



**Department of Energy**  
Yucca Mountain Site Characterization  
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WBS 1.2.9.3

OCT 07 1992

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**EVALUATION OF RESPONSES TO CORRECTIVE ACTION REQUESTS (CAR) YM-92-066 AND  
YM-92-067 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD)  
AUDIT YMP-92-21 OF LAWRENCE LIVERMORE NATIONAL LABORATORY**

The YMQAD staff has evaluated the responses to CARs YM-92-066 and YM-92-067. 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 date. Please send a copy of extension requests to Nita Brogan, YMQAD.

If you have any questions, please contact either Robert B. Constable at (702) 794-7945 or Mario R. Diaz at (702) 794-7974.

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-284

Enclosure:  
CARs YM-92-066 and YM-92-067

cc w/encl:  
K. R. Hooks, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
J. A. Blink, LLNL, Las Vegas, NV  
D. W. Wolfe, LLNL, Livermore, CA  
J. H. Rusk, MACTEC, Las Vegas, NV, 517/T-12

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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PDR WASTE  
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PDR

YMP-5

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-92-066  
DATE: 8-21-92  
SHEET: 1 OF 1  
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document 033-YMP-QP-18.0/033-YMP-QP-17.0		2 Related Report No. Audit Report YMP-92-21	
3 Responsible Organization LLNL		4 Discussed With Dean Wolfe	
5 Requirement:  033-YMP-QP-18.0, Revision 3, Para. 18.0.5.4 states in part, "The audit plan includes the QAPP requirements."  033-YMP-QP-17.0, Revision 4, Para. 17.0.5.2 states in part, "The records must be transmitted to the LRC by the record source no later than 10 working days after the records are completed."			
6 Adverse Condition: Audit reports have been issued without following procedural requirements.  Examples are:  Audit Report No. YMP-92-03 was issued on March 19, 1992 but it was transmitted to the LRC on May 11, 1992.  Audit YMP-92-05. The audit plan does not contain any QAPP elements. Additionally, the audit report was issued on June 9, 1992, but was not transmitted to the LRC until June 26, 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 working days from issuance			
12 Required Actions: <input 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: 1. Randomly select a sample of completed audit reports and determine if this is a repetitive condition. 2. Identify measures to preclude recurrence. 3. Investigate to determine what caused the problem.			
7 Initiator Mario R. Diaz <i>Mario Diaz</i> Date 8-14-92		14 Issuance Approved by: QADD <i>R.C. Spencer</i> Date 8/25/92	
15 Response Accepted QAR <i>Mario Diaz</i> Date 10-2-92		16 Response Accepted QADD <i>R.C. Spencer</i> Date 10/7/92	
17 Amended Response Accepted QAR Date		18 Amended Response Accepted QADD Date	
19 Corrective Actions Verified QAR Date		20 Closure Approved by: QADD Date	

ENCLOSURE

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WASHINGTON, D.C.

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Date: 9/18/92  
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**CORRECTIVE ACTION REQUEST (continuation sheet)**

1. Corrective Action Response For CAR # YM-92-066

A. Remedial Action

Not Required

B. Investigative Action

Investigative action has been completed and included the following:

- 1) Audit plans for all 1992 internal audits (92-01, 92-02, 92-03, 92-04 and 92-05) were examined and found to include the appropriate QAPP elements. Only the audit plan for 92-05, identified by the auditor, inadvertently did not include the QAPP elements. This condition was mitigated by the fact that the audit schedule did identify the audit elements and the audit plan included all applicable QPs that are keyed to the applicable elements by their numbering method.
- 2) The time required for all 1992 audit report record packages was examined. They are as follows:

Audit No.	Report Issuance Date	Record Pkg Submittal Date	Elapsed Time (10 work days)
92-01	12/13/91	12/16/91	1 w day
92-02	2/13/92	2/13/92	0 w days
92-03	3/19/92	4/10/92 (not 5/11/92)	16 w days
92-04	3/31/92	4/8/92	6 w days
92-05	6/9/92	6/10/92 (not 6/26/92)	1 w day

10 working days are permitted from record authentication to submittal to the LRC. The LRC submittal dates used by the auditor were in error for audits 92-03 & 05. This was apparently due to the unfortunate misinterpretation by the auditor. The dates listed in the CAR were those of record correction dates, not original submittal dates.

As a result of the investigation, it appears that both of these cited discrepancies were isolated cases.

*Ltr dtd 9/21/92 - LLYMP9209132*

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**CORRECTIVE ACTION REQUEST (continuation sheet)**

C. Root Cause Determination

The first condition is an isolated oversight. The second condition cited was apparently due to the record source being a part time, non-LLNL employee, who was on travel.

D. Corrective Action to Preclude Recurrence

No specific action to preclude recurrence of the isolated condition of failure to include QAPP elements in an audit report is necessary other than issuance of this CAR and compliance with procedural requirements. Also, it is not expected that the isolated occurrence of late submittal of an audit record package will be repeated.

However, to improve the performance of records turnover to the LRC, LLNL is initiating on October 1 a "QC chart" tracking of actual submittals. Based on the information gained, additional improvement efforts may be initiated periodically.

2. Responsible individual and commitment date

Wolfe/Hamati - Completed

For: *W. C. Clarke*

3. Response Approved by: *William G. Halsey* Date: 9/18/92  
TPO

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U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

8 CAR NO.: YM-92-067  
DATE: 8-21-92  
SHEET: 1 OF 1  
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document 033-YMP-QP-17.0		2 Related Report No. Audit Report YMP-92-21	
3 Responsible Organization LLNL		4 Discussed With D. Wolfe/R. Hamati	
5 Requirement: 033-YMP-QP-17.0, Revision 4, Para. 17.0.5.2 states in part, "Record segments, such as calibration information, are not required to be submitted to the LRC until the package is complete, which occurs when the equipment is no longer used."			
6 Adverse Condition: QA Records of several Measuring and Test Equipment (M&TE) have not been transmitted to the LRC after they have been declared no longer in use.  Calibration information of the following M&TE, ID Nos. 999GM07, 3763795, 4778699, 4260941, 5067198, 3642427, 5015199, 4935825, and 5015205, were not found as QA records in the LRC. Some of these equipment have been declared no longer in use as of October 1, 1991.			
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 working days from issuance	
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: 1. Take the necessary action to transmit the calibration records noted in Block 6 to the LRC. 2. Take actions to: Determine extent of deficiency, action to preclude recurrence, and determine root cause.			
7 Initiator Mario R. Diaz <i>Mario Diaz</i> Date <u>8-14-92</u>		14 Issuance Approved by: QADD <i>R.C. Spruce</i> Date <u>8/25/92</u>	
15 Response Accepted QAR <i>Mario Diaz</i> Date <u>9-2-92</u>		16 Response Accepted QADD <i>R.C. Spruce</i> Date <u>10/7/92</u>	
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**CORRECTIVE ACTION REQUEST (continuation sheet)**

1. Corrective Action Response For CAR # YM-92-067

A. Remedial Action

Calibration QA records packages for all M&TE no longer in use (instruments listed in the CAR and all unused M&TE) have been prepared. These records, with the exception of eight that are waiting signature of the appropriate TALs, have been turned into the LRC. These eight packages will be signed and turned over to the LRC. All calibration records packages will be turned over to the CRF in accordance with the 30 day requirement.

B. Investigative Action

Investigative action is complete. All M&TE and associated records were reviewed to identify those that are no longer in use.

C. Root Cause Determination

Root cause determination is complete. LLNL administrative procedures specify that calibration records be held for one year after the equipment is taken out of use for a specific experiment in case the instrument is required for other activities. This is the cause of not complying with the requirement for transmittal of calibration record packages to the LRC when the instrument is declared to be no longer in use. However, this condition is mitigated by the fact that calibration records are maintained by LRC personnel in fire rated cabinets in the LRC, but not in QA records files.

D. Corrective Action to Preclude Recurrence

LLNL has discontinued the administrative practice of holding calibration records for one year and is following the QP as written. The administrative procedure will be revised to agree with the QP.

2. Responsible individual and commitment date

Barbara Bryan

Commitment Date: 10/30/92

For: *W. C. Clarke*

3. Response Approved by: *William B. Halsey* Date: 9/18/92  
TPO

*Ltr dtd 9/21/92 - LL4MP9209132*