/15/91.
5. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.

Ltr dtd 4/23/91 - 580-01-377

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

CAR NO. YM-91-038
DATE: 04-23-91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-038 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL (Continued)

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 05/31/91)

1. QPs 5.1 and 5.3 will be revised to distribute procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. These revisions will be completed by 05/31/91.
2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECO Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved: _____

127 Pritchett

Responsible Manager

4/23/91

Date

RESPONSE ACCEPTED: _____

David Lee
QAR

4/24/91

Date

RESPONSE ACCEPTED: _____

Catherine Hampton
QQA

4-26-91

Date

VERIFICATION OF CAR YM-91-038

Block 15 - Verification of Corrective Action

Remedial Action

Item 1 - Verified. Completeness review of List of Procedure Record Packages, dated May 30, 1991, was accomplished by 6/15/91.

Item 2 - Verified. Impact evaluation was not required. No missing documentation was identified.

Item 3 - Verified. Missing documentation was not critical to the satisfactory performance of quality affecting activities for the licensing of the repository.

Item 4 - Verified. Review completed on schedule (10/15/91).

Item 5 - Verified. The 1990 Management Assessment was submitted to the LRC on 4/8/91. Checked microfilm RMS# 010776.

Corrective Action

Item 1 - Verified. Reviewed revisions to procedures QP 5.1 and QP 5.3.

Item 2 - Verified. Reference Pritchett Memo dated 5/24/91 on Records Management Corrective Actions.

Item 3 - Verified. Reference record submittal computer programs, on-the-job training, and REECO Records Management Manual.

Robert H. Klemm 10/25/91