



Department of Energy  
Yucca Mountain Site Characterization  
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WBS 1.2.9.3

OCT 29 1992

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EVALUATION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-070  
RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT  
YMP-92-22 OF SANDIA NATIONAL LABORATORIES

The YMQAD staff has evaluated the amended response to CAR YM-92-070. The amended 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, Science Applications International Corporation, Las Vegas, Nevada.

If you have any questions, please contact either Robert B. Constable at (702) 794-7945 or Cynthia H. Prater at (702) 794-7742.

*Robert B. Constable* for

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-652

Enclosure:  
CAR YM-92-070

cc w/encl:

K. R. Hooks, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
R. R. Richards, SNL, 6319, Albuquerque, NM  
J. H. Rusk, MACTEC, Las Vegas, NV  
W. B. Simecka, YMP, NV

cc w/o encl:

J. H. Hines, OGD, AL  
J. W. Gilray, NRC, Las Vegas, NV  
N. D. [unclear] SAIC, Las Vegas, NV, 517/T-12

9211060232 921029  
PDR WASTE  
WM-11 PDR

YMP-5

ADD: Ken Hooks

44- Encl.

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WM-11  
NH03

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

8 CAR NO.: YM-92-070  
DATE: 9-1-92  
SHEET: 1 OF 1  
QA

**CORRECTIVE ACTION REQUEST**

1 Controlling Document DOP 3-13		2 Related Report No. Audit YMP-92-22									
3 Responsible Organization SNL		4 Discussed With John Friend									
5 Requirement: DOP 3-13, Revision C, Section 5.3, paragraph 2, states "Ensure that completed DRC forms are included with records required by applicable procedures."  Note: DRC forms are required to be part of the TP record package.											
6 Adverse Condition: Contrary to the above requirements, there was no documented evidence that DRC forms were completed for the following Technical Procedure (TP) Interim Change Notices (ICNs):  <table style="width: 100%; border: none;"> <tr> <td style="width: 25%;">TP-90, ICN 1</td> <td style="width: 25%;">TP-91, ICN 1</td> <td style="width: 25%;">TP-92, ICN 1</td> <td style="width: 25%;">TP-93, ICN 1</td> </tr> <tr> <td>TP-94, ICN 1</td> <td>TP-96, ICN 1</td> <td>TP-201, ICN 1</td> <td></td> </tr> </table>				TP-90, ICN 1	TP-91, ICN 1	TP-92, ICN 1	TP-93, ICN 1	TP-94, ICN 1	TP-96, ICN 1	TP-201, ICN 1	
TP-90, ICN 1	TP-91, ICN 1	TP-92, ICN 1	TP-93, ICN 1								
TP-94, ICN 1	TP-96, ICN 1	TP-201, ICN 1									
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 days after issue											
12 Required Actions: <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Extent of Deficiency <input checked="" type="checkbox"/> Preclude Recurrence <input type="checkbox"/> Root Cause Determination											
13 Recommended Actions: Identify the remedial action to be taken to correct the deficiency identified in Block 6. Identify the extent of the condition and the planned corrective action to prevent recurrence.											
7 Initials  Date <u>8/21/92</u>		14 Issuance Approved by: QADD Date <u>9/2/92</u>									
15 Response Accepted QAR _____ Date _____		16 Response Accepted QADD _____ Date _____									
17 Amended Response Accepted QAR Date <u>10/26/92</u>		18 Amended Response Accepted QADD Date <u>10-28-92</u>									
19 Corrective Actions Verified QAR _____ Date _____		20 Closure Approved by: QADD _____ Date _____									

**Response to CAR  
YM-92-070**

**1. Response**

**1A. Remedial Actions**

No remedial actions will be taken to correct the specific condition. SNL feels that there would be no benefit in trying to generate DRC sheets after the fact. A review of the ICNs in questions has been performed and each ICN (copies attached) is considered to be minor in nature (with the exception of ICN 01 to TP 201) and noncontroversial. Additionally, each ICN was reviewed and approved by no less than four SNL YMP personnel. It is SQL's opinion that this review and approval clearly demonstrate that any comments generated during the process were satisfactorily resolved prior to the issue of the ICNs.

**1B. Investigative Action**

A review of TPs disclosed an additional 11 ICNs without DRC sheets. As stated in Item 1A, all the ICNs (18 total) are considered to be minor in nature, with the exception of ICN 01 to TP 201. The review disclosed 14 of the ICNs were done by the same person in a relatively short time period. This person is no longer on the Project.

Further investigation has disclosed that several procedure cross-references are confusing; for example, one requires DRCs to be maintained while another makes it optional. In addition, conflicting direction has been provided in that the Project Records Management Plan, Section A.3.4, last paragraph, states in part, "Drafts, comments, and resolutions for both DOE and other Participant procedures may be retained by the organization, but do not need to be submitted to CFR for YMP retention." Therefore, some personnel simply discarded DRCs after comment resolution.

**1C. N/A for this CAR.**

**1D. Corrective Action to Preclude Recurrence**

SNL YMP Quality Assurance Implementing Procedures will be revised to provide clear, concise requirements on the use and maintenance of DRCs.

**2. Responsible Individual and Completion Date**

Item 1B — Complete

Item 1D — J. C. Friend

Estimated completion date — December 24, 1992

**3. Response Approved:**

John T. Holmes for      9/24/92  
Manager, YMP Management Dept      Date

*Letter dated 9/24/92 - Bleyman to Spencer*

**Amended Response to CAR  
YM-92-070**

**1. Response**

1A. A memo will be placed in each applicable TP <sup>record file</sup> folder to document that DRC sheets are not available for the affected ICNs and to reference this CAR.

*PRR*  
*10/8/92*

1B. No Change

1C. No Change

1D. No Change

**2. Responsible Individual and Completion Date**

Item 1A: J. C. Friend

Estimated Completion Date — November 2, 1992

**3. Response Approved:**

Thomas E Bleyman  
Manager  
YMP Management Department

10/11/92  
Date

*Str dtd 10/11/92 - Bleyman to Spencer*