



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 19 1991

Carl P. Gertz, Project Manager, YMP, NV

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-008 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-91-I-01 OF YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT OFFICE

The YMQAD staff has evaluated the response to CAR YM-92-008. The response has been determined to be unsatisfactory based on the following:

1. Remedial action to correct the identified condition is not addressed as required by Quality Assurance Administrative Procedure (AP) 16.1, Corrective Action, Revision 4, paragraph 6.1.7.
2. In recapitulation of this CAR, AP 5.32Q, Test Planning and Implementation Requirements, Revision 1, Step 18, requires, as part of the minimum information to be included in the test planning packages, "documentation of completion of prerequisites." Contrary to this requirement, test plans Technical Program Plan (TPP) 91-32 and TPP 91-34 are silent on prerequisites. Omission is clearly a deficiency, even if no prerequisites were specified by the Division Directors/Technical Project Officers, per Step 10 of AP 5.32Q, Revision 1. If prerequisites are not specified, the test plan must provide objective evidence of that fact.
3. With regard to Part 3 of the response, the revision of AP 5.32Q will be examined to determine whether the deficiency will recur.

An amended response is required to be submitted to this office within ten working days of the date of this letter. Please ensure that the amended response includes an estimated completion date for the remedial action. Send the original of your response to Nita Brogan, Science Applications

YMP-5

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PDR WASTE
WM-11 PDR

ADD: Ken Hooks Ltr. Encl.
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International Corporation, Las Vegas, Nevada. If an extension to the due date is necessary, it must be requested in writing with appropriate justification prior to that date.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Neil D. Cox at 794-7236.



Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-1346

Enclosure:
CAR YM-92-008

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
N. D. Cox, SAIC, Las Vegas, NV, 517/T-06
S. R. Dippner, SAIC, Las Vegas, NV, 517/T-08
S. D. Johnson, PSDO/REECo, Las Vegas, NV
W. A. Wilson, YMP, Mercury, NV, M/S 717
M. B. Blanchard, YMP, NV
W. R. Dixon, YMP, NV
J. R. Dyer, YMP, NV
V. F. Iorii, YMP, NV
E. H. Petrie, YMP, NV

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

14CAR NO.: YM-92-008
DATE: 11/6/91
SHEET: 1 OF 1
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document AP-5.32Q, Revision 1, ICN 1		2 Related Report No. Audit YMP-91-I-01	
3 Responsible Organization YMPO		4 Discussed With J. R. Dyer	
10 Response Due 20 days from issuance	11 Responsibility for Corrective Action C. P. Gertz	12 Stop Work Order Y or N No	
5 Requirement: AP-5.32Q, Revision 1, ICN 1, Section 5, Steps 10, 11, and 18e, requires that the DDs/TPOs provide documentation of prerequisites to the Project Engineer (PE), that the PE incorporate documentation of prerequisites into the test planning package, and that the PE compile the test planning package ... e. with documentation of completion of prerequisites.			
6 Adverse Condition: Test Planning Packages (TPPs) do not address prerequisites. Discussion: Neither TPP 91-32 nor TPP 91-34 specifically addresses prerequisites, and it is impossible to tell from the evidence whether prerequisites were incorporated or if any were received from the DDs/TPOs.			
7 Recommended Action(s): Correct the discrepancies identified; investigate to determine if similar discrepancies exist. Take action to resolve recurrence such as changing AP-5.32Q to require that prerequisites be identified specifically or a statement be made saying there were no prerequisites.			
8 Initiator <i>Neil D. Cox</i> , ATL Date: Neil D. Cox 10/29/91 <i>Neil D. Cox 10/29/91</i>	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: Date: OQA <i>James Blaylock</i> for RES <u>11/11/91</u>	
15 Verification of Corrective Action:			
16 Corrective Action Completed and Accepted: OAR _____ Date _____		17 Closure Approved By: OQA _____	

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CORRECTIVE ACTION REQUEST
(continuation sheet)

This CAR recommends 3 actions: 1. Correct discrepancies identified, 2. Investigate to determine if similar discrepancies exist, and 3. Take action to resolve recurrence such as changing AP 5.32Q.

The responses to these 3 recommendations are:

1. The lack of prerequisites in TPP 91-32 and TPP 91-34 is due to there being no TPP prerequisites. This has been confirmed by Forrest Peters and Marvin Saines respectively. A review of the documentation indicates that the procedure was followed, and since there were no prerequisites, there were no discrepancies.
2. Investigation of other TPP's, existing or in process - 90-1, 91-2, 92-01, and the yet to be numbered TPP for UZ-16, indicates that "prerequisite requirements" for the TPP's do not exist or are being considered. Prerequisites for the Job Packages themselves are handled under AP 5.21Q.
3. To better insure that all required activities are identified and accounted for, AP 5.32Q has been revised (Rev 2, ICN 1), approved by QA, and released.

Response Approved:

Andy D. Plase
Acting Division Director, RSED

12/4/91
Date

Response Accepted:

QAR

Date

Response Accepted:

OQA

Date

Ltr dtd 12/11/91 - RSED:G DR-1211
Response hand carried on 12/4/91