



Department of Energy
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 101 Convention Center Drive
 Las Vegas, NV 89109

EVALUATION OF RESPONSES TO CORRECTIVE ACTION REQUEST (CAR) YM-92-075 AND YM-92-076 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-92-23 OF TECHNICAL AND MANAGEMENT SUPPORT SERVICES

The YMQAD staff has evaluated the responses to CARs YM-92-075 and YM-92-076. The amended response to CAR YM-92-075 and the response to CAR YM-92-076 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 J. Brogan, Science Applications International Corporation, Las Vegas, Nevada.

If you have any questions, please contact either Robert B. Constable at 794-7945 or James Blaylock at 794-7913.

R.E. Spence

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-720

Enclosure:
 CAR YM-92-075 and YM-92-076

cc w/encl:

- ~~K. R. Hooks, NRC, Washington, DC~~
- S. W. Zimmerman, NWPO, Carson City, NV
- J. H. Rusk, MACTEC, Las Vegas, NV
- D. K. Chandler, SAIC, Las Vegas, NV
- J. R. Gonzales, SAIC, Las Vegas, NV
- J. B. Harper, SAIC, Las Vegas, NV

cc w/o encl:

- J. W. Gilray, NRC, Las Vegas, NV
- N. J. Brogan, SAIC, Las Vegas, NV

Add: K. Hooks
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 PDR WASTE
 WM-11 PDR

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RADIOACTIVE WASTE MANAGEMENT
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WASHINGTON, D.C.**

8 CAR NO.: YM-92-075
DATE: 9-18-92
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CORRECTIVE ACTION REQUEST

1 Controlling Document TEMSS SP 1.23, REV. 4		2 Related Report No. Audit YMP-92-23	
3 Responsible Organization TEMSS		4 Discussed With F. Lofftus, J. Harper	
5 Requirement: SP 1.23, Rev. 4, Paragraph 5.7, Conditional Release, details the initiation, review, approval, tracking, and closure process for conditional release of an item.			
6 Adverse Condition: NCR 92-027 for Europium-152 source had a Conditional Release indicated in Block 10, which included the number. For a number to be indicated, the Conditional Release had to go through three reviews and approvals by the DM, APM, and QAM. The NCR was closed on 9/10/92. The conditional release was never actually issued.			
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 type="checkbox"/> Extent of Deficiency <input checked="" type="checkbox"/> Preclude Recurrence <input checked="" type="checkbox"/> Root Cause Determination			
13 Recommended Actions:			
7 Initiator J Blaylock Date 9/22/92		14 Issuance Approved by: OADD <i>[Signature]</i> Date 9/28/92	
15 Response Accepted QAR J Blaylock Date 11/2/92		16 Response Accepted OADD <i>[Signature]</i> Date 11/5/92	
17 Amended Response Accepted QAR Date		18 Amended Response Accepted OADD Date	
19 Corrective Actions Verified QAR Date		20 Closure Approved by: OADD Date	

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CORRECTIVE ACTION REQUEST (Continuation Page)

RESPONSE TO CAR YM-92-075

A. Remedial Action

The mistaken indication of a Conditional Release in Block #10 of this NCR was investigated and corrected by Mr. Fred H. Lofftus of the T&MSS QA Staff immediately upon identification by the auditor on 9/14/92, the first day of DOE Audit YMP-92-23. As a result of investigations described below, no additional remedial action is required.

B. Investigative Action

NCR-92-027 was initiated on 7/31/92 to track a residual matter resulting from the issuance of DOE CAR YM-92-020. NCR-92-027 was resolved on 9/10/92 and the submittal of the record package was not yet effected as of 9/14/92. As a result, the correction to Block #10 of the NCR was effected prior to the submittal of the official record package to the Local Records Center (LRC).

In addition, all closed NCR's dating from 6/22/90 (82) were examined by the T&MSS QA Staff for associated Conditional Releases. In addition to NCR-92-027, 26 NCR's were found to require Conditional Release (Block #10 marked "yes"). The investigative action was completed on 10/13/92 by Mr. F. H. Lofftus.

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NCR's with Conditional Releases examined:

NCR-90-001 = CR-90-001-1	NCR-90-002 = CR-90-002-1
NCR-90-003 = CR-90-003-1	NCR-90-006 = CR-90-006-1
NCR-91-001 = CR-91-001-1	NCR-91-002 = CR-91-002-1
NCR-91-003 = CR-91-003-1	NCR-91-004 = CR-91-004-1
NCR-91-005 = CR-91-005-1	NCR-91-006 = CR-91-006-1
NCR-91-007 = CR-91-007-1	NCR-91-008 = CR-91-008-1
NCR-91-009 = CR-91-009-1	NCR-91-023 = CR-91-023-1
NCR-91-025 = CR-91-025-1	NCR-91-026 = CR-91-026-1
NCR-91-027 = CR-91-027-1	NCR-91-028 = CR-91-028-1
NCR-91-029 = CR-91-029-1	NCR-91-031 = CR-91-031-1
NCR-91-033 = CR-91-033-1	NCR-91-040 = CR-91-040-1
NCR-92-002 = CR-92-002-1	NCR-92-010 = CR-92-010-1
NCR-92-024 = CR-92-024-1	NCR-92-026 = CR-92-026-1

In all cases the NCR's and associated Conditional Releases were found to be free of the adverse condition described in the subject CAR. Thus, the condition documented by CAR YM-92-075 represents an isolated instance of noncompliance.

C. Root Cause Determination

The root cause of this isolated instance is human error.

The error was caused by a mistake on the part of the preparer who mistakenly placed an "X" in the "Yes" block of Block #10 of the NCR instead of the "No" block. This was an obvious mistake since the item involved in this NCR is a radioactive source procured in 1987 via Purchase Order #11-880153-54 and received at Area 25 of the NTS in 1988. This item has remained under lock and key control in Area 25.

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In addition, this isolated instance was not recognized during the subsequent reviews conducted during the course of the processing and closure of this document.

D. Corrective Action to Preclude Recurrence

T&MSS QA staff members have been instructed to exercise care and caution in the preparation, processing, review, and closure of NCR's. These instructions have been imparted to the QA Staff by J. B. Harper, T&MSS QA Manager, in staff meetings since 9/14/92. In addition, a QA memorandum, dated 10/26/92 on behalf of Mr. Harper, outlines and documents these instructions and cautions to the staff. No additional action should be required to preclude recurrence of this condition.

Prepared by:



R. R. Rinderman
T&MSS QA Staff

Date: 10-27-92.

Approved by:



M. D. Voegele
T&MSS Project Manager

Date: 10-27-92

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CORRECTIVE ACTION REQUEST (Continuation Page)

AMENDED RESPONSE TO CAR YM-92-075

A. Remedial Action

The mistaken indication of a Conditional Release in Block #10 of this NCR was investigated and corrected by Mr. Fred H. Lofftus of the T&MSS QA Staff immediately upon identification by the auditor on 9/14/92, the first day of DOE Audit YMP-92-23. As a result of investigations described below, no additional remedial action is required.

B. Investigative Action

NCR-92-027 was initiated on 7/31/92 to track a residual matter resulting from the issuance of DOE CAR YM-92-020. NCR-92-027 was resolved on 9/10/92 and the submittal of the record package was not yet effected as of 9/14/92. As a result, the correction to Block #10 of the NCR was effected prior to the submittal of the official record package to the Local Records Center (LRC).

In addition, all closed NCR's dating from 6/22/90 (82) were examined by the T&MSS QA Staff for associated Conditional Releases. In addition to NCR-92-027, 26 NCR's were found to require Conditional Release (Block #10 marked "yes"). The investigative action was completed on 10/13/92 by Mr. F. H. Lofftus.

lta dtd 10/30/92 - L92-4120

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NCR's with Conditional Releases examined:

NCR-90-001 = CR-90-001-1	NCR-90-002 = CR-90-002-1
NCR-90-003 = CR-90-003-1	NCR-90-006 = CR-90-006-1
NCR-91-001 = CR-91-001-1	NCR-91-002 = CR-91-002-1
NCR-91-003 = CR-91-003-1	NCR-91-004 = CR-91-004-1
NCR-91-005 = CR-91-005-1	NCR-91-006 = CR-91-006-1
NCR-91-007 = CR-91-007-1	NCR-91-008 = CR-91-008-1
NCR-91-009 = CR-91-009-1	NCR-91-023 = CR-91-023-1
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NCR-91-029 = CR-91-029-1	NCR-91-031 = CR-91-031-1
NCR-91-033 = CR-91-033-1	NCR-91-040 = CR-91-040-1
NCR-92-002 = CR-92-002-1	NCR-92-010 = CR-92-010-1
NCR-92-024 = CR-92-024-1	NCR-92-026 = CR-92-026-1

In all cases the NCR's and associated Conditional Releases were found to be free of the adverse condition described in the subject CAR. Thus, the condition documented by CAR YM-92-075 represents an isolated instance of noncompliance.

C. Root Cause Determination

The root cause of this isolated instance is human error in following the process described in the procedure.

The error was caused by a mistake on the part of the preparer who mistakenly placed an "X" in the "Yes" block of Block #10 of the NCR instead of the "No" block. This was an obvious mistake since the item involved in this NCR is a radioactive source procured in 1987 via Purchase Order #11-880153-54 and received at Area 25 of the NTS in 1988. This item has remained under lock and key control in Area 25.

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In addition, this isolated instance was not recognized during the subsequent reviews conducted during the course of the processing and closure of this document, i.e., during the processing of the NCR, T&MSS failed to implement the procedure steps and never generated a Conditional Release (CR) form and therefore, there was no C.R. to void.

D. Corrective Action to Preclude Recurrence

T&MSS QA staff members have been instructed to exercise care and caution in the preparation, processing, review, and closure of NCR's. These instructions have been imparted to the QA Staff by J. B. Harper, T&MSS QA Manager, in staff meetings since 9/14/92. In addition, a QA memorandum, dated 10/26/92 on behalf of Mr. Harper, outlines and documents these instructions and cautions to the staff. No additional action should be required to preclude recurrence of this condition.

All actions necessary to close this matter have been completed.

Prepared by:  Date: 10-30-92
R. R. Rinderman
T&MSS QA Staff

Approved by:  Date: 10-30-92
M. D. Voegele
T&MSS Project Manager

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8 CAR NO.: YM-92-076
DATE: 9-18-92
SHEET: 1 OF 1
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document T&MSS SP 1.37, Rev. 5		2 Related Report No. Audit YMP-92-23	
3 Responsible Organization T&MSS		4 Discussed With James Harper	
5 Requirement: SP 1.37, Rev. 5, Paragraph 5.7 and 5.7.1 detail the responsibilities in evaluating responses and verification of corrective action and closure, respectively.			
6 Adverse Condition: QFR 92-018 identified deficient conditions in three part, elements A, B, and C. The response to this QFR addressed only element A. Element B had been corrected, although neither the response or verification of closure documented the action; no actions were taken/documentated with respect to element C. This is a repetitive deficiency, see YM-91-064			
9 Does a significant condition adverse to quality exist? Yes <u>X</u> No ___ If Yes, Circle One: <u>(A)</u> 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:			
7 Initiator <i>J Blaylock</i> Date <u>9/21/92</u>		14 Issuance Approved by: QADD <i>RC Spence</i> Date <u>9/28/92</u>	
15 Response Accepted QAR <i>J Blaylock</i> Date <u>10/2/92</u>		16 Response Accepted QADD <i>RC Spence</i> Date <u>11/5/92</u>	
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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CORRECTIVE ACTION REQUEST (Continuation Page)

CAR YM-92-076 Response

A. Remedial Action

A. L. Temple of the T&MSS QA staff will process a revision to QFR 92-018 in order to provide the information that is missing from the initial issue of the QFR to allow appropriate closure. This activity will be accomplished by 11/2/92 in accordance with the provisions of SP-1.37, Rev. 5, Pg. 8, Par. 5.10. Closure of the matter is expected by 11/16/92.

No additional remedial action is required as outlined below in Section B, Investigative Action.

B. Investigative Action

T&MSS QA staff members F. H. Lofftus and A. L. Temple performed an investigation of 60 closed QFR's generated during the time frame of 4/23/91 thru 7/30/92. As a result of this investigation, it was determined that there were no other instances of failure to assure that all elements of deficient conditions were addressed by corrective action response.

In addition, as a result of our investigation of the errors associated with QFR 91-016 (as referenced in CAR YM 91-064) as compared with those errors associated with QFR 92-018 (as referenced in CAR YM-92-076), our conclusion is that the specific closure issues described in these two CAR's are dissimilar in nature. While QFR 91-016 describes an issue concerned with failure to conduct an adequate field verification of M&TE and Operating Equipment List data; CAR 92-076 describes an issue concerned with failure to assure the completeness of a Corrective Action response.

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C. Root Cause Determination

The root cause of this CAR is inattention to detail by T&MSS QA staff who performed the evaluation and closure of QFR 92-018.

D. Corrective Action to Preclude Recurrence

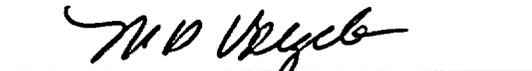
T&MSS QA staff members have been instructed to exercise care and caution in the evaluation and closure of QFR's. These instructions have been imparted to the QA Staff by Mr. J. B. Harper, T&MSS QA Manager, in staff meetings since 9/14/92. In addition, a QA memorandum, dated 10/26/92 on behalf of Mr. Harper, outlines and documents these instructions and cautions to the staff. The procedures are clear on the methodology for closure. No additional corrective action to preclude recurrence is required.

Prepared by:


R. R. Rinderman
T&MSS QA Staff

Date: 10-27-92.

Approved by:


M. D. Voegele
T&MSS Project Manager

Date: 10-27-92