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

WBS 1.2.9.3

MAY 0 8 1992

Willis L. Clarke
Acting Technical Project Officer
for Yucca Mountain
Site Characterization Project
University of California
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P.O. Box 5514, L-217
Livermore, CA 94551

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF CORRECTIVE ACTION REQUEST (CAR) YM-92-018 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-92-05 OF LAWRENCE LIVERMORE NATIONAL LABORATORY

The YMQAD staff has verified the corrective action to CAR YM-92-018 and determined the results to be satisfactory. As a result, the CAR is considered closed.

If you have any questions, please contact either Robert B. Constable at (702) 794-7945 or Richard L. Weeks at (702) 794-7853.

R. E. Spence

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-3374

Enclosure:
CAR YM-92-018

cc w/encl:
K. R. Hooks, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
R. E. Monks, LLNL, Livermore, CA
J. A. Blink, LLNL, 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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WM-11
NH03

YMP-5

9205140308 920508
PDR WASTE
WM-11 PDR

ADD: Kin Hooks Ltr. Encl. 1, 1

ORIGINAL
THIS IS A RED STAMP

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

8 CAR NO.: YM-92-018
DATE: 12-10-91
SHEET: 1 OF 2
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document	2 Related Report No.
033-YMP-QP No. C, Revision 2 and 033-YMP-QP 18.0, Revision 3	Audit Report YMP-92-05
3 Responsible Organization	**4 Discussed With**
LLNL	R. Monks

5 Requirement:

No. C, Terms and Definition, states in part, "Adverse Finding: 3) a violation of an established policy, procedure, instruction, or drawing requirement."

Paragraph 18.0.5.6 states in part, "Each Adverse Finding is further identified and processed using a Corrective Action Report (CAR)..."

6 Adverse Condition:

Contrary to the requirement above, LLNL issued Audit Reports for Audits 91-02, 91-010, 91-14 and 91-15 which identified conditions that, as defined by LLNL Terms and Definitions, are Adverse Findings however, the Adverse Finding conditions were documented as Observations, Recommendations or Comments.

This condition is recurrent and was documented in CAR YM-91-060.

9 Does a significant condition adverse to quality exist?	10 Does a stop work condition exist?	11 Response Due Date:
Yes X No ___	Yes ___ No X ; if Yes - Attach copy of SWO	10 days from issuance
If Yes, Circle One: (A) B C	If Yes, Circle One: A B C D	

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

13 Recommended Actions:

Since this is a recurring condition an expedited response is requested of LLNL.

Complete and document remedial actions taken to correct specific deficiencies.

Investigate identified deficient documentation to determine extent of condition.

7 Initiator M. Diaz 12-10-91 Date	14 Issuance Approved by: QADD R.C. Spence Date 12/10/91
15 Response Accepted QAR Richard L. Monks Date 12/31/91	16 Response Accepted QADD R.C. Spence Date 1/2/92
17 Amended Response Accepted QAR Date	18 Amended Response Accepted QADD Date
19 Corrective Actions Verified QAR Robert R. Loux Date 5/4/92	20 Closure Approved by: QADD R.C. Spence Date 5/7/92

ENCLOSURE REV. 08/91

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

8 CAR NO.: YM-92-018
DATE: 12-10-91
SHEET: 2 OF 2
QA

CORRECTIVE ACTION REQUEST (Continuation Page)

13 Recommended Action(s) (continued)

Determine root cause of condition.

Document corrective actions taken to prevent recurrence of condition.

SEE VERIFICATION OF CORRECTIVE ACTION ATTACHED
RBC 5/4/92.

1: Corrective Action Response for CAR YM-92-018

A. Remedial Action - LLNL will review Audit reports for Audits 91-02, 91-10, 91-14, and 91-15. All comments, recommendations and observations noted will be evaluated against the definition of adverse findings.

Responsible Individual: Royce E. Monks Completion Date: 1/20/92

B. Investigative Action - To determine the extent of this condition, LLNL will extend the review to cover all LLNL YMP internal and external audit reports generated as a result of audits performed between June 1991 and December 1991. All comments, recommendations, and observations noted will be evaluated against the definition of adverse finding.

Responsible Individual: Royce E. Monks Completion Date: 1/20/92

C. Root Cause Determination - This condition was first noted during the YMPO Audit of the LLNL YMP QA Program in June 1991. A CAR was issued (CAR YM-91-060) at that time. Considerable dialogue ensued between LLNL and YMPO concerning appropriate measures to be taken to close this CAR. Additionally an internal audit at LLNL pointed out that variations in definitions between the QP and the QP Manual Tab C allowed considerable leeway on the part of the individual auditor in making a determination of appropriate documentation of audit concerns. A final response to the CAR was accepted by YMPO in October 1991. The corrective action resulted in a change to the QP and elimination of definitions in the QP, eliminating alternative definitions in the QP and refering auditors back to definitions in Tab C.

D. Corrective Action to Preclude Recurrence - QP 18.0, Rev. 3 and QP 18.1, Rev. 3 were issued for implementation on 11/1/91. Implementation of these procedures for future audits is expected to fully preclude recurrence of the noted condition. Change Notice C-2-1 was issued for implementation on 12/5/91. This Change Notice further clarified the definition of Adverse Finding.

Responsible Individual: Royce E. Monks Completion Date: 1/20/92

W. L. Clarke 12/26/91
Willis L. Clarke Date
Technical Project Officer
Yucca Mountain Project

Royce E. Monks 12/20/91
Royce E. Monks Date
Quality Assurance Manager
Yucca Mountain Project

VERIFICATION OF CORRECTIVE ACTION
CORRECTIVE ACTION REQUEST (CAR) YM-92-018

5/1/92

REMEDIAL ACTION:

A. Letter to File, 1/17/92, No. QA:92/014, R. Monks, stated: "Audit Nos. 91-02, 91-04, 91-06, 91-07, 91-10, 91-14, and 91-15, performed during time period of 6/91 through 12/91, were reviewed. All comments, recommendations, and observations were reviewed against the definition "Adverse Finding." None were determined to be adverse findings, therefore, no corrective actions were generated."

INVESTIGATIVE ACTION:

B. Pages 1, 2, and 3, as Attachments to this letter, state: "The determinations addressed above were concluded after specifically rationalizing the reasons for determining "Adverse Findings." These determinations were reviewed by the validator and concluded to be valid."

ROOT CAUSE:

C. Variations in definitions listed in Procedures/QP Manual, permitted considerable leeway in determinations of deficiencies.

CORRECTIVE ACTION:

D. Revision to QP 18.0, Revision 3, and QP 18.1, Revision 3, 11/1/91, deleted definitions for potential findings. C/N C-2-1 was issued against the QP Manual (12/5/91) to re-define the definitions of "Adverse Findings." All definitions are now in Section "C" of the QP Manual.

Signed: Robert B. Constable Date: 5-4-92.
Robert B. Constable