



Department of Energy
Yucca Mountain Site Characterization
Project Office
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Las Vegas, NV 89193-8608

WBS 1.2.9.3

MAY 05 1992

Richard L. Bullock
Technical Project Officer
for Yucca Mountain
Site Characterization Project
Raytheon Services Nevada
101 Convention Center Drive
Phase II, Suite P-250
Las Vegas, NV 89109

EVALUATION OF RESPONSES TO CORRECTIVE ACTION REQUESTS (CARS) YM-92-025 AND
YM-92-026 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD)
AUDIT YMP-92-11 OF RAYTHEON SERVICES NEVADA

The YMQAD staff has evaluated the responses to CARS YM-92-025 and YM-92-026. The responses have been determined to be satisfactory. Verification of completion of the corrective actions will be performed after the effective dates provided. Any extension to these dates must be requested in writing, with appropriate justification, prior to the dates. 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 Robert B. Constable at 794-7945 or Mario R. Diaz at 794-7974.

R. E. Spence

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-3171

Enclosure:
CARS YM-92-025 and YM-92-026

cc w/encl:
K. R. Hooks, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
M. J. Regenda, RSN, 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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9205130297 920505
PDR WASTE
WM-11 PDR

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-92-025
DATE: 03/13/92
SHEET: 1 OF 2
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document PP-02-01, Rev. 0; PP-02-02, Rev. 0; PP-02-08, Rev. 0		2 Related Report No. Audit YMP-92-11	
3 Responsible Organization RSN		4 Discussed With M. Regenda/J. Rue	
5 Requirement: PP-02-02, Rev. 0, Paragraph 6.1 states in part "Position Descriptions - Human Resources shall, with assistance from the supervisors and/or managers, develop position descriptions for all personnel who perform quality affecting activities". Paragraph 6.2 states in part "Personnel Qualification Evaluation - The Manager, Human Resources shall verify the education and experience of employees prior to their performing quality affecting activities. Attachment 1 will be used to certify that this verification has been completed. Each manager or supervisor shall compare the education and experience of the employee against the education and background experience requirements established for the position. The managers or supervisors will certify that requirements have been met in the format specified in Attachment 1."			
6 Adverse Condition: Documented evidence of some elements of indoctrination and training required by implementing procedures are missing in the record files. The record files of the following personnel did not contain documented evidence of one or more of the requirements described in block 5 above: J. McNeely R. Strote D. Anderson C. Herrington C. Clark E. Wasson J. Hansen All of these personnel have been authorized to perform quality affecting work prior to March 3, 1992.			
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: 20 days after issue			
12 Required Actions: <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Extent of Deficiency <input checked="" type="checkbox"/> Preclude Recurrence <input checked="" type="checkbox"/> Root Cause Determination			
13 Recommended Actions: Identify the remedial action to be taken to correct the deficiency noted in block 6. Identify the cause of the condition and the planned corrective action to prevent recurrence.			
7 Initiator M. Diaz <i>Mario Diaz</i> Date <u>3-13-92</u>		14 Issuance Approved by: QADD <i>R.C. Spence</i> Date <u>3/16/92</u>	
15 Response Accepted QAR <i>Mario Diaz</i> Date <u>4-16-92</u>		16 Response Accepted QADD <i>R.C. Spence</i> Date <u>5/4/92</u>	
17 Amended Response Accepted QAR Date		18 Amended Response Accepted QADD Date	
19 Corrective Actions Verified QAR Date		20 Closure Approved by: QADD Date	

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CORRECTIVE ACTION REQUEST (Continuation Page)

5 Requirements (continued)

PP-02-01, Rev. 0, Paragraph 6.1.2, states in part "Prior to performing any quality affecting activity, the employee shall be indoctrinated as a minimum to the following:

- o Project level plans
- o Job responsibilities and authority
- o The Quality Assurance Requirements Document (QARD)"

PP-02-08, Rev. 0, Paragraphs 6.11.1, 6.11.2, and 6.11.2.13 state in part "Current certification records of Level II, and Level III employees shall be maintained by the examiner. The certification shall include as a minimum ... Training Records."

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CORRECTIVE ACTION REQUEST (Continuation Page)

5 Requirements (continued)

PP-02-01, Rev. 0, Paragraph 6.1.2, states in part "Prior to performing any quality affecting activity, the employee shall be indoctrinated as a minimum to the following:

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RSN Response: Reference discrepancy to PP-02-02, Rev. 0

Remedial Action - Job Descriptions (JD) and Personnel Qualification Evaluations (PQE) will be obtained for personnel without this documentation in their files.

Extent of Deficiency - Individuals that are lacking JDs and PQEs have been identified, RSN/YMP Management is in the process of developing YMP oriented JDs, and RSN Human Resources is verifying the education and experience of these individuals working on the YMP.

Preclude Recurrence - This is a one time occurrence and prior to start of work on the YMP, each individual will have a JD and PQE in place.

Root Cause Determination - JDs and PQEs were not developed for the YMP project matrix personnel because they were overlooked when these documents were developed for assigned project personnel.

Reference discrepancy to PP-02-01, Rev. 0

Remedial Action - The requirements for indoctrination to the Project Level Plans and the Quality Assurance Requirements Document (QARD) do not relate to the work to be accomplished by RSN. The RSN personnel accomplish their work to the RSN Quality Assurance Program Description (QAPD). Procedure Interim Change 3 to Project Procedure PP-02-01, Revision 0, deleting these items was issued and became effective on March 5, 1992. There will be no further action taken regarding this matter. Job responsibility and authority indoctrination will be included in the files for all personnel working on the YMP for which this is a requirement.

Extent of Deficiency - All personnel required to have this indoctrination did not have documentation in their files.

Preclude Recurrence - The Managers are being made aware that the documentation of an indoctrination on job responsibilities and authority is part of the training and indoctrination process.

Root Cause Determination - The requirement for documentation of an indoctrination on job responsibilities and authority was not implemented properly after being entered into the procedure.

std del 4/10/92 - RSN - YMP - 1327

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CORRECTIVE ACTION REQUEST (Continuation Page)

Reference discrepancy to PP-02-08, Rev. 0

Remedial Action - The procedure will be revised to delete the requirement for the examiner to maintain training records. The training records are maintained by the RSN YMP Project Office.

Extent of Deficiency - There has been only one (1) person involved in this activity.

Preclude Recurrence - The procedure will be revised.

Root Cause Determination - The requirement for the examiner to maintain training records was overlooked at the time the certification was being done.

Estimate Completion Date: 06/12/92

Responsible Individual: R. L. Schreiner

R. L. Schreiner
Manager, Systems Engineering

Response Approval: M. Wilson

Date: 4-10-92

for R. h. Bullock

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8 CAR NO.: YM-92-026
DATE: 03/13/92
SHEET: 1 OF 2
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document PP-02-04, Rev. 0	2 Related Report No. Audit YMP-92-11
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3 Responsible Organization RSN	4 Discussed With R. Schreiner/R. Deklever
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5 Requirement:

PP-02-04, Rev. 0, Paragraph 6.3.1.b, states in part "The Board Chairperson establishes minimum qualifications (e.g. education, experience and independence) needed by the Review Board and Team Review members."

Paragraph 6.3.1.f, states that "The Board Chairperson conducts training for assigned board members and team members to this procedure and other applicable documents in accordance with PP-02-01."

PP-02-01, Rev. 0, Paragraph 6.2.2.1, states that " The Qualified Instructor/Trainer shall develop a lesson plan or outline identifying the subject matter to be covered in the training. As a minimum, the lesson plan or outline shall include the title, content, length, objectives, methods, activities and materials for the instruction. It may include such things as prerequisites, target population, and the method for evaluation of its effectiveness. It shall

6 Adverse Condition:

Readiness Review for ESF Title II Design Activities was performed and documented without being in compliance with some of the procedural requirements.

Based on the requirements shown in block 5 above, the following discrepancies were found during the audit:

- a. R. Deklever was part of the Team Review Board. However, minimum qualifications for his participation were not established.
- b. Training of Board Members and Team Members was not performed by the Board Chairperson.
- c. A lesson plan for the training method used on the Board Members and the Team Members was not developed.
- d. Checklists used in the area of design were not approved by the Team Chairperson.
- e. An OIAL has never been maintained. However, RSN documented this discrepancy under DR-91-S-037. Therefore, as part of the corrective action to this CAR, a follow-up will be performed on the DR

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12 Required Actions: Remedial Extent of Deficiency Preclude Recurrence Root Cause Determination

13 Recommended Actions:
Identify the remedial action to be taken to correct the deficiency noted in block 6. Identify the cause of the condition and the planned corrective action to prevent recurrence.

7 Initiator M. Diaz <i>Mario San</i> Date <u>3-13-92</u>	14 Issuance Approved by: QADD <i>R.C. Spence</i> Date <u>3/16/92</u>
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15 Response Accepted QAR <i>Mario San</i> Date <u>4-16-92</u>	16 Response Accepted QADD <i>R.C. Spence</i> Date <u>4/24/92</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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CORRECTIVE ACTION REQUEST (Continuation Page)

5 Requirements (continued)

document concurrence through the signatures of the following: the qualified instructor who prepared it; a technical peer or manager and the training coordinator."

PP-02-04, Rev. 0, Paragraphs 4.7 and 5.1, state in part that "The checklists shall be completed and approved by the team members and the Team Chairperson."

Paragraphs 4.8 and 6.8 state in part that "All items identified as unsatisfactory or open shall be tracked via the Open Item Action Log (OIAL) until closed. The OIAL is maintained by the Systems Engineering Department as part of the RSN YMP Management Information System."

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CORRECTIVE ACTION REQUEST (Continuation Page)

5 Requirements (continued)

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RSN Response: Reference Discrepancy 6.a.

Remedial Action Taken - Qualification documentation has been established and approved by the Readiness Review Chairperson for R. DeKlever. This documentation has been transmitted to the RSN Training Coordinator.

Root Cause Determination - The requirements were not clearly defined in the procedure.

Corrective Action to Preclude Recurrence - Procedure PP-02-04 will be revised to be more specific regarding Qualification requirements for all Board and Team members.

Reference Discrepancy 6.b.

Remedial Action Taken - The Indoctrination was performed by the Assistant Chairperson of this Readiness Review to the various RSN/YMP members. The procedure, PP-02-04, will be revised to state that ...indoctrination of RSN/YMP Readiness Review members will be performed by the Readiness Review Chairperson or designee and training of non-RSN/YMP Readiness Review members will be performed by the Chairperson or designee.

Root Cause Determination - Procedure too restrictive.

Corrective Action to Preclude Recurrence - Revise Procedure PP-02-04 to include indoctrination of RSN/YMP Readiness Review members and training of non-RSN/YMP Readiness Review members.

Reference Discrepancy 6.c.

Remedial Action Taken - The procedure will be revised to allow for an orientation in lieu of training when training is not necessary. The method of training chosen by the Readiness Review Board Chairperson was self-study assignment which does not require a lesson plan. Documented evidence of the self-study is in the training file.

Root Cause Determination - Procedure overly restrictive. Will clarify Indoctrination and Training requirements for members.

Ltr dtd 4/10/92 - RSN - YMP - 1327

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Corrective Action to Preclude Recurrence - Revise procedure to clarify requirements for indoctrination and Training lesson plans.

Reference Discrepancy 6.d.

Remedial Action Taken - The checklists for design has been signed and dated by the Readiness Review Chairperson. These documents have been transmitted to the Local Records Center.

Root Cause Determination - Required signature authority letter for Assistant Chairperson during absence of Readiness Review Chairperson.

Corrective Action to Preclude Recurrence - Procedure will be revised to make provisions for similar events occurring in the future.

Reference Discrepancy 6.e.

Remedial Action Taken - RSN has documented the open items in the Readiness Review Open Item Tracking Log although all open items for Readiness Review RMR-RR-001 has been closed out.

Root Cause Determination - Not enough attention to procedure detailed requirements.

Corrective action to Preclude Recurrence - A Readiness Review Open Items Log has been developed and will be implemented for subsequent Readiness Reviews.

Estimated Completion: 6-12-92

Responsible Individual: _____

R. L. Schreiner
R. L. Schreiner
Manager, Systems Engineering

Response Approval: _____

M. Wilson for R.L. Bullock

Date: _____

4-10-92