

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

QUALITY ASSURANCE PROGRAM

QUARTERLY TRENDS REPORT

COVERING THE PERIOD JULY 1991 - JUNE 1992

Approved



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## EXECUTIVE SUMMARY

### 1.0 Introduction

Quality Assurance Administrative Procedure (QAAP) 2.9, *Quality Assurance Program Trend Evaluation and Reporting*, Revision 3, requires that each of the OCRWM Quality Assurance Divisions evaluate, at quarterly intervals, all Corrective Action Requests (CARs) issued within the last twelve months that identified significant conditions adverse to quality. The purpose of this evaluation is to determine if any adverse trends or generic adverse trends are evident in the OCRWM QA Program and to take prompt corrective action where such trends exist.

This report covers the period from July 1, 1991 through June 30, 1992 and evaluates all CARs that reported either Severity Level 1 conditions (using the previous CAR classification method) or Significant Conditions Adverse to Quality (using the current CAR classification method). This evaluation incorporates new data from CARs issued during the quarter April-June 1992.

Section 1 reports the results of the Headquarters Quality Assurance Division (HQAD) trend evaluation. Section 2 reports the results of the Yucca Mountain Site Characterization Project Quality Assurance Division (YMQAD) trend evaluation. Each section provides the status of previously reported adverse trends and identifies current adverse or generic adverse trends. Each section also contains details on problems constituting current adverse or generic adverse trends, discusses causes and actions to correct these trends, and includes a table of CARs that were evaluated.

### 2.0 Summary

A total of fourteen (14) CARs were evaluated during the reporting period. The HQAD evaluated six (6) CARs and the YMQAD evaluated eight (8) CARs. No adverse trends or generic adverse trends were evident in either of the evaluations.

Four (4) CARs were issued that identified deficiencies in the area of Quality Assurance records, one at HQ, and three at YMP. CAR HQ-91-033 reported that a QA records system has not been established and implemented by EM-343. CAR YM-91-065 reported that some illegible or incomplete QA records were being processed because of the lack of clear and precise acceptance criteria in upper tier documents. CAR YM-91-082 reported failure to submit auditor qualification records to the Local Records Center (LRC) because DOE System 80 had not yet been implemented at YMP. CAR YM-92-033 reported that records submitted to the LRC were not traceable to the applicable Job Package or study plan and field procedures were not explicit in implementing record turnover requirements. An Administrative Procedure was not in place to provide adequate direction and control of Job Package records. Although all four CARs report deficiencies in the same program area, each condition differs. Therefore, it has been determined that no generic adverse trend exists in QA records.

## **SECTION 1**

### **HEADQUARTERS**

#### **1.0 Status of Previously Reported Trends**

There are no previously reported trends.

#### **2.0 Current Adverse and Generic Adverse Trends**

No adverse or generic adverse trends were evident from an evaluation of six (6) Corrective Action Requests (CARs), issued by Headquarters during the last twelve months that identified significant conditions adverse to quality.

See Table 1-1, Significant Condition Data Base for HQ Trend Evaluation, for a list of CARs evaluated.

#### **3.0 Problems Constituting Current Adverse Trends or Generic Adverse Trends**

Since there are no current adverse or generic adverse trends at Headquarters, no problems constituting trends are evident.

#### **4.0 Summaries of Identified Causes and Actions Required to Correct Current Adverse Trends or Generic Adverse Trends**

Not applicable.

**TABLE 1-1: SIGNIFICANT CONDITION DATA BASE FOR HQ TREND EVALUATION**

<b>CAR Number</b>	<b>CAR Issue Date</b>	<b>Resp. Org.</b>	<b>Adverse Condition</b>
HQ-91-033	09/17/91	EM-343	A quality records system has not been established and implemented.
HQ-91-035	10/22/91	EM-343	Generic noncompliance with procedures.
HQ-91-036	10/22/91	EM-343	Inadequate training program.
HQ-91-039	10/22/91	EM-343	Work in the quality assurance program has not been classified.
HQ-92-003	11/08/91	RW-30	Technical baseline for transportation is not available.
HQ-92-007	03/30/92	ORNL	Procurement documents do not contain QA program requirements and were not subjected to QA or technical review.

## SECTION 2

### YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT

#### 1.0 Status of Previously Reported Trends

There are no unresolved adverse quality trends, and no unresolved trends carried over into the quarter April-June 1992.

#### 2.0 Current Adverse and Generic Adverse Trends

Eight (8) CARs issued by the Yucca Mountain Quality Assurance Division (YMQAD) during the past twelve months identified significant conditions adverse to quality. No adverse or generic adverse trends were identified during evaluation of those CARs.

Although three CARs were issued that reported deficiencies in the area of QA Records, the CARs did not identify related conditions that constitute a trend. One CAR (YM-91-065), reported that some documents processed as QA records were either illegible or lacked some of the required entries, and the use of the "Best Available Copy" stamp was judged to have taken the place of record enhancement or documented justification for retaining partially legible records. Because the upper-tier Quality Assurance documents do not contain clear and precise acceptance criteria for record legibility and completeness, varying interpretations have been incorporated into Participants' records procedures and varying opinions exist as to what constitutes a complete and legible record.

The second CAR (YM-91-082) reported qualification records for auditors who were no longer on the program were not submitted to the LRC. This condition occurred because the records, which are classified as privileged records subject to the Privacy Act, must be processed in accordance with DOE's System 80 requirements. At the time this CAR was issued, DOE System 80 had not been implemented at YMP.

The third CAR (YM-92-033) reported that records submitted to the LRC were not directly traceable to the applicable Job Package number or study plan and field procedures were not explicit in implementing record turnover requirements.

See Table 2-1, Significant Condition Data Base for YMP Trend Evaluation, for a list of CARs evaluated.

#### 3.0 Problems Constituting Current Adverse Trends or Generic Adverse Trends

In the absence of current trends or generic adverse trends, no such problems exist.

**4.0 - Summaries of Identified Causes and Actions Required to Correct Current Adverse Trends or Generic Adverse Trends**

Not applicable.

TABLE 2-1: SIGNIFICANT CONDITION DATA BASE FOR YMP TREND EVALUATION

CAR Number	CAR Issue Date	Resp. Org.	Adverse Condition
YM-91-065	07/91	YMP	Some documents processed as QA records were either illegible or lacked some of the required entries, and the use of the "Best Available Copy" stamp was judged to have taken the place of record enhancement or documented justification for retaining partially legible records.
YM-91-078	08/91	SNL	An ICN to the audit procedure removed the time limit for issuing audit reports, although the SNL QAPP set a limit of 30 calendar days; at least 10 SNL audit reports were issued later than permitted by the QAPP.
YM-91-082	09/91	YMQAD	Qualification records for auditors who were no longer on the program were not submitted to the LRC.
YM-92-005	10/91	YMP (PNL)	Battelle's Pacific Northwest Laboratories were performing Project quality-related work without an OCRWM-approved QA program.
YM-92-007	10/91	YMP	Lack of procedure to control modification of NVO contracts to support YMP.
YM-92-018	12/91	LLNL	Adverse audit findings being reported as observations.
YM-92-023	02/91	YMP	Major procedure changes classified as minor on ICNs.
YM-92-033	04/92	YMP	Individual records not traceable to study plan or Job Package.