

### **Department of Energy**

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

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OCT 06 1992

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EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-068 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-92-21 OF LAWRENCE LIVERMORE NATIONAL LABORATORY

The YMQAD staff has evaluated the response to CAR YM-92-068. The response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this date must be requested in writing with appropriate justification prior to the date. Please send a copy of extension requests to Nita J. Brogan.

If you have any questions, please contact either Robert B. Constable at (702) 794-7945 or Charles C. Warren at (702) 794-7248.

Richard E. Spence, Director

Yucca Mountain Quality Assurance Division

YMQAD:RBC-5949

Enclosure: CAR YM-92-068

cc w/encl:

KT R. Hooks, NRC, Washington, DC

S. W. Zimmerman, NWPO, Carson City, NV

Dean Wolfe, LLNL, Livermore, CA

J. A. Blink, LLNL, Las Vegas, NV

J. H. Rusk, MACTEC, Las Vegas, NV

cc w/o encl:

J. W. Gilray, NRC, Las Vegas, NV

N. J. Brogan, SAIC, Las Vegas, NV, 517/T-12

9210150163 921006 PDR WASTE WM-11 PDR

ADD: Ken Hooks LAr. Encl.

102.7 1. WM-11.

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

8 CAR NO.:	YM-92-068	
	8-21-92	
SHEET: _	1 OF 1	
	QA	

	WASH	INGTON, D.C.		47			
CORRECTIVE ACTION REQUEST							
1	1 Controlling Document LLNL Quality Procedure 033-YMP-QP 17.0		2 Related Report No. YMP-92-21				
3	Responsible Organization LLNL	4 Discussed With D. Wolfe/B. Bryan					
5	Requirement:	<del>'</del>					
	Paragraph 17.0.5.3 states the following: "R inspected to assure they are legible"	Record transmittals re	ceived by t	he LRC are			
6	Adverse Condition:	<del> </del>					
Contrary to this requirement, there was no objective evidence that the LRC inspected and accepted Records Package for Scientific Notebook 00142 as legible (i.e., approximately 30% of the Notebook pages had signature blocks partially or completely cut off on both hardcopy and film at the LRC).							
Also, one Certificate of Calibration for multimeter ID 5067303, dated September 6, 1991, was found to contain illegible information.							
				·			
9	Does a significant condition 10 Does a	stop work condition exist?	?	11 Response Due Date:			
	· · · · · · · · · · · · · · · · · · ·	Yes No_X_; if Yes - Attach copy of SWO If Yes, Circle One: A B C D		20 working days from issuance			
1	<sup>2</sup> Required Actions: X Remedial X Extent of Defi	iciency 🗓 Preclude R	ecurrence	Root Cause Determination			
13 Recommended Actions:  Correct LRC and CRF (if required) copies of Scientific Notebook 00142. Determine cause of condition. Determine if other inspected/accepted Scientific Notebooks indicate similar problems. Take appropriate action to preclude recurrence.  Verify that Certificates of Calibration for M&TE maintained by the LRC are legible.  Take appropriate action to correct any potential deficiency and preclude recurrence.							
7	Initiator C. C. Warren	14 Issuance Appro	Vac	- Whelma			
15 Response Accepted  Date 14 32 QADD Date Date 25/92  16 Response Accepted							
1	OAR C.C. Warm Date 9-25-52 OADD Chor Own Date 10-2-92  17 Amended Response Accepted  18 Amended Response Accepted						
	QAR Date	QADD	•	Date			
1	9 Corrective Actions Verified	20 Closure Approv	ed by:	Date			
	QAR Date	QADD		Date			

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

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#### CORRECTIVE ACTION REQUEST (continuation sheet)

- 1. Corrective Action Response For CAR # YM-92-068
  - A. Remedial Action (not completed yet)
    - 1) Scientific Notebook condition The original of scientific notebook 00142 was inspected. It was found that no signatures in the original were cut off in the photo copying process. QP 3.4 Section 3.4.5.2.2 states that the investigator should initial and date each entry. Some entries are several pages long, so each page do not have to be initialed. The required signatures for 00142 were verified to be photocopied. The partial signature blocks (part cut off during photo copying) did not contain nor were required to contain signatures. Those that required signatures were verified to be properly copied.

Scientific Notebooks found to contain discrepancies during the investigative action will be reviewed against the microfilmed copy to verify legibility. If the microfilmed copy is not legible and the content can not be determined from the context, LRC personnel will obtain the original SN and photocopy the illegible pages and submit replacements to the original record (CRF).

- 2) The calibration coordinator has contacted the appropriate person for a replacement of the one C of C that contained illegible information.
- B. Investigative Action
  - 1) The Investigative action has been completed:
    The records center has processed 76 Scientific Notebooks through to the CRF.
    All of these notebooks were reviewed for illegible pages; 17 have minor discrepancies. Most of these discrepancies are the partial cutting off of words at the end of the page.
  - 2) During the collection of calibration records into records packages for CAR YM-92-67, all calibration records were checked for legibility. No other instances of illegibility were found.
- C. Root Cause Determination

The root cause determination is complete. The root cause of the processing of illegible records and/or illegibility introduced by the photocopying in the LRC is attributed to human error. The LRC processes approximately 50 record packages to the CRF monthly. The percentage of illegible pages is very slight. A quarterly report on all participant LRCs that originates at and is distributed by

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#### CORRECTIVE ACTION REQUEST (continuation sheet)

YMPO shows that LLNL performs within the 99% range quarterly. This proves that LRC awareness and performance is good.

D. Corrective Action to Preclude Recurrence

Corrective action to preclude recurrence is complete. LRC personnel have been briefed on this problem (they had to recheck the SNs in B above) and have been instructed to use more caution in checking all records received by the LRC before processing them to the CRF. A desk procedure has been used by LRC personnel to aide in records inspection. This procedure was reviewed and found to be adequate.

To facilitate improvement in this area, additional emphasis on record legibility and SN entries will be placed during QA surveillances. Surveillance 92-11 was performed of records and results of this surveillance are consistent with the good performance of LRC personnel.

2. Responsible individual and commitment date

Barbara Bryan

Commitment Date: 10/30/92

William 6. Halaby Date: 9/18/92 3. Response Approved by