

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

QUALITY ASSURANCE PROGRAM

QUARTERLY TREND REPORT

COVERING THE PERIOD JULY 1992 - JUNE 1993

Approved: _____



Donald G. Horton, Director
Office of Quality Assurance

Date: 7/15/93

EXECUTIVE SUMMARY

1.0 Introduction

Quality Assurance Administrative Procedure (QAAP) 2.9, *Quality Assurance Program Trend Evaluation and Reporting*, Revision 3, requires that each of the OCRWM Quality Assurance Divisions evaluate, at quarterly intervals, all Corrective Action Requests (CARs) issued within the last twelve months that identified significant conditions adverse to quality. The purpose of this evaluation is to determine if any adverse trends or generic adverse trends are evident in the OCRWM QA Program and to take prompt corrective action where such trends exist.

This report covers the period from July 1, 1992 through June 30, 1993 and evaluates all CARs that reported Significant Conditions Adverse to Quality. This evaluation incorporates new data from CARs issued during the quarter March 1993 - June 1993.

Section 1 reports the results of the Headquarters Quality Assurance Division (HQAD) trend evaluation. Section 2 reports the results of the Yucca Mountain Site Characterization Project Quality Assurance Division (YMQAD) trend evaluation. Each section provides the status of previously reported adverse trends and identified current adverse or generic trends. Each section also contains details on problems constituting current adverse or generic adverse trends, discusses causes and actions to correct these trends, and includes a table of CARs that were evaluated.

2.0 Summary

A total of Thirty One (31) CARs were evaluated during the reporting period. The HQAD evaluated Seventeen (17) CARs and the YMQAD evaluated Fourteen (14) CARs. One adverse trend was evident during the combined evaluation of the HQAD and YMQAD quarterly trend reports. There are four significant CARs (YM-92-056 dated 7/92, YM-93-037 dated 3/93, YM-93-040 dated 4/93, and HQ-93-13 dated 3/93) which have been issued to the M&O over that past twelve months which reflect an adverse trend relating to procedures to perform activities affecting quality. These conditions appear to be global and have been detected at more than one M&O location. The actions taken to date by the M&O do not appear to address the global issue. The specifics of the CARs address a multitude of problems regarding procedures such as: failure of procedures to address upper tier requirements, no procedures to perform quality affecting activities, and inadequate procedures. Even though the specifics are

different, the generic issue is the inability of the M&O to get control of its QA Program (i.e.; implementing procedures). Due to the recurrence of the generic issue (i.e.; inadequate/non-existent procedures), action must be taken by the M&O management to address this problem at all operating facilities in the M&O organization. CAR No. YM-93-070 has been generated to document this adverse trend.

No other adverse or generic adverse trends were noted as a result of this evaluation.

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

QUALITY ASSURANCE PROGRAM TRENDS REPORT


FOR

JULY 1992 THROUGH JUNE 1993

SECTION 2

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT

Approved



Richard E. Spence, Director
Yucca Mountain Site Characterization
Quality Assurance Division

Date

7/15/93

SECTION 2

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT

1.0 STATUS OF PREVIOUSLY REPORTED TRENDS

There are no unresolved adverse quality trends, and no unresolved trends carried forward into the quarter March - June 1993.

2.0 CURRENT ADVERSE AND GENERIC ADVERSE TRENDS

Fourteen CARs issued by the Yucca Mountain Quality Assurance Division (YMQAD) during the past twelve months identified conditions significantly adverse to quality. One adverse trend, related to a repetitive problem with the M&O, is noted regarding the lack of or inadequate implementing procedures. This trend is based on the conditions identified in CARs YM-92-056, YM-93-037, YM-93-040. It should be noted that CAR YM-92-035 was issued last quarter, but has been included as part of this quarters trend evaluation.

See Table 2-1, Significant Condition Data Base for Trend Evaluation, for a list of CARs evaluated.

3.0 PROBLEMS CONSTITUTING CURRENT ADVERSE TRENDS OR GENERIC ADVERSE TRENDS

The significant condition adverse to quality identified in CAR YM-92-056, issued in July of 1992, indicated that quality affecting activities were being performed in the absence of approved procedures. The significant condition adverse to quality identified in CAR YM-92-037, issued in March of 1993, indicated that implementing procedures do not address upper tier requirements of the M&O QAPD and do not adequately address current activities. The significant condition adverse to quality identified in CAR YM-93-040, issued in April of 1993, indicate that adequate procedures do not exist for the performance of design verification.

These three significant Corrective Action Requests over a period of one year represent a repetitive adverse trend within the CRWMS M&O organization. The significance of these conditions regarding inadequate or no procedures to perform

quality affecting activities raises concern on the M&O's ability to effectively resolve the repetitive problem.

4.0 SUMMARIES OF IDENTIFIED CAUSES AND ACTIONS REQUIRED TO CORRECT CURRENT ADVERSE TRENDS OR GENERIC ADVERSE TRENDS

Not applicable.

TABLE 2-1: SIGNIFICANT CONDITION DATA BASE FOR YMP TREND EVALUATION

CAR Number	CAR Issue Date	Response. Org.	Adverse Condition
YM-92-056	07/92	M&O	Test interference evaluations for Phase 2 neutron access boreholes and Drillhole NRG-1 were performed in the absence of a governing procedure.
YM-92-059	08/92	SNL	Not all underground explosion data described as qualified in the YMP Technical Data Catalog was collected under a fully qualified QA program or qualified by the AP-5.9Q "existing data qualification" process.
YM-92-062	08/92	YMP	Surface Based Testing Facilities Requirements Document (Section VI of YMP/CM-0007) requirement descriptions for several surface based testing activities did not contain qualitative or quantitative criteria for determining that the activities have been accomplished satisfactorily.
YM-92-076	09/92	SAIC	One Quality Finding Report (QFR) identified a three-part deficiency, but a response that addressed only one part was accepted, and the QFR was closed out without noting that the other two parts had not been addressed in the response or that one of the two had not been corrected.

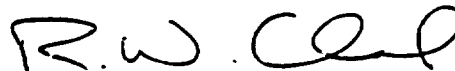
CAR Number	CAR Issue Date	Response. Org.	Adverse Condition
YM-93-004	10/92	YMP	Quality Assurance record packages were still being submitted to the records center with some of the records partially or wholly illegible; in the authors judgement, the "best available copy" provision of the records procedure was being abused by all records sources.
YM-93-020	12/92	YMP	Some quality-affecting activities were performed without documentation of training in the governing procedures. This deficiency existed in several Project Office areas, and the use of "real time" training was not clearly evident.
YM-93-027	12/92	YMP	No procedures have been developed to implement the TFM Plan, no TFM lists have been prepared, and no final analysis of TFMs have been utilized.
YM-93-032	02/93	RSN	Requirements of RSN Grading Report No. RSN-GR-032 are not being met as follows: Position Quals/Job Descriptions, Management Assessments of Survey Dept., M&TE for survey work not controlled, discrepancies not documented per QA Program, no audits and surveillance of field survey, and lack of software controls.
YM-93-033	02/93	REECO	Calibrations not performed in accordance with procedures and procedures were not revised and/or new ones generated when it was found that personnel could not work to existing requirements.
YM-93-036	03/93	M&O	The CRWMS M&O have not been implementing the requirements of QAP 5-1 for the control and review of procedures.
YM-93-035	03/93	YMPO	FCRs are not being completed in accordance with AP 3.5Q.

CAR Number	CAR Issue Date	Response. Org.	Adverse Condition
YM-93-037	03/93	M&O	CRWMS M&O Implementing Line Procedures do not meet some of the requirements of the QAPD and in some instances do not reflect current practices. ILP NSP-17-1 does not address requirements from QAPD for controlling documents and records. ILP NSP-6-1 is not consistent with current practices.
YM-93-040	04/93	M&O	Procedures do not provide criteria for determining the method of design verification.
YM-93-045	04/93	M&O	No evidence provided to reflect that the CRF storage facility has been evaluated to store "one-of-a-kind" records/items.

memorandum

DATE: July 2, 1993
REPLY TO:
ATTN OF: RW-3.1
SUBJECT: Headquarters Quality Assurance Division Quarterly Trends Report
TO: Director, Office of Quality Assurance, RW-3

The Headquarters portion of the OCRWM Quality Assurance Program Trends Report covering the period from July 1992 through June 1993 is attached. This report contains the results of an evaluation of Corrective Actions Requests (CARs) that identify significant conditions adverse to quality. Two CARs identifying significant conditions adverse to quality were issued during the third quarter of Fiscal Year 1993. No adverse trends were identified for this 12-month period.



Robert W. CLark, Director
Headquarters Quality Assurance
Division

Attachment

CC:
R. Spence, YMPO
M. Horseman, QATSS-HQ
K. Ransom, QATSS-HQ
T. White, QATSS-HQ
T. Johnson, RW-3.1

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

HEADQUARTERS QUALITY ASSURANCE DIVISION

QUARTERLY TRENDS REPORT

COVERING THE PERIOD JULY 1992 - JUNE 1993

Approved



Robert W. Clark, Director
Headquarters Quality Assurance Division

Date

7/1/93

**HEADQUARTERS QUALITY ASSURANCE DIVISION
QUARTERLY TRENDS REPORT
COVERING THE PERIOD JULY 1992 - JUNE 1993**

1.0 Status of Previously Reported Trends

There are no previously reported trends.

2.0 Current Adverse and Generic Adverse Trends

No adverse or generic adverse trends were evident from an evaluation of seventeen (17) Corrective Action Requests (CARs), issued by Headquarters during the last twelve months, that identified significant conditions adverse to quality.

Two CARs were issued, HQ-92-026 to EIA, and HQ-93-019 to M&O/TRW, identifying the lack of verification of experience for quality-affecting personnel. However, this is not a trend because several deficiencies, identified against EIA, cumulatively indicate a lack of an effective quality assurance program. CARs were issued separately for each of the identified conditions as matter of convenience so that each of them could be addressed independently.

Further, two CARs were issued, HQ-92-017 to RW-20, 30, and 40, and HQ-93-023 to PNL, identifying records inadequacies. This is not a trend because CAR HQ-92-017 deals with the improper transmittal of records packages to the Quality Records Center, and HQ-93-023 deals with the improper storage of records.

See Table 1-1, Significant Condition Data Base for HQ Trend Evaluation, for a list of CARs evaluated.

3.0 Problems Constituting Current Adverse Trends or Generic Adverse Trends

Since there are no current adverse or generic adverse trends at Headquarters, no problems constituting trends are evident.

4.0 Summaries of Identified Causes and Actions Required to Correct Current Adverse Trends or Generic Adverse Trends

Not applicable.

TABLE I-1: SIGNIFICANT CONDITION DATA BASE FOR HQ TREND EVALUATION

CAR Number	CAR Issue Date	Resp. Org.	Adverse Condition
HQ-92-017	10/13/92	RW-20 RW-30 RW-40	Inadequate management of QA records by records originators.
HQ-92-020	10/21/92	EIA	No QA program implementing procedures issued.
HQ-92-022	10/21/92	EIA	No SQAP. Inadequate QA program controls on RW-859 Data Collection System process.
HQ-92-023	10/21/92	EIA	No SQAP. Inadequate QA program controls on International Nuclear Model (INM).
HQ-92-025	10/21/92	EIA	Inadequate training program.
HQ-92-026	10/21/92	EIA	No position descriptions established. No verification of minimum education and experience.
HQ-93-006	01/28/93	RW-3.2	Inadequate evaluation of CAR responses, no root cause required for SCATQ.
HQ-93-009	02/16/93	EM-343	Ineffective technical review process.
HQ-93-010	02/16/93	EM-343	Technical activities not verified during audits/surveillances.
HQ-93-011	02/16/93	EM-343	List of items & activities subject to QARD not developed.
HQ-93-013	03/18/93	M&O	Procedures lack adequate acceptance criteria.
HQ-93-015	03/18/93	M&O	Audit deficiencies not reported on CARs.
HQ-93-018	03/18/93	M&O	Deficiencies in preparation & review of procedures.
HQ-93-019	03/18/93	M&O	Inadequate verification of education.
HQ-93-021	03/18/93	M&O	Audit reports lack effectiveness statements & summary of objective evidence.

TABLE 1-1: SIGNIFICANT CONDITION DATA BASE FOR HQ TREND EVALUATION
(Continued)

CAR Number	CAR Issue Date	Resp. Org.	Adverse Condition
HQ-93-022	05/17/93	PNL	Inadequate use of technical procedures; use of unapproved procedure.
HQ-93-023	05/17/93	PNL	Records maintained in individual files for longer than 90 days.