



Department of Energy
 Yucca Mountain Site Characterization
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WBS 1.2.9.3
 QA

NOV 22 1991

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EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-003 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-92-01 OF LOS ALAMOS NATIONAL LABORATORY

The YMQAD staff has evaluated the response to CAR YM-92-003. 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 John S. Martin at (702) 794-7881 or FTS 544-7881.

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-898

Enclosure:
 CAR YM-92-003

- cc w/encl:
- K. R. Hooks, NRC, Washington, DC
 - S. L. Bolivar, LANL, Los Alamos, NM
 - M. J. Clevenger, LANL, Los Alamos, NM
 - J. L. Day, LATA, Los Alamos, NM
 - S. W. Zimmerman, NWPO, Carson City, NV

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ADD: Ken Hooks
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Richard J. Herbst

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cc w/o encl:

J. B. Tillman, LAO

J. H. Hines, OQD, AL

A. R. Chernoff, MSD, AL

J. W. Gilray, NRC, Las Vegas, NV

N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08

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

14 CAR NO.: YM-92-003
DATE: 10/09/91
SHEET: 1 OF 1
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document TWS-QAS-QP-12.1, Rev. 4	2 Related Repor. No. Audit YMP-92-01
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3 Responsible Organization Los Alamos Nat'l. Lab.	4 Discussed With S. Bolivar
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10 Response Due 20 days from issue	11 Responsibility for Corrective Action R. Herbst	12 Stop Work Order Y or N No
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5 Requirement:
TWS-QS-QP-12.1, Rev. 4, Para. 6.3, states in part, "...Instruments are calibrated by LANL's Standards and Calibration Group, by a service organization or by the operator. Individuals who perform calibrations...use written procedures."

6 Adverse Condition:
Contrary to the above, the Laboratory has performed calibrations to memos/draft procedures.

DISCUSSION
Examples include use of Memo No. TWS-EES-13-11-90-002 to perform calibrations for standards nos. 4526, 4527, and 4528. In addition, the automated digital electron microscope (ADEM) No. PN 840982 was calibrated utilizing a draft procedure. (Reference draft TWS-EES-DP-129).

7 Recommended Action(s):

1. Correct the deficiencies identified.
2. Investigate to determine if there are other similar deficiencies.
3. Take action to preclude recurrence.

8 Initiator <u>J.S. Martin</u> <u>J.S. Martin</u>	Date: 10/4/91	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: <u>R.C. Spence</u>	Date: 10/15/91
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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.

CAR NO. _____
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CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE FOR CAR NO. YM-92-003:

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A. Extent of Deficiency:

The LANL YMP Quality Assurance Project Leader (QAPL) issued memo TWS-EES-13-10-91-047 requesting Principal Investigators (PIs) to determine if there are known instances not previous identified, where work is being conducted to draft procedures.

It has been determined that there are no other instances.

B. Root Cause:

For the first example cited, memo TWS-EES-13-11-90-002 was written to document how mass standard calibrations are conducted. It is not used to conduct the mass standard calibrations. The root cause of this condition is the calibration group's procedure is not adequate to meet LANL YMP requirements for calibrations.

The second example cites the automated electron microscope (ADEM) No. PN 840982 being calibrated to an "in-progress" procedure (TWS-EES-DP-129), this adverse condition was caused by the operator/calibrator's misunderstanding regarding proper procedure reference. The operator/calibrator made an incorrect entry of TWS-EES-DP-129 on the M&TE Calibration Record and consequently entered "in-progress" on "OPERATOR TO CALIBRATE" label found on the ADEM. The "in-progress" entry refers to DP-129, which currently is in review. The "OPERATOR TO CALIBRATE" label should have referenced the ADEM operator's manual directly. It was determined that there was no work done to the draft procedure and that the calibration was done according to the ADEM operator's manual.

C. Remedial Action:

Implementation of the remedial actions will be the responsibility of the LANL YMP QAPL. Scheduled completion date: February 28, 1992.

For the first example cited, procedure LANL-YMP-DP-609 is being written to document how mass standard calibrations are conducted.

For the second example cited, the operator/calibrator has replaced the "OPERATOR TO CALIBRATE" label with one referencing the ADEM operator's manual. The M&TE Calibration Record will be corrected to reference the ADEM operator's manual.

D. Corrective Action to Prevent Recurrence:

Implementation of the corrective action to prevent recurrence will be the responsibility of the LANL YMP QAPL. Scheduled completion date: February 28, 1992.

Sta dtd 11/8/91 - TWS-EES-13-11-91-032

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CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE FOR CAR NO. YM-92-003: (cont.)

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As a result of this CAR, the operator/calibrator now understands how to reference procedures on M&TE calibration records and labels.

Memo TWS-EES-13-10-91-047 has been distributed to all LANL YMP personnel. This memo instructed personnel to stop work on any work activity being conducted to draft procedures. The memo also states that LANL YMP personnel are NOT allowed to work to draft procedures. Therefore, mass standard calibrations will not be conducted until LANL-YMP-DP-609 is issued.

Response Approved	<u>SL Bolivar</u> LANL QAPL S.L. Bolivar	<u>11/8/91</u> DATE
Response Approved	<u>R. J. Herbst</u> LANL TPO R. J. Herbst	<u>11/8/91</u> DATE
Response Approved	<u>[Signature]</u> QAR	<u>11/18/91</u> DATE
Response Approved	<u>[Signature]</u> YMQAD	<u>11/21/91</u> DATE