



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

WBS 1.2.9.3

OCT 13 1992

Carl P. Gertz, Project Manager, YMP, NV

ISSUANCE OF CORRECTIVE ACTION REQUESTS (CAR) YM-93-001 THROUGH YM-93-004
RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT
YMP-92-24 OF YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT OFFICE

Enclosed are CAR YM-93-001 through YM-93-004 generated as a result of YMQAD
Audit YMP-92-24.

Please identify the corrective actions to be taken and implemented to
correct the deficiencies. CAR Continuation Sheets and instructions for
completion have been provided. Send the originals of your responses to
YMQAD, attention Nita J. Brogan. Responses to the CAR are due 20 working
days from the date of this letter. Extensions to due dates must be
requested in writing with appropriate justification prior to the due dates.

If you have any questions, please contact either Robert B. Constable at
794-7945 or John S. Martin at 794-7881.

R.E. Spence

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-328

Enclosure:

CAR YM-93-001 thru YM-93-004

cc w/encl:

K. R. Hooks, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
J. D. Verden, M&O/TRW, Las Vegas, NV
J. W. Estella, SAIC, Las Vegas, NV, 517/T-22
J. H. Rusk, MACTEC, Las Vegas, NV
B. J. Verna, YMP, NV

cc w/o encl:

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

YMP-5

9210200403 921013
PDR WASTE PDR
WM-11

ADD: KIM HOOKS

Ltr. Encl.

ENCLOSURE

102.7
WM-11
NH03

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

8 CAR NO.: YM-93-001
DATE: 10/6/92
SHEET: 1 OF 1
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document AP-3.5Q, Revision 1		2 Related Report No. YMP-92-24	
3 Responsible Organization YMPO		4 Discussed With C. Gertz/W. Wilson/B. Cruz	
5 Requirement: AP-3.5Q, Revision 1, Paragraph 4.0, Step 4 (A), requires that if a change is scientific, design or quality-affecting, that a technical evaluation be performed by the affected participant (i.e., YMPO or other participant) per the participants' procedure or the requirements identified within Attachment 4 of AP-3.5Q.			
6 Adverse Condition: Contrary to the above, during Audit YMP-92-24, no objective evidence could be produced to show that the technical evaluations had been performed for the following Field Change Requests (FCRs): <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;">FCR 92/089 FCR 92/058</div> <div style="text-align: center;">FCR 92/092 FCR 92/061</div> </div>			
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 type="checkbox"/> Root Cause Determination			
13 Recommended Actions: Identify the remedial actions to be taken to correct the deficiencies note in Block 6. Investigate the program processes, activities or documentation to determine the extent and depth of similar conditions as noted in Block 6. Identify these deficiencies and provide the measures to correct them.			
7 Initiator Sam H. Horton <i>Sam Horton</i> Date <u>10/06/92</u>		14 Issuance Approved by: QADD <i>[Signature]</i> Date <u>10/8/92</u>	
15 Response Accepted QAR _____ Date _____		16 Response Accepted QADD _____ Date _____	
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

Format for Corrective Action Response

The CAR response shall include the following information:

1. Corrective Action Response for CAR # _____
 - A. Remedial Action - Actions taken to correct specific deficiencies noted.
(Required for all CARs)
 - B. Investigative Action - Actions taken to determine the extent of the condition.
(Required for all significant conditions adverse to quality or any Condition Adverse to Quality if requested by OQA)
 - C. Root Cause Determination - Identification of the root cause of the condition.
(Required for all significant conditions adverse to quality or any Condition Adverse to Quality if requested by OQA)
 - D. Corrective Action to Preclude Recurrence - Actions taken to address the root cause and preclude recurrence of the condition.
(Required for all significant conditions adverse to quality or any Condition Adverse to Quality if requested by OQA)
2. For each action above, identify the name of the individual assigned responsibility for completion and the anticipated (or actual, if complete) completion date.
3. Response Approved: _____ Date: _____
Responsible Manager

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

CAR NO. _____
DATE: _____
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CORRECTIVE ACTION REQUEST (Continuation Page)

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

8 CAR NO.: YM-93-002
DATE: 10/6/92
SHEET: 1 OF 1
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document AP-5.24Q, Revision 0		2 Related Report No. YMP-92-24	
3 Responsible Organization YMP0		4 Discussed With C. Gertz/W. Wilson/B. Cruz	
5 Requirement: AP-5.24Q, Revision 0, Paragraph 4.0, Step 5 and Step 5 Note, require the submittal of as-built drawings and specifications from the affected participants to the CCB for incorporation into the technical baseline. In addition, the CCB is required to notify the Architect Engineer (A/E) of the CCB's acceptance of as-built drawings and specifications, and the CCB Secretary is required to send as-builts to the LRC and the DCC.			
6 Adverse Condition: Contrary to the above, during Audit YMP-92-24, the following deficient conditions were identified: 1. Trench 14 as-built drawings and specifications were submitted to the CCB but were not shown in the technical baseline as being as-built. 2. The CCB did not notify the A/E of the CCB's acceptance of Trench 14 as-built drawings and specifications. 3. The Trench 14 as-built drawings and specifications were not sent to the LRC (however, investigation has provided evidence that they were sent to the DCC).			
9 Does a significant condition adverse to quality exist? Yes <u> </u> No <u>X</u> If Yes, Circle One: A B C		10 Does a stop work condition exist? Yes <u> </u> 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 type="checkbox"/> Root Cause Determination			
13 Recommended Actions: Identify the remedial actions to be taken to correct the deficiencies note in Block 6. Investigate the program processes, activities or documentation to determine the extent and depth of similar conditions as noted in Block 6. Identify these deficiencies and provide the measures to correct them.			
7 Initiator Sam H. Horton <i>Sam Horton</i> Date <u>10/06/92</u>		14 Issuance Approved by: QADD <i>R.C. Sanchez</i> Date <u>10/8/92</u>	
15 Response Accepted QAR _____ Date _____		16 Response Accepted QADD _____ Date _____	
17 Amended Response Accepted QAR _____ Date _____		18 Amended Response Accepted QADD _____ Date _____	
19 Corrective Actions Verified QAR _____ Date _____		20 Closure Approved by: QADD _____ Date _____	

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PAGE: _____ OF _____
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CORRECTIVE ACTION REQUEST (Continuation Page)

Format for Corrective Action Response

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2. For each action above, identify the name of the individual assigned responsibility for completion and the anticipated (or actual, if complete) completion date.
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Responsible Manager

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8 CAR NO.: YM-93-003
DATE: 10/6/92
SHEET: 1 OF 1
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document AP-3.6Q, Revision 1		2 Related Report No. YMP-92-24	
3 Responsible Organization YMPO		4 Discussed With C. Gertz/B. Cruz	
5 Requirement: AP-3.6Q, Revision 1, Paragraph 5.1.3.2 requires that data that has not been (1) verified or (2) validated per NUREG 1298 or (3) is dependent on software that has not been validated, is identified and tracked in the same manner as to be determined data (TBD). Paragraph 5.1.3.1 requires that to be determined data (TDB) must have a scheduled resolution date and be tracked in a log associated with the document which contains the data to be verified.			
6 Adverse Condition: Contrary to the above; Table 1 (page TBV-3) of Document YMP/CM-0006, Revision 2, does not delineate a scheduled resolution of data to be verified.			
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 type="checkbox"/> Root Cause Determination			
13 Recommended Actions: Identify the remedial actions to be taken to correct the deficiency note in Block 6. Investigate the program processes, activities or documentation to determine the extent and depth of similar conditions as noted in Block 6. Identify these deficiencies and provide the measures to correct them.			
7 Initiator Sam H. Horton <i>Sam Horton</i> Date <u>10/6/92</u>		14 Issuance Approved by: QADD <i>RC. Spence</i> Date <u>10/8/92</u>	
15 Response Accepted QAR Date		16 Response Accepted QADD Date	
17 Amended Response Accepted QAR Date		18 Amended Response Accepted QADD Date	
19 Corrective Actions Verified QAR Date		20 Closure Approved by: QADD Date	

Format for Corrective Action Response

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Responsible Manager

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CAR NO. _____
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CORRECTIVE ACTION REQUEST (Continuation Page)

8 CAR NO.: YM-93-004
DATE: 10/6/92
SHEET: 1 OF 2
QA

1 Controlling Document QAPD, Revision 3, and AP-1.18Q, Revision 1		2 Related Report No. YMP-92-24	
3 Responsible Organization YMFO		4 Discussed With C. Gertz	
5 Requirement: QAPD, Revision 3, Section 17.0, Paragraph 17.3, states in part: "Documents designated to become records are to be legible, identifiable, accurate, complete, reproducible, microfilmable, and appropriate to the work accomplished." AP-1.18Q, Revision 1, Paragraph 5.6, states in part: "Prepare the individual records or records package in accordance with Appendix A...." Appendix A, Item 1, requires that draft documents be stamped "DRAFT" on their first page of the draft document.			
6 Adverse Condition: Contrary to the above, the following records deficiencies were found: Records or portions of records were illegible: NNA 920807.0066, Study Plan 8.3.1.17.4.5 NNA 920807.0076, Job Package 92-12 Records package was incomplete (missing pages): NNA 920807.0076, Job Package 92-12 Record not identified correctly (not stamped "DRAFT"): NNA 920807.0066, Draft Study Plan 8.3.1.17.4.5 (Continued)			
9 Does a significant condition adverse to quality exist? Yes <u>X</u> No <u> </u> If Yes, Circle One: A B C		10 Does a stop work condition exist? Yes <u> </u> 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: Identify the remedial actions to be taken to correct the deficiencies noted in Block 6. Investigate the program processes, activities or documentation to determine the extent and depth of similar conditions as noted in Block 6. Identify these deficiencies and provide the measures to correct them. (Continued)			
7 Initiator <u>A. L. Arceo</u> Amelia I Arceo Date <u>10/6/92</u>		14 Issuance Approved by: QADD <u>R. E. Spencer</u> Date <u>10/8/92</u>	
15 Response Accepted QAR Date		16 Response Accepted QADD Date	
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8 CAR NO.: YM-93-004
DATE: 10/6/92
SHEET: 2 OF 2
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CORRECTIVE ACTION REQUEST (Continuation Page)

6 Adverse Condition (continued)

DISCUSSION:

While it has always been an upper-tier requirement for records to be legible, it was realized (CAR YM-91-065) that certain "one of a kind records" with portions which were illegible, should be retained. This was only to be utilized for unique records where these illegible portions could not be transcribed or enhanced, and it was thought that those portions which were legible would be of benefit to the Project. However, in the allowance of a system to provide a means by which these unique records could be transmitted into the Records Center, it has become standard practice among DOE and Participants to abuse the system.

In the conduct of this audit, it was found that the statement, "I have reviewed this record/records package and it is adequate for its intended purpose. All blanks are intentional. Any illegible, uncorrected, or incomplete information does not impact future, in-process, or completed work" is being utilized "carte blanche" for records and not just for those unique "One of a kind records" which contained deficiencies which would not meet the requirements of the QAPD and NQA-1.

13 Recommended Action(s) (continued)

Identify the cause of the condition and the planned corrective action to prevent recurrence.

NOTE: Response to the above must include and consider all participants as the deficiencies, as detected herein, is considered Project-wide.

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Responsible Manager

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CAR NO. _____
DATE: _____
PAGE: _____ OF _____
QA

CORRECTIVE ACTION REQUEST (Continuation Page)