



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

WBS 1.2.11  
 QA: N/A

JUN 09 1993

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 for Yucca Mountain  
 Site Characterization Project  
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 Bank of America Center, Suite P-110  
 101 Convention Center Drive  
 Las Vegas, NV 89109

EVALUATION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-93-037  
 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT  
 YMP-93-07 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT AND  
 OPERATING CONTRACTOR (SCP: N/A)

The YMQAD staff has evaluated the amended response to CAR YM-93-037. 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 794-7945 or Richard E. Powe at 794-7749.

Richard E. Spence, Director  
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-4553

Enclosure:  
 CAR YM-93-037

cc w/encl:  
 Trudy Wood, HQ (RW-52) FORS  
 K. R. Hooks, NRC, Washington, DC  
 S. W. Zimmerman, NWPO, Carson City, NV  
 R. J. Brackett, M&O/Duke, Vienna, VA  
 R. L. Robertson, M&O/TRW, Vienna, VA  
 J. A. Jackson, M&O/TRW, Las Vegas, NV

cc w/o encl:  
 J. W. Gilray, NRC, Las Vegas, NV  
 N. J. Brogan, QATSS, Las Vegas, NV

9306210249 930609  
 PDR WASTE  
 WM-11 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-93-037  
DATE: 3/12/93  
SHEET: 1 OF 2  
QA

**CORRECTIVE ACTION REQUEST**

1 Controlling Document CRWMS M&O QAPD, Revision 3		2 Related Report No. Audit YMP-93-07	
3 Responsible Organization CRWMS M&O-Nevada		4 Discussed With L. D. Foust, J. Jackson	
5 Requirement: CRWMS M&O QAPD, Revision 3, Section 5.1 states in part:  "....The M&O Quality Administrative Procedures (QAPs) and Implementing Line Procedures (ILPs) incorporate the committed requirements from the applicable sections of the QARD. QA ensures that all applicable quality assurance requirements are addressed prior to approval...."			
6 Adverse Condition: The CRWMS M&O Implementing Line Procedures (ILPs) do not meet some of the requirements of the CRWMS M&O QAPD and in some instances do not reflect current practice. Examples of ILPs that are inadequate or do not reflect current practice that were found during Audit YMP-93-07 are:  1. NSP-6-1, Revision 1, PCNs P01 and P02, Yucca Mountain Site Office: Document Control and Records Center: Document Control Operations  Paragraph 5.1.6.1 states, "Upon receipt of an approved master of a design document revision, the DRC staff shall destroy all hard copies of the superceded or obsolete (old) documents, including applicable incorporated change documents."  CRWMS M&O personnel were not destroying the hard copies of the superceded or obsolete document. Instead they are marking the copies as obsolete and keeping them for reference by field personnel. The documents are removed once the activity associated with the Job Package is completed and the Job Package is submitted to the Central Records facility. The ILP needs to be revised to reflect this current practice.			
9 Does a significant condition adverse to quality exist? Yes <u>X</u> No ___ If Yes, Circle One: A <u>(B)</u> 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 work 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) Correct the deficiencies identified; 2) Screen other ILPs to determine the extent of the deficiency; 3) determine if M&O personnel are sufficiently trained regarding working to approved procedures and what to do if a procedure needs to be revised; 4) determine root cause(s); and 5) take action to prevent recurrence.			
7 Initiator: <u>J. Blaylock/Rj Powe</u> <u>R. Powe</u> Date <u>3/15/93</u>		14 Issuance Approved by: QADD <u>R. Spence</u> Date <u>3/15/93</u>	
15 Response Accepted QAR <u>R. Spence</u> <u>MR 6/4/93</u> Date <u>6/4/93</u>		16 Response Accepted QADD <u>NA RSP 6/4/93</u> Date	
17 Amended Response Accepted QAR <u>R. Spence</u> Date <u>6/4/93</u>		18 Amended Response Accepted QADD <u>R. Spence</u> Date <u>6/8/93</u>	
19 Corrective Actions Verified QAR Date		20 Closure Approved by: QADD Date	

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**CORRECTIVE ACTION REQUEST (Continuation Page)**

6 Adverse Condition (continued)

2. NSP-17-1, Revision 1, Yucca Mountain Site Office: Document and Records Center; Record Services Operations

a. CRWMS M&O QAPD, Revision 3, Section 17.6 states in part, "Records are controlled from the time they are completed until they are stored in predetermined locations that meet the requirements of the OCRWM QARD. The storage procedure includes:

.....  
f. The method for maintaining control of and accountability for records removed from the storage area...."

NSP-17-1, Revision 1, does not provide a method for controlling documents in temporary storage that are returned to the Record Source.

b. NSP-17-1, Revision 1, paragraph 5.1.8.1 states in part, "...The DRC records vault complies with applicable QA requirements to prevent loss, damage from moisture, temperature, pressure, excessive light, electromagnetic fields, and other hazards.

NSP-17-1 does not provide acceptance criteria for the prevention measures required, e.g. there is no criteria for what constitutes excessive light, electromagnetic fields, or other hazards.

3. General, all ILPs

CRWMS M&O QAPD, Revision 3, Section 2.1.2 states in part, "This QAPD details the M&O organizational structure, quality-affecting responsibilities, interfaces...." and Section 2.1.4 states in part, "M&O Implementing Line Procedures are used to control quality-affecting activities where detailed implementing instructions are restricted to an M&O geographic location or individual functional area...."

M&O ILPs do not reference interfacing Yucca Mountain Site Characterization Project Office Administrative Procedures such as AP 3.5Q and AP 6.17Q.

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**CORRECTIVE ACTION REQUEST (Continuation Page)**

12. Required Actions; ~~Response~~ to CAR YM 93-037  
*RESPONSE*  
*mc 4/14/93*
- 12.1. Adverse Condition was: The DRC was not destroying the hard copies of superseded or obsolete documents, until the next revision of the document.
- A. The initial intent of the procedure was to make room for other obsolete documents. The procedure is due to be changed to no longer reflect this requirement.
  - B. A review of this revealed that Quality Assurance work was not affected.
  - C. Root cause of this was storage requirements, however, the staff of the DRC has occasionally referred to the obsolete documents for historical purposes.
  - D. The procedure will be changed by 5/15/93 to modify the requirement as previously identified in paragraph "A" above.
- 12.2a Adverse Condition was: M&O ILP/NSP-17-1 does not provide a means of controlling records in temporary storage, that have been returned to the record source.
- A. A modification to the form used by the DRC Staff to account for records stored in the vault, was made on the spot during the audit to document this action. The procedure will be modified to reflect the new process.
  - B. A search of the requirement revealed that no records segments were requested or returned in the past, however, we do recognize the need for such action and will modify NSP-17-1 to govern it.
  - C. Root Cause of the situation was the procedure did not provide for an action which had not yet occurred.
  - D. Corrective action is being taken as previously stated. The form used for records accountability has been modified and the procedure will be revised to provide.

*Ltr dtd 4/14/93 - LV. QA. BRJ. 04/93-079*

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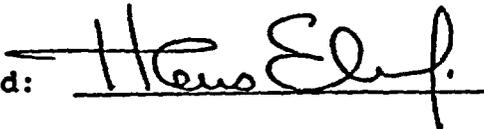
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12.2b Adverse Condition was: NSP-17-1 does not provide a single storage records vault.

- A. The condition of non-compliance is non-existent. Sub-paragraph 5.1.8.1, NSP-17-1 states, "The DRC staff shall store and protect QA records that have been received at the DRC, in a temporary storage records vault."
- B. Investigation concluded the audit team focused on a "Note" below the above mentioned sub-paragraph. This "Note" will be removed to avoid any further confusion.
- C. Root cause was difference of interpretation between the originator/users and the audit team, of the before mentioned subparagraph and the "Note".
- D. This "Note" will be removed from the procedure no later than 5/15/93.

Response Approved:



Date:

4/7/93

Hans Ebner  
Document Control Manager

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**CORRECTIVE ACTION REQUEST (Continuation Page)**

Response to CAR #YM-93-037

A. Remedial Action

1. As identified in previous response.
2. As identified in previous response.
3. The Implementing Line Procedures do reference the DOE Administrative Procedures when necessary (Example: Procedure MGP-15-1 references AP-5.27Q; Procedure NSP-17-1 references AP-1.18Q and AP-6.22Q; Procedure MGP-7-1 references AP-5.1Q and AP-5.26).

B. Extent of Deficiency

1. & 2. As identified in previous response.
3. The M&O has included reference to YMP procedures when interfaces occur which need to be described in M&O procedures (reference Item A.3 above). There may be instances where additional M&O procedures need to be written to interface with YMP procedures. (See Action to Preclude Recurrence for additional information).

C. Root Cause

1. & 2. The root cause of these items is the specification of requirements which did not accurately describe the work practices and were in excess of QARD requirements.
3. The M&O is identifying, where appropriate, when YMP procedures should be included in M&O procedures as identified in A.3 above. Not all M&O procedures are intended to interface with YMP procedures. There have been cases when the M&O presumed a YMP procedure could be implemented without additional guidance and did not write a separate procedure to interface with the DOE procedure.

*Stratton LV. QA. BRJ. 05/93-119*

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D. Action To Preclude Recurrence

1. & 2. These procedures have been revised to reflect current work practices.

3. M&O QA will review the DOE procedures to determine if other interfacing procedures may need to be written. This action will be accomplished by June 11, 1993. Appropriate M&O Management will be informed of our results so an evaluation can be made to determine if any additional procedures will be developed.

Response Approved: *Robert Justice* Date: 5-26-93