



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-92-009 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-92-009. The response has been determined to be satisfactory. However, please be advised that the statement in paragraph 1.a. stating "that remedial action was not required," is incorrect. A deficiency may be corrected during an audit if only remedial action is required. In this case, root cause determination and revision of Administrative Procedure 6.17Q are necessary as well. The revision to the Assessment Team Controlled List, Revision 14, dated October 31, 1991, is considered to be adequate remedial action.

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 Brogan, Science Applications International Corporation, Las Vegas, Nevada.

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-1340

Enclosure:  
CAR YM-92-009

9112270181 911219  
PDR WASTE PDR  
WM-11  
YMP-5 250041

ADD: Ken Hooks

Gr. Encl.

102.7  
WM-11  
N403

Carl P. Gertz

-2-

DEC 19 1991

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

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

14CAR NO.: YM-92-009  
DATE: 11/6/91  
SHEET: 1 OF 2  
QA  
WBS No.: 1.2.9.3

**CORRECTIVE ACTION REQUEST**

1 Controlling Document AP-6.17Q, Revision 0, ICNs 1 & 2, Para. 5.2.2, Item 2	2 Related Report No. Audit YMP-91-I-01
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3 Responsible Organization YMFO	4 Discussed With J. Waddell, R. Barton
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10 Response Due 20 days from issuance	11 Responsibility for Corrective Action C. P. Gertz	12 Stop Work Order Y or N No
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5 Requirement:

Para. 5.2.2 ...the AT Manager shall assure that all documents (including subsequent versions of the WBS Dictionary) entered on the AT (Assessment Team) Controlled List, meet the following criteria:....2. They are the most current available version.

6 Adverse Condition:

The Assessment Team (AT) Controlled List does not include the most current available version of the WBS Dictionary.

Discussion:

- a. AT controlled List, YMP/90-44, Revision 12, dated 8/30/91, lists a WBS Dictionary, YMP/CC-0001, dated 7/19/91 while the document Control Center contains a WBS Dictionary dated 10/9/91. This is a recurring problem. The same deficiency was found during the Corrective Action Review I-02, June 11-15, 1990, and Internal Audit 90-I-01, October 22-26, 1990. Although these deficiencies were remedied during the respective audits, actions to prevent recurrence, if any, have been ineffective.
- b. The audit team recognizes that a proposed procedure revision was being processed prior to the

7 Recommended Action(s):

1) Correct the deficiency identified, 2) determine the root cause of this deficiency, and 3) develop corrective actions to prevent its recurrence.

8 Initiator <i>ATM</i> Neil D. Cox 10/28/91 <i>Neil D. Cox 10/28/91</i>	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: <i>James B. [Signature]</i> Date: 11/14/91
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15 Verification of Corrective Action:

16 Corrective Action Completed and Accepted: OAR _____ Date _____	17 Closure Approved By: OQA _____
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**ENCLOSURE**

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WASHINGTON, D.C.**

CAR NO.: YM-92-009  
DATE: 11/6/91  
SHEET: 2 OF 2

**CORRECTIVE ACTION REQUEST  
(continuation sheet)**

**6 Adverse Condition (continued)**

audit that should clarify the intent of the procedure, and that during the audit a new notice was added to the AT Controlled List (see Attachment 1).

ASSESSMENT TEAM CONTROLLED LIST, REV. 14, 10/31/91

The Assessment Team Controlled List identifies reference documents to be used in the implementation of AP-6.17Q to identify the scope and importance of items and activities within the Yucca Mountain Project. These documents are called "bases documents" in the procedure (AP-6.17Q, Section 5.2). Two categories of information are included in the AT Controlled List:

- I. Documents Defining Items and Scope of Activities
- II. Documents Defining Analysis Methods and Data for Evaluation of Importance

The Assessment Team Manager may also add documents as necessary to support detailed evaluations by the Assessment Teams. The revision or replacement of documents on the AT Controlled List will trigger a review by the Assessment Team Leaders of such changes to determine whether the Project Q-List, Quality Activity List, and Project Requirements Lists must be revised to reflect the changes in the bases documentation. The appendix of this controlled list contains the analyses of changes resulting from this review.

Assessment Team Manager

John D Waddell  
Signature

31-Oct-1991  
Date

**NOTICE:** This list is prepared for use by the Assessment Teams. Only the most current revisions of these documents available from the document control centers should be used by Assessment Team members. The documents were the most current available versions when the ATCL was prepared. Any discrepancies should be brought to the attention of the Assessment Team Manager. Revisions to this list are made only after the AT Manager has evaluated the changes to the documents.

↙ New notice

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CAR NO. YM-92-009  
DATE: 12/12/91  
PAGE: 1 OF 2  
QA

CORRECTIVE ACTION REQUEST (Continuation Page)

1. Corrective Action Response for CAR YM-92-009

a. Remedial Action:

It was determined that remedial action was not required for the specific deficiency because the intent of the procedure was met. The corrective actions identified below will preclude recurrence. This determination was completed by John Waddell on November 7, 1991.

b. Investigative Action:

The extent of this deficiency is limited to that described in CAR YM-92-009. A review of available documentation was completed by John Waddell on December 4, 1991, and is summarized below. The objective evidence provided by the auditor indicated that Revision 12 of the ATCL, dated August 30, 1991, lists the July 19, 1991, WBS. That was the version AVAILABLE from document control on August 30, 1991. He also indicates that when he checked the document control center, an October 9, 1991, version of the WBS dictionary was available. This is correct and the version he found was included in the ATCL, Revision 13, dated October 29, 1991.

c. Root Cause Determination:

The CAR is against paragraph 5.2.2 which states "... the AT Manager shall assure that all documents (including subsequent versions of the WBS Dictionary) entered on the AT (Assessment Team) Controlled List meet the following criteria: ... 2. They are the most current available versions." The evidence indicates that the root cause is a failure to clarify the intent of the procedure and not a failure to comply with the intent of the procedure. The need to clarify this section was identified in a prior audit, and a procedure revision to provide clarification is now in draft. Earlier revisions to the procedures were deferred after discussions among DOE staff, the QA Manager, and the TPOs resulted in an agreement to hold all individual changes and not to change this procedure piecemeal.

Although the auditor is correct that the statement can be interpreted at least two ways, the YMPO is in compliance with the intent of the statement. While the lists have not been revised IMMEDIATELY upon notification of each change of the WBS, the lists have been revised prior to each evaluation assigned to the Assessment Team to assure that the documents ENTERED on the list are the most current available for use in the analysis, i.e., the list is current at time of issue and use. This root cause analysis was completed by John Waddell on December 6, 1991.

*Ltr. dtd 12/12/91 - YM-RUB-1254*

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WASHINGTON, D.C.

CAR NO. YM-92-009

DATE: 12/12/91

PAGE: 2 OF 2  
QA

CORRECTIVE ACTION REQUEST (Continuation Page)

d. Corrective Action to Preclude Recurrence:

- (1) Include specific statements in the revision of AP 6.17Q to clarify the timing of changes, and assure that the statements do not imply requirements for instantaneous change. This action has been assigned to Durward Hulbert, who is the subject matter expert for the revision, and will be completed by January 31, 1992.
- (2) Add a notice to the AT Controlled List to emphasize that only most current available information is to be used by the Assessment Team. This action is complete and was accomplished by John Waddell on November 7, 1991.

2. Response Approved:

*Robert W. Burton*

12/12/91  
Date

Response Accepted:

*Neil D. Fox*  
QAR

12/16/91  
Date

Response Accepted:

*W.C. Spruce*  
OQA

12/18/91  
Date

YMP-063-RO  
10/15/91

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT  
PROCEDURE COMPLIANCE DOCUMENTATION FORM

I have read, and understood and complied with Document QAAP 16.1, Rev 3 ICN# \_\_\_\_\_  
in accomplishing my responsibilities in this procedure.

Signature Neil D. Cox Name (Printed) NEIL D. COX

Title QA ENGINEER Date 11/12/91

I have read, and understood and complied with Document QAAP 16.1, Rev 3<sup>\*</sup> ICN# NA  
in accomplishing my responsibilities in this procedure. *dealing with CAR YM-92-009*  
*\* Rev 4 of QAAP 16.1 is effective today (11/12/91) BUT WAS NOT used. This CAR was started*  
*using Rev 3.*  
Signature R. E. Lowe Name (Printed) R. E. Lowe

Title QA ENGR III, AUDIT TEAM LEADER Date 11/12/91

I have read, and understood and complied with Document QAAP 16.1, Rev 3 ICN# \_\_\_\_\_  
in accomplishing my responsibilities in this procedure.

Signature James Blaylock Name (Printed) JAMES BLAYLOCK

Title GEN ENG Date 11/14/91

I have read, and understood and complied with Document QAAP 16.1, Rev 4 ICN# \_\_\_\_\_  
in accomplishing my responsibilities in this procedure.

Signature Neil D. Cox Name (Printed) NEIL D. COX

Title QA Representative (Engr. III) Date 12/14/91

I have read, and understood and complied with Document QAAP 16.1, Rev 4 ICN# N/A  
in accomplishing my responsibilities in this procedure.

Signature R. E. Spence Name (Printed) Richard E. Spence

Title Director YMQAD Date 12/18/91

I have read, and understood and complied with Document \_\_\_\_\_, Rev \_\_\_\_\_ ICN# \_\_\_\_\_  
in accomplishing my responsibilities in this procedure.

Signature \_\_\_\_\_ Name (Printed) \_\_\_\_\_

Title \_\_\_\_\_ Date \_\_\_\_\_