



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

WBS 1.2.9.3

JUN 04 1992

Carl P. Gertz, Project Manager, YMP, NV

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-027 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-92-12

The YMQAD staff has evaluated the response to CAR YM-92-027. 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 794-7945 or Gerard Heaney at 794-7826.

Robert B. Constable for.

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-3730

Enclosure:
 CAR YM-92-027

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
- B. J. Verna, SAIC, Las Vegas, NV

cc w/o encl:

- J. W. Gilray, NRC, Las Vegas, NV
- N. J. Brogan, SAIC, Las Vegas, NV, 517/T-12

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 PDR WASTE PDR
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ADD: Ken Hooks
 Ltr. Encl.
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**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

8 CAR NO.: YM-92-027
DATE: 4/3/92
SHEET: 1 OF 1
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document AP-1.10Q, Revision 4	2 Related Report No. Audit YMP-92-12
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3 Responsible Organization YMP	4 Discussed With Richard Crawley
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5 Requirement:
AP-1.10Q "Preparation, Review, and Approval of SCP Study Plans" Rev. 4, Para. 5.0, Step 3, states, "Prepare draft SP in accordance with the following guidance: a. SPs should conform to the level of detail, format, and content specified in the May 7 and 8, 1986, DOE/NRC agreement (Attachment 2) to the extent practical." Attachment 2, Step 3, "Description of Test and Analyses", states in part, "Reference the technical procedures that will be followed during the test. Reference the specific QA requirements that will be applied to the test."

6 Adverse Condition:
Contrary to the stated requirements, the Los Alamos Study plan for Biological Sorption and Transport does not reference the specific technical procedures used in the task, although, several procedures with specific procedure nos. and titles have been approved. In addition, several study plans reviewed during the audit contain references to QA procedures which have been superseded.

9 Does a significant condition adverse to quality exist? Yes ___ No <u>X</u> If Yes, Circle One: A B C	10 Does a stop work condition exist? Yes ___ No <u>X</u> ; if Yes - Attach copy of SWO If Yes, Circle One: A B C D	11 Response Due Date: 15 Days from date of transmittal letter.
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12 Required Actions: Remedial Extent of Deficiency Preclude Recurrence Root Cause Determination

13 Recommended Actions:
Require Los Alamos to perform a review of all study plans to assess which study plans require revision to update the listing of technical and QA procedures.

Require all participants to perform a similar review as this deficiency is considered a generic Project concern.

7 Initiator <i>[Signature]</i> Date <u>4/9/92</u>	14 Issuance Approved by: QADD <i>[Signature]</i> for Date <u>4/9/92</u>
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15 Response Accepted QAR <i>[Signature]</i> Date <u>6-1-92</u>	16 Response Accepted QADD <i>[Signature]</i> for Date <u>6/3/92</u>
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17 Amended Response Accepted QAR Date	18 Amended Response Accepted QADD Date
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19 Corrective Actions Verified QAR Date	20 Closure Approved by: QADD Date
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CAR NO. YM-92-027
DATE: 5/28/92
PAGE: 1 OF 2
QA

CORRECTIVE ACTION REQUEST (Continuation Page)

1. Corrective Action Response for CAR No. YM-92-27

- A. Remedial Action - The Los Alamos National Laboratories (LANL) Principal Investigator (PI) for Study Plan 8.3.1.3.4.2 "Biological Sorption and Transport" has agreed to provide presently available specific numbers and titles for the technical procedures that will be used for each activity in this study. These procedures will be referenced in the study plan before it is approved by the Yucca Mountain Site Characterization Project Office (YMPO) under Administrative Procedure (AP) 1.10Q.
- B. Investigative Action - This condition has been discussed with the responsible PI at LANL. Other cognizant personnel of the participating organizations responsible for preparing study plans also have been, or will be, contacted to determine the extent of this condition. In general, technical procedures are referenced in study plans to provide substantial compliance with the DOE/NRC Level of Detail Agreement (LODA) when the study plans are submitted to the YMPO for review and approval. For Study Plan 8.3.1.3.4.2, the references had not been updated although a new procedure became available during the AP-1.10Q review process that leads to YMPO approval of study plans.

There is no requirement in the QARD for a scientific investigation planning document to contain a list of references. The requirement is derived from a DOE/NRC agreement, as discussed in Section D. The requirement in AP-1.10Q is derived from this agreement. However, there is no requirement in AP-1.10Q or in the DOE/NRC LODA that study plans must be revised to update referenced procedures as they become available, or as new ones may be added for a particular activity.

- C. Root Cause Determination - DOE agreed to reference technical procedures to be used in study plans to provide additional detailed information to NRC for technical review of study activities. Non-standard procedures are to be distinguished from standard procedures. Non-standard procedures are to be available to NRC 60 days before the start of work. Standard procedures could be used immediately upon approval of the procedure by the participating organization. By agreement, technical procedures are not transmitted routinely to NRC. NRC is to make verbal requests for specific non-standard procedures it wishes to review during the 60 day period before work starts. The YMPO believes that revising study plans as technical procedures become available would be an inefficient process to keep the NRC informed.

Ltd dtd 5/29/92 - RSED:RAC-3635

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CAR NO. YM-92-027
DATE: 5/28/92
PAGE: 2 OF 2
QA

CORRECTIVE ACTION REQUEST (Continuation Page)

-2-

- D. Corrective Action to Preclude Recurrence - First, all study plans that are nearing AP-1.10Q approval will be screened to assure that the technical procedure references are current.

Second, the RSED will renegotiate, through FW-30, the LODA that was obtained at the DOE/NRC May 7 and 8, 1986 meeting. Because the LODA is now six years old, the YMPO plans to renegotiate many aspects of the agreement to the mutual benefit of both parties. Since there is no requirement in the QARD to reference technical procedures in scientific investigation planning documents, this requirement should be deleted from the LODA. Our present schedule is to hold the first DOE/NRC management meeting July 23, 1992, and finalize a new DOE/NRC agreement on study plans by October 30, 1992.

Third, YMPO is proposing that NRC request copies of participant technical procedures through the NRC on-site representative (OR). A current list of technical procedures for each study plan, which would be updated by the PI as new procedures to be used are approved, would be sent to YMPO for transmittal to the OR. This would allow the OR to obtain current versions of all available technical procedures for any study plan when requested by NRC staff for reviews of study plans, reviews of non-standard technical procedures, or any other purpose.

Fourth, the appropriate revision of AP-1.10Q will be developed to comply with the renegotiated DOE/NRC LODA agreement and with the QARD.

2. Individuals responsible for each action listed above (A-D) and anticipated completion dates:

- A. Richard A. Crawley - June 15, 1992.
B. Richard A. Crawley - June 15, 1992.
C. Richard A. Crawley - Completed.
D. Thomas W. Bjerstedt, Richard A. Crawley -
October 30, 1992

3. Response Approved:


Responsible Manager

Date:

5/29/92