

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION

QUALITY ASSURANCE SURVEILLANCE REPORT OF

REVIEW OF COMMENT RESOLUTIONS ON TECHNICAL

ASSESSMENTS AND QUALITY PROCEDURES

SURVEILLANCE NUMBER YMP-SR-92-002

CONDUCTED JANUARY 8 THROUGH 22, 1992

ACTIVITIES SURVEILLED:

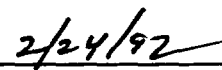
REVIEW COMMENT RECORDS FOR TECHNICAL ASSESSMENT REVIEWS;  
DOCUMENT REVIEW SHEETS FOR QUALITY MANAGEMENT PROCEDURES,  
ADMINISTRATIVE PROCEDURES, AND QUALITY ASSURANCE  
ADMINISTRATIVE PROCEDURES AND THEIR RESPECTIVE  
COMPLIANCE WITH QMP-02-08, QMP-06-04 AND QAAP 5.1

Prepared by:

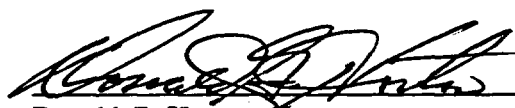


Robert H. Klemens  
Quality Assurance Engineer  
Surveillance Team Leader  
Yucca Mountain Quality Assurance Division

Date:

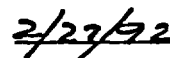


Approved by:



Donald G. Horton  
Director  
Office of Quality Assurance

Date:



## 1.0 EXECUTIVE SUMMARY

This report contains the results of the Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance (QA) Surveillance No. YMP-SR-92-002 of Review Comment Records (RCRs) for Technical Assessment Reviews (TARs) and quality records resulting from the review process for Quality Management Procedures (QMPs), Administrative Procedures (APs), and Quality Assurance Administrative Procedures (QAAPs). The Surveillance was conducted at the Yucca Mountain Site Characterization Project Office (YMPO) and at the offices of Technical and Management Support Services (T&MSS) contractor from January 8 through 22 of 1992. The Surveillance was conducted by a team from the Yucca Mountain Quality Assurance Division (YMQAD) of the Office of Quality Assurance (OQA) in accordance with requirements of the OCRWM QAAP 18.3, Revision 3, " Surveillance Program."

The surveillance of the TAR RCRs and procedure review process documents was conducted to verify compliance to pertinent implementing procedures and to determine if approved Yucca Mountain Site Characterization Project (YMP) comments are being included in the revised review documents. Sources of RCRs and DRs were the Local Records Center (LRC), Plans and Services Division, Regulatory Interactions Department and the Quality Records Center (QRC) located at the OCRWM Headquarters in Washington, D.C.

There were no deficiency documents generated as a result of this surveillance. Recommendations are included in Section 6 of the report.

## 2.0 SCOPE

The surveillance was originally intended to review and examine the Comment Report Forms from TAR Nos. YMP/90-2 and YMP/89-3. The Comment Report Forms were to be checked for correctness and follow-through of comment resolutions. The scope was later broadened to include the review process applied to QAAP, QMP and AP procedure reviews. The records were examined for correctness and follow-through.

## 3.0 SURVEILLANCE TEAM

The surveillance team consisted of the following personnel:

Robert H. Klemens, Surveillance Team Leader, Quality Assurance Engineer, Science Applications International Corporation (SAIC)\YMQAD, Las Vegas, Nevada

Thomas J. Higgins, Surveillance Team Member, Quality Assurance Scientist, SAIC/YMQAD, Las Vegas, Nevada

#### 4.0 PERSONNEL CONTACTED DURING THE SURVEILLANCE

The following personnel were contacted during the course of the surveillance:

R. V. Barton, DOE/YMPO, Deputy Project Manager  
J. R. Dyer, DOE/YMPO, Director, RSED  
V. A. Ford, SAIC/T&MSS, Document and Records Control Division  
K. M. Jerome, SAIC/T&MSS, Records Analyst I  
P. Mairose, Integrated Resource Group, Document Coordinator  
V. J. Neal, SAIC/T&MSS, Records Analyst  
C. Nye, CER Corporation, QRC Records Supervisor  
C. G. Phlum, SAIC/T&MSS, Manager, Regulatory Interactions Department  
W. C. Smith, Reynolds Electrical and Engineering Company, Inc. (REECo), Manager,  
YMPO LRC  
E. L. Spangler, SAIC/T&MSS, Plans & Procedures  
D. A. Thomure, REECo, Records Management Supervisor

#### 5.0 SURVEILLANCE RESULTS

##### 1. QMP-02-08, Technical Assessment Review

Evaluated TAR activities to determine the degree of compliance to QMP-02-08, Revision 0, ICN No. 2. The following TARs were reviewed:

- \* TAR No. YMP/90-2, "Geologic and Geographic Evidence Pertaining to Structural Geology in the Vicinity of the Proposed Exploratory Shaft, Yucca Mountain, Nevada"
- \* TAR No. MP/89-3, "ESF Title I Design Acceptability Analysis and Comparative Evaluation of Alternative ESF Locations"

The RCRs for the above TARs could not be located in the YMPO LRC or Central Records Facility files, but upon further investigation, most of the records were found in the Regulatory Interactions Department, where they were left by the last TAR secretary prior to his departure. A record package segment (RPS) to YMP/90-2, (RPS No. 0039), was also found in the Segment Vault of the YMPO LRC. The RPS had been examined by the YMPO LRC and contained numerous notes, indicating poor copies. The segment was retrieved by the Regulatory Interactions Department so that corrective action could be taken prior to resubmission.

All of the RCRs for YMP/90-2 were examined, (26 pages), and were found to be in compliance with QMP-02-08, with the exception of several editorial comments which were passed on to the Department Manager.

A total of 41 pages of comments were issued on YMP/89-3, but only about half of the comments (21 pages) have been resolved to date. The 21 pages of RCRs were examined and found to be in compliance with QMP-02-08.

A total of 42 pages of RCRs from three reviewers who participated in the TARs for Waste Package Design Requirements and Review Notice were examined and found to be in compliance with QMP-02-08.

2. QMP-06-04, "Review Process for Existing Procedures"

The focus of this portion of the surveillance was the review process used prior to issuance of the existing QMPs and APQs. Emphasis was given to the review of QMPs.

The surveillance team examined those quality records resulting from the review process specified in QMP-06-04, "Project Office Document Development, Review, Approval, and Revision Processes." Although QMP-06-04, Revision 4, is currently in force, only one current QMP was reviewed to this revision. Consequently the surveillance scope was expanded to all revisions of this procedure.

The attributes of the review process that were examined were:

1. Process initiation
  - a. appropriate management authorization
  - b. specification of review type
  - c. transmittal of appropriate review criteria
  - d. designation of reviewers
  - e. specification of approval authority
2. Review process
  - a. appointment of primary reviewer
  - b. appointment of delegated reviewer
  - c. certification of delegated reviewer qualification
  - d. transmittal of review criteria
  - e. specification of review type
  - f. review comments by appointed reviewer
  - g. response by author
  - h. acceptance of response by reviewer
  - i. management resolution of review comment disputes
  - j. final sign off by reviewer
3. Process conclusion
  - a. specified approval authority signature(s)
  - b. assembly of the record package

The following are the procedures for which records were examined:

<u>Procedure - Revision</u>	<u>Approval Date</u>	<u>Reviewed per QMP-06-04, Revision</u>
QMP-01-02 1	10/04/90	0
QMP-02-09 1	10/10/90	0
QMP-07-04 1	10/19/90	1
QMP-17-01 3	03/20/91	2
QMP-04-02 0, ICN 1	06/20/91	3
QMP-03-09 3	06/27/91	3
QMP-02-01 4	09/20/91	3
QMP-06-04 4	10/28/91	3
QMP-01-01 3	12/11/91	4
AP-3.3Q 4	06/26/91	3
AP-3.3Q 4, ICN 1	10/24/91	3
AP-5.21Q 3	08/03/91	3

The records for each of the reviews listed above were found to meet all of the attributes listed. The records examined were copies maintained by E. Spangler. This approach was necessary since the DRSs have not been treated as quality records since October 17, 1990, but are maintained by the YMP Project Control Branch as currently stated in Section 8.0 of the procedure.

The surveillance verified that the completed record packages are being submitted to the Record Management System by examining the microfilm at the LRC. The following three packages were retrieved:

<u>Procedure Review Package</u>	<u>Microfilm Reel No.</u>	<u>First Frame Number</u>
QMP-02-01, Rev. 4	9097700	2636
QMP-02-09, Rev. 1	9096300	1103
QMP-03-09, Rev. 3	9095500	2174

### 3. QAAP-5.1

A total of 41 pages of YMPO DRRs of QAAPs were examined for completeness and compliance with QAAP-5.1, Revision 3. The QAAP records were not available at the YMPO and had to be faxed from Headquarters QRC via the CER Corporation. DRRs were examined for the following QAAPs:

QAAP 2.6	QAAP 18.1
QAAP 2.7	QAAP 18.2
QAAP 16.1	QAAP 18.3

The DRRs were found to be in compliance with QAAP 5.1. Incorporation of approved YMP comments into the reviewed documents was verified. Explanations were provided for disapproved comments.

## 6.0 RECOMMENDATIONS

There are no deficiency documents generated as a result of this surveillance; however, there are two recommendations concerning the TAR procedure, QMP-02-08.

1. Revise QMP-02-08, Revision 0, to include a requirement that the Technical Assessment Review Process be tracked on the YMPO Action Tracking System, from its initiation through full completion, including submittal of all quality records to the Records Management System. In the interim, it is recommended that TARs YMP/89-3 and YMP/90-2 be tracked on the YMPO Action Tracking System, to keep management informed of the status of these seriously delinquent technical assessment reviews.
2. It is recommended that QMP-02-08 be revised to require the YMPO Branch Chief, or designee, to name a replacement TAR Chairperson when the original TAR Chairperson leaves the company or is reassigned while the TAR is in process. Also, the TAR Secretary should be replaced if he leaves the job prior to completion of the review process and submission of the QA Records package.

As this report is being issued, several important steps are being taken which will help to rectify the inconsistencies observed during this surveillance. These steps are as follows:

1. DOE Letter, RSED:JRD-1717, dated January 30, 1992, appointed P. Mairose as Document Coordinator, responsible for coordinating closure of the two outstanding TARS YMP/89-3 and YMP/90-02, and submitting Quality Records Packages to the LRC.
2. The addition of TARs YMP/89-03 and YMP-90-02 to the YMPO Action Tracking System (no. NN1-1992-0286) by J. R. Dyer. The TARs are scheduled for completion by August 31, 1992.
3. D. E. Livingston, YMPO Technical Analysis Branch, has been appointed as the YMPO Coordinator of TARs YMP/89-03 and YMP/90-02.
4. Document Action Request (DAR) 531, which was issued on February 10, 1992 to request a revision to QMP-02-08, is being withdrawn due to conflict with an earlier proposed revision to QMP-02-08, (DAR 497), which is about to be distributed to reviewers. The changes recommended to QMP-02-08 will be submitted under DAR 497. The resultant revision to QMP-02-08 is expected to issued no later than March 3, 1992.