



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

Carl P. Gertz, Project Manager, YMP, NV

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-93-044
RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT
YMP-93-09 (SCP: N/A)

The YMQAD staff has evaluated the response to CAR YM-93-044. The response has been determined to be unsatisfactory because corrective action to preclude recurrence for adverse Conditions 1 and 6 does not specify who is responsible for completion of the actions and by what date actions will be completed.

An amended response is required to be submitted to this office within ten working days of the date of this letter. Send the original of your response to Nita J. Brogan, Science Applications International Corporation, Las Vegas, Nevada. If an extension to the due date is necessary, it must be requested in writing, with appropriate justification, prior to that date.

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

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-4554

Enclosure:
CAR YM-93-044

cc w/encl:

K. R. Hooks, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
J. W. Estella, SAIC, Las Vegas, NV
P. A. Jones, M&O/TRW, Las Vegas, NV
A. V. Gil, YMP, NV
B. J. Verna, YMP, NV

cc w/o encl:

J. W. Gilray, NRC, Las Vegas, NV
S. D. Johnson, PSDO/REECo, Las Vegas, NV
N. J. Brogan, QATSS, Las Vegas, NV
C. C. Warren, QATSS, Las Vegas, NV

9306210269 930609
PDR WASTE
WM-11 PDR

YMP-5

100100

ADD: Ken Hooks
Wr. Encl.
1 1

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WM-11
NH03

ORIGINAL
THIS IS A RED STAMP

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

8 CAR NO.: YM-93-044
DATE: 4/12/93
SHEET: 1 OF 2
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document QAAP 2.6, Revision 2		2 Related Report No. Audit YMP-93-09	
3 Responsible Organization YMPO		4 Discussed With T. Fortner/R. Barton	
5 Requirement: <ol style="list-style-type: none">Section 5.2.2 - Team members shall be trained on the requirements of the OCRWM QARD, QAPD, and this procedure.Section 6.1.3 - Upon notification that a readiness review is required, the Responsible Director shall...appoint a Readiness Review Chairperson.Section 6.1.6 - The Readiness Review Chairperson shall forward the plan to the Responsible Director for approval.Section 6.2.1 - Team members shall initial and date each attribute that they evaluate,...identifying the Open Item Number for attributes that are not closed.			
6 Adverse Condition: Contrary to the above requirements, the following was found for the Readiness Review for Construction and Construction Support Activities for Exploratory Studies Facility Package 1A: <ol style="list-style-type: none">No objective evidence could be found that indicated Readiness Review team member Bob Morgan had been trained as required.No objective evidence could be found that indicated the Responsible Director's appointment of the Readiness Review Chairperson.No objective evidence could be found that the Readiness Review Plan was forwarded to the Responsible Director for approval or approved by the Responsible Director.The completed Attribute List identified Test Control for REECO as remaining open with no Open Item Number indicated on the Attribute List and no Open			
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: <ol style="list-style-type: none">Perform remedial action to correct adverse conditions.Determine cause of adverse conditions.Perform actions to preclude recurrence of adverse conditions.			
7 Initiator <u>Charles C. Warren</u> Charles C. Warren Date <u>4-12-93</u>		14 Issuance Approved by: <u>Robert B. Countable</u> for Date <u>04-15-93</u> QADD	
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

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CORRECTIVE ACTION REQUEST (Continuation Page)

5 Requirements (continued)

Section 6.2.2 - Team members shall document any attribute remaining open on the Open Item Report (Attachment III).

5. Section 6.3.2 - When the Responsible Director has reviewed and approved the Readiness Review Report, the report and attached Open Item Report shall be distributed to affected organizations.
6. Section 6.3.4 - ...Work shall not proceed beyond any hold point established on the Open Item Report until the closure of the item is approved by the Readiness Review Chairperson.

6 Adverse Condition (continued)

Item Report included in Readiness Review Documentation.

5. No objective evidence could be found that indicated Responsible Director approval of the Readiness Review Report prior to distribution.
6. No objective evidence could be found that closure of any of the 13 Open Item Reports indicating hold points have been approved by the Readiness Review Chairperson although work has proceeded beyond some of these indicated hold points (such as start of ESF Construction).

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CORRECTIVE ACTION REQUEST (Continuation Page)

RESPONSE TO CAR YM-93-044

Condition:

1. No objective evidence could be found that indicated Readiness Review team member Bob Morgan had been trained as required.

Remedial Action:

None Required. Mr. Morgan's function in the review was that of an observer, as evidenced by the fact that his signature does not appear on any of the Review documentation.

Root Cause:

None

Action to Preclude Recurrence:

Though no violation appears to have occurred, training of all personnel associated with a Readiness Review, whether administrative or otherwise, will be conducted for future Readiness Reviews. No further action required.

Condition:

2. No objective evidence could be found that indicated the Responsible Director's appointment of the Readiness Review Chairperson.

Remedial Action:

The appointment was made verbally at the time of the Review. The matter of the appointment of the RR Chair. is covered in a letter, dated 7 APR 93, (attached) from Dr. William Simecka, Division Director, EDD to Carl Gertz, YMP Project Manager. Action complete by Simecka, 7APR93.

Root Cause:

None. The procedure does not require the appointment to be made in writing.

Action to Preclude Recurrence:

The subject procedure, QAAP 2.6, will be amended to require written documentation of appointment of RR Chair. The procedure is under OCRWM, and must be changed by headquarters. The change will be requested by Tom Fortner of YMP, with a completion date of 25JUN93. Completion of

Ltr dtd 5/28/93 - EDD: TIF - 442

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CORRECTIVE ACTION REQUEST (Continuation Page)

the change should be completed 90 days after that date, or 30SEP93.

Condition:

3. No objective evidence could be found that the Readiness Review Plan was forwarded to the Responsible Director for approval or approved by the Responsible Director.

Remedial Action:

The Plan was reviewed by the Responsible Director, and signature authority for the plan was verbally delegated to Tom Fortner. The April 7 letter noted above also contains information regarding this condition. Action complete by Simecka on 7APR93.

Root Cause:

None. While the procedure requires the RR Plan to be forwarded to the Responsible Director, it does not require documentation of this action.

Action to Preclude Recurrence:

The subject procedure, QAAP 2.6, will be amended to require written documentation of the review/approval of RR Plan by the Responsible Director, or his stead. See "Action to Preclude Recurrence" in Condition #1 for responsible party and projected completion date.

Condition:

4. The completed Attribute List identified Test Control for REEC Co as remaining open with no Open Item Number indicated on the Attribute List and no Open Item Report included in Readiness Review documentation.

Remedial Action:

Attribute was checked in error, REEC Co is not responsible for test control. See attached TRW Letter, Kubo to Gertz, dated April 7, 1993. No action required.

Root Cause:

None.

Action to Preclude Recurrence:

None.

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CORRECTIVE ACTION REQUEST (Continuation Page)

Condition:

5. No objective evidence could be found that indicated Responsible Director approval of the Readiness Review Report prior to distribution.

Remedial Action:

The Readiness Review Report was presented at a briefing to the Division Director and approved for distribution verbally. Refer to the attached letter, Simecka to Gertz, dated April 7, 1993 for the action taken on this item. Action complete by Simecka on 7APR93.

Root Cause:

None.

Action to Preclude Recurrence:

The subject procedure, QAAP 2.6, will be amended to require written documentation of the review/approval of RR Report by the Responsible Director, or his stand. See "Action to Preclude Recurrence" in Condition #1 for responsible party and projected completion date.

Condition:

6. No objective evidence could be found that closure of any of the 13 Open Item Reports indicating hold points have been approved by the Readiness Review Chairperson although work has proceeded beyond some of these indicated hold points (such as start of ESF Construction.)

Remedial Action:

Proper records have been completed. Open Items were closed by RR commenter and information relayed to RR Chairperson for action to proceed with work prior to start the subject activity. Records of the RR were in Vienna and were not signed by RR Chairperson for final written closure, and were not completed properly.) Action completed by Fortner on 8APR93.

Root Cause:

The cause was a failure to follow the operative procedure (QAAP 2.6). Specifically, Section 6.3.3, requiring documentation of closure on the forms ie: Sign-off by RR Chairperson.

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CORRECTIVE ACTION REQUEST (Continuation Page)

Action to Preclude Recurrence:

Training of future Readiness Review participants should emphasize the execution of all records through the RR process. No further specific action required for closure of this CAR.

Response Approved:

Edgar H. Hester Jr.
Responsible Manager

Date:

5/28/93



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

WBS 1.2.6
QA: N/A

APR 07 1993


Carl P. Gertz, Project Manager, YMP, NV

EXPLORATORY STUDIES FACILITY CONSTRUCTION SUPPORT READINESS REVIEW OF
SEPTEMBER 14-16, 1992

The purpose of this memorandum is to memorialize specific actions taken by me relative to subject readiness reviews as follows:

1. On July 23, 1992, I verbally appointed Thomas I. Fortner as chairperson for the subject reviews.
2. On September 4, 1992, I reviewed the Readiness Review Plan and directed Mr. Fortner to proceed in accordance with the plan directions. Concurrently, I verbally delegated the authority for signature approval of the plan to Mr. Fortner.
3. On September 22, 1992, I received an Executive Summary briefing on the Readiness Review Report. At that time, I concurred with the initial findings and recommendations, and directed Mr. Fortner to proceed with preparations for presenting the formal report.
4. On October 27, 1992, selected members of the Yucca Mountain Site Characterization Project Office Task Force and I received the final report from the Readiness Review Team. Upon deliberation, I verbally approved the report and directed all respective participants to close all open items and, subsequently, proceed with construction.

If you have any questions, please call me at 794-7933.


William B. Simecka, Director
Engineering & Development Division

EDD:WBS-3650

cc:

A. S. Kubo, M&O/Duke, Las Vegas, NV
T. I. Fortner, YMP, NV



101 Convention Center Drive, Suite 540
Las Vegas, NV 89109
702 794 1800

WBS 1.2.6
QA: N/A

April 7, 1993

Contract #: DE-AC01-91RW00134
LV.ES.PE.ASK.CJN.4/93.029

**Carl P. Gertz, Project Manager
U.S. Department of Energy
Yucca Mountain Site Characterization Project Office
P.O. Box 98608
Las Vegas, Nevada 89193-8606**

Subject: Correction to OCRWM ESF Construction Readiness Review (9/15/92), Attribute List, Criteria #11, Test Control

The Attribute List which was utilized during the subject Readiness Review is correct in assigning criteria #11 responsibility to the M&O under action item No: M&O-002 which requires the generation of inspection procedures prior to the initiation of Title III inspection activities.

The Attribute List criteria #11 was not annotated to exclude REEC Co from the same requirement for inspection procedures. Attachment #1 - REEC Co C/N extract from QA PPCN 92-05 signed 4/10/92 deletes REEC Co from responsibility for test control. REEC Co is therefore exempted from criteria #11 evaluation.

Sincerely,

W. H. H.

Arthur S. Kubo

Assistant General Manager for Systems
TRW Environmental Safety Systems, Inc.

Concurrency:

June Fortnum

Tom Fortner

YMP ESF Construction Manager

W B Amecke

W. B. Simecka, Division Director

Engineering & Development Division

ASK:CJN:smh

...SURI

REECO YUCCA MOUNTAIN PROJECT QAPP CHANGE NOTICE		QAPPCN No. 92-05	Date:
		Major Change	Minor Change X
Page	Paragraph	Description of Change	
		EFFECTIVE DATE: WBS 1.2.9.3 QA	
XI-1	1	<p>This QAPPCN is being processed in order to clarify REECO's involvement in Test Control and to change an organization's title.</p> <p>Add the following two paragraphs prior to the existing paragraph in 1.0 of section XI, "Test Control," pg. XI-1.</p> <p>As the primary support contractor, REECO/YMP has no specifically designated responsibilities for Test Control on the YMP. REECO/YMP may participate in the review of Test Control Procedures if and when requested to do so by the YMPO or other participating organizations.</p> <p>Should REECO/YMP be assigned responsibility in this area, then the requirements of this section will apply and implementing procedures will be developed to meet the requirements specified. Test Control, if applied, would be applicable to engineered items and not to scientific investigative activities.</p>	
All	As Applicable	Delete all references to "Project Quality Assurance (PQA)" and replace all such references with "Quality Assurance Office (QAO)."	
Affected Documents: 568-DOC-115, Rev. 8.			
Originator:		<i>Paul J. Wilson</i>	Date: 4/10/92
Technical Project Officer Approval:		<i>127 Britcher</i>	Date: 4/10/92
Project QA Manager Approval:		<i>William J. Glavin</i>	Date: 4/10/92