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MEMORANDUM

DATE: December 17, 1990

FOR: John J. Linehan, Director, HLPD, Division of High-Level Waste Management, M/S 4 H 3

FROM: John W. Gilray, Sr. OR - YMP

SUBJECT: YMP Site Report for the month of November, 1990

I. QUALITY ASSURANCE

A. QA Surveillance of the YMP Technical Requirements Document for Midway Valley and Calcite/Silica Activities

The YMP QA organization (Terry Noland and Jim Blaylock) conducted a QA surveillance (YMP-SR-91-006) of the YMP Technical Requirements Document for Midway Valley Trenching and Calcite/Silica Activities at Las Vegas on November 28, 1990, and at Sandia National Lab, Albuquerque, NM, on December 3 and 4, 1990, followed up by an exit meeting on December 5, 1990, at Las Vegas to discuss the results of this surveillance. I represented the NRC as an observer of the portion of the surveillance conducted at Las Vegas.

Check lists identifying the characteristics and processes were prepared and used throughout this surveillance. Particular attention was devoted by the surveillance team in a thorough review of the documented comments of reviewers and the resolutions to these comments. The final released Technical Requirements Document was also reviewed to determine that the resolutions to the comments were adequately incorporated in the document.

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In addition, the surveillance team traced the requirements in the Technical Requirements Document back to the higher level hierarchy requirements document to assure proper accountability and traceability.

Overall, the QA surveillance team determined that the "Technical Requirements Document for the YMP Midway Valley Trenching and Calcite/Silica Activities" (YMP/CM-007) was adequately and acceptably prepared and reviewed in accordance with the YMP QA procedures and controls and that no deficiencies were identified. Therefore it was concluded by the surveillance team that the YMP QA program was being effectively implemented throughout the YMP-review process.

On-Site Representative Comments:

This limited surveillance was useful, productive, and effective. The checklist used by the surveillance team was well prepared and utilized through the surveillance process. In particular the surveillance team exhibited a thoroughness in their review of the comments and resolutions and in their check to assure that the resolutions were properly incorporated in the Technical Requirements Document and closed out by the commenters. As a result of this surveillance there is reasonable assurance that the Technical Requirements Document was properly prepared and rereviewed in accordance with the YMP QA program procedures and controls.

Additional surveillances by the YMP will be necessary in order to verify acceptable implementation of corrective actions resulting from deficiencies relating to the Midway Valley, Calcite/Silica activities which were identified in the previous audit of the YMP QA program.

I have prepared a draft observation report detailing the results of this surveillance and submitted it to Ken Hooks for review and comments.

B. Readiness Review for Site Characterization Activities Pertaining to Midway Valley Trenching

The YMP plans to conduct on December 18 through 21, 1990, at Las Vegas, a readiness review of planning, procedures, drawings, specifications, controls and QA records to determine if all requirements and conditions to start site characterization activities pertaining to Midway Valley trenching are in place and acceptable. The readiness review process will be conducted in accordance with the YMP Readiness Review Procedure AP-5-13Q. The YMP QA organization will be a major participant in this readiness review and will perform similar to an audit function. The NRC On-Site representatives will participate as observers at this readiness review along with representatives from the NRC staff.

C. YMP QA Audit of T&MSS (SAIC)

The YMP QA Organization conducted a QA audit of Science Applications International Corporation's (SAIC) QA Program and quality related activities from November 13 through November 19 in Las Vegas, Nevada. This audit was observed by Teek Verma, John Buckley, and Tom Trbovich (Southwest Research Institute) representing NRC and by Susan Zimmerman representing the State of Nevada.

In the opinion of the audit team, the SAIC QA Program is adequate for initiation of quality-affecting activities. However, specific elements of the QA Program were identified as either indeterminate (due to a lack of implementation), marginally effective or ineffective. The following is a summary of those elements of the SAIC QA Program judged by the audit team to be indeterminate or marginally effective.

1. Due to the lack of sufficient implementation, the effectiveness could not be determined in the areas of Criteria 8 (Identification and Control of Items, Samples, and Data); Criteria 11 (Test Control); Criteria 13 (Handling, Shipping, and Storage); Criteria 14 (Inspection, Test and Operating Status); Criteria 19 (Software Quality Assurance); and Criteria 20 (Scientific Investigation Control).

2. In the area of Criteria 4 (Procurement Document Control), the audit team found several disconnects within the implementing procedures related to the process for the purchase of commercial grade items. Based on these conditions found in the procedures, the area was considered marginally effective.

3. In the area of Criteria 12 (Calibration), the audit team found implementation to be ineffective. This was based on SAIC's Quality Finding Reports (QFRs) which had been written to identify deficiencies found in implementation of the program procedures. The measures that have been taken by SAIC's management to date have not corrected the conditions.

The results of the audit documented five (5) Corrective Action Requests (CAR) that identified conditions adverse to quality found during the course of the audit investigation. The CARs related to deficiencies found in the areas of: Indoctrination and Training, Procurement, Instructions, Procedures and Plans, Inspection, and Corrective Action. None of the CARs generated as a result of the audit, either collectively or individually, represent a breakdown in the QA Program. What they do represent is a need for management attention to bring the SAIC QA Program into full compliance. Nine potential CARs were resolved during the course of the audit.

It is recognized by the audit team that the SAIC QA Program has only been in effect since May 21, 1990.

I understand that Teek Verma and John Buckley have drafted their observation report of this audit which will soon be released.

D. Status of YMP QA Workshops

The YMP QA Workshop reconvened on December 5 and 6, 1990, with participating members from the YMP and YMP Participants in attendance. The December 5 workshop was attended by P. Prestholt and J. Gilray (NRC On-Site Representatives) as observers and the December 6 workshop was attended by P. Prestholt. A formal Summary Report of the QA workshops will be prepared by the YMP and issued with NRC and the NWTRB on distribution.

The purpose of this QA workshop was to prepare a summary of the workshop process, findings, recommendations and proposed action items of the previous workshops (refer to J. Gilray, P. Prestholt memos of October 16, and October 31, 1990, to J. Linehan regarding the results of the previous workshops) and to develop summary slides and material for a formal presentation to the YMP with C. Gertz, Max Blanchard, and Don Horton in attendance. The formal presentation was presented to the YMP December 6, 1990, by members of the workshop.

Highlights of this workshop follows:

- The recommendations provided to the YMP on December 6 were accepted by C. Gertz and he agreed to devote the necessary resources to carry out these recommendations.

- With this agreement from C. Gertz the members of the workshop reconvened and identified and assigned action items as a start in carrying out the recommendations. These action items are:

1) Simplify the publication release process.
2) Establish an effective training process.
3) Simplify the preparation and use of procedures.
4) Clarify and simplify the document hierarchy.
5) Develop a charter for establishing a Technical Advisory Committee on QA Issues.
6) Develop a charter for establishing a Technical Advisory Committee on QA Issues.
7) Initiate development of an appeals process.
8) Set up a QA workshop on Software QA.
9) Set up a follow-up meeting to discuss the status of action item completion.

The next QA workshop to discuss the status of completing the action items is tentatively scheduled to be held in Las Vegas on January 23, 1991.

NRC On-Site Representatives Comments:

These QA workshops consisting of TPO's, Scientists, Technical and QA personnel from YMP participants are very productive in creating a clearer understanding and improved cooperation between technical, scientist and QA personnel. These workshops have created an attitude change between the scientists and QA personnel whereby the scientists are now demonstrating a willingness to work with QA, management and technical personnel in the preparation of QA procedural controls and in implementing these procedures. A definite cooperative spirit is exhibited at these workshops. It still remains to be seen how the accomplishments of these workshops are to be received by others outside the workshop, i.e., participants. However, with the scientists being part of the solution, this should facilitate in gaining greater acceptance of the workshop recommendations.

In summary we believe the QA workshops will contribute in bringing about an improved understanding and cooperation between the scientists, management, technical and QA personnel relative to developing and implementing QA procedural controls.

Paul Prestholt and myself have prepared a memorandum detailing the scope and results of this workshop and submitted it to John Linehan for information.

II. WASTE PACKAGE

The LLNL November monthly status report is enclosed. (Enclosure 1). It is encouraged that comments and/or questions regarding the contents of this report be directed through this office for action and resolution in order to minimize the impact on the YMP.

There are no new issues that this office has identified that have not been brought to management's attention.

cc w/enc: K. Hooks, M/S 4H3; J. Bunting, M/S 4H3; J. Latz
wo/encs: D. Shelor, C.P. Gertz, R.E. Loux, M. Glora, G. Cook, D.M. Kunihiro, D. Weigel, R.E. Browning, M/S 4H3; H. Denton, M/S 17F2, R. Bernero, M/S 6A4; H. Thompson, M/S 17G21; S. Gagner, M/S 2G5; L. Kovach, M/S NLS260