

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT  
YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION  
QUALITY ASSURANCE SURVEILLANCE REPORT OF  
REVIEW OF PROGRAM RECORDS WITH LEGIBILITY DEFICIENCIES  
SURVEILLANCE NUMBER YMP-SR-93-007

CONDUCTED DECEMBER 21, 1992 THROUGH JANUARY 8, 1993

ACTIVITIES SURVEILLED:

ALL AUDIT REPORTS FOR FISCAL YEAR 1992 FOR  
INSTANCES OF RECORD LEGIBILITY PROBLEMS, RECORD PACKAGES HAVING  
LEGIBILITY PROBLEMS IDENTIFIED DURING AUDITS,  
RESOLUTION ACTIVITY TO DATE FOR  
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT  
CORRECTIVE ACTION REQUEST YM-93-004  
AND FOR ROOT CAUSE OF RECORDS LEGIBILITY PROBLEMS

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Date: 2-22-93

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Date: 2/25/93

## **1.0 EXECUTIVE SUMMARY**

This surveillance was performed to establish the number of records packages with legibility deficiencies that had been reported in audits performed during the Fiscal Year (FY) 1992 reporting period and to evaluate the root cause along with proposed resolution to Corrective Action Request (CAR) YM-93-004. The proposed response to the CAR includes a revision to Administrative Procedure (AP)-1.18Q that previously allowed entry of deficient records by all Las Vegas, Nevada, record sources. This revision requires stricter controls for establishing adequacy of records to be accepted. Currently, the proposed response is unapproved and has no official status.

## **2.0 SCOPE**

This surveillance determined the number of records packages that have been identified with illegibility problems during the conduct of FY 92 audits, and evaluated the deficiencies for root cause along with CAR YM-93-004 proposed resolution for assurance of correction.

## **3.0 SURVEILLANCE TEAM**

Thomas E. Vandel, Senior Quality Assurance Engineer, MAC Technical Services/Yucca Mountain Quality Assurance Division

## **4.0 PERSONNEL CONTACTED DURING THE SURVEILLANCE**

John Gandi, U.S. Department of Energy (DOE), Manager, Information Resources  
JoAnne Jacobson, Management and Operating Contractor (M&O/TRW), Supervisor,  
Central Records Facility  
Lynda Lee, M&O/TRW, Manager, Project Records Center  
Kim Quinnell, M&O/TRW, Work Leader, Microfilm Processing Center  
Carol Rickford, M&O/TRW, Records Management Supervisor  
Cindy Sellards, Science Applications International Corporation, Records Management  
Specialist

## **5.0 SURVEILLANCE RESULTS**

### **5.1 Requirements Tree**

The following represent the requirements specific to the legibility concern:

10 CFR Part 50, Appendix B: No requirement  
NQA-1, Basic: Section 17.0, "QA Records," requires records should be legible  
NQA-1, Supplemental 17S-1: Section 3.2(c) requires procedures for receipt and inspection of incoming records

DOE/RW-0333P Quality Assurance Requirements and Description document:  
Section 17.2.3.c requires legibility and completeness of QA records  
shall be verified

**Records Management Plan:**

Appendix B, Section B.3.2 requires review of incoming records for adequacy for microfilming

Appendix B, Section Part 4 requires completed films must be reviewed for faults and redone if required.

## 5.2 Illegible Packages

The following records packages were found to be illegible:

**Los Alamos National Laboratory Packages**

(Audit Report YMP-92-12)

PR Z 3407 NNA 91048/4414

PR Z 3407 NNA 91048/4416

**Sandia National Laboratories Packages**

(Audit Report YMP-92-22)

51/L02-03/01/80 Mechanical Properties

51/L02-07/11/90 Linear cutting tests

55/F13-05/15/87 Prototype thermal stress testing

**Lawrence Livermore National Laboratory (LLNL) Packages**

(Audit Report YMP-92-02 and CAR YM-92-068)

91039-0264-0435 Scientific Notebook 00142

**Yucca Mountain Site Characterization Project Office Packages**

(Audit Report YMP-92-24 and CAR YM-93-004)

NNA 920807.066

NNA 920807.076

## 5.3 Surveillance Details

Review of all FY 92 audit reports established the records packages with illegibility problems (see 5.2 above). All of the packages listed, except the LLNL package, were considered to have the same root cause problem.

AP-1.18Q, Revision 1, allowed blanket use of a documentation stamp on the cover page of packages that contained illegible documents. This allowed packages, with deficient information, to become records. A proposed corrective action response to

CAR YM-93-004, includes a revision to AP-1.18Q that will require a more positive approach to assuring legible records if at all possible or an application of a documentation stamp directly on an affected page.

A new form is proposed to be completed by the originator who will describe the impact of the deficiency. This form will then be placed directly preceding the affected page of the record and will be signed by the record source and the appropriate manager prior to submitting the record package to Las Vegas Local Records Center. The proposed response is under review by DOE.

The LLNL concern was an isolated incident where the microfilm record appeared to have cut off some of the information. However, corrective action review found that no information had been lost. The response acknowledged the deficiency; however, no quality related information was lost. This CAR was verified and subsequently closed.

## **6.0 RECOMMENDATIONS**

The adoption of the proposed response to CAR YM-93-004 is recommended.