

**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

JUL 1 4 1993

Julie A. Canepa Technical Project Officer for Yucca Mountain Site Characterization Project Los Alamos National Laboratory University of California EES-13, Mail Stop J521 P.O. Box 1663 Los Alamos, NM 87545

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-93-049 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-93-11 OF LOS ALAMOS NATIONAL LABORATORY (LOS ALAMOS) (SCP: N/A)

The YMQAD staff has evaluated the response to CAR YM-93-049. The response has been determined to be unsatisfactory for the following reasons:

A. Remedial Action: Remedial action is required. Los Alamos' interpretation of the facts associated with the identified interfaces is at variance with procedural requirements.

The U.S. Geological Survey (USGS)/Los Alamos interface for the Hydrogenic Deposits activity (no work breakdown structure [WBS] given) was consummated directly between the Technical Project Officers. This approach is at variance with procedural direction (TWS-QAS-QP-01.1, Revision 2) which specifies that Administrative Procedure 5.19Q, is the governing procedure. Two specific results of this noncompliance are that the Interface Control Working Group Representative was not involved and that this interface did not receive an interface control number.

The documentation supporting the identification and control of the USGS/Los Alamos interface associated with WBS 1.2.3.3.1.2.2 remains incomplete. The available documentation indicates that this interface is viable and current. Los Alamos must comply with the procedure requirements or eliminate the interface.

B. Investigative Action: Los Alamos' response with regard to investigative action makes the assertion that no other interfaces exist. In the absence of any specific detail as to a course of proposed action, no evaluation as to appropriateness and acceptability is possible. Please describe the course of action used to make the assertion.

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	RADIOACTIVE V U.S. DEPART	E OF CIVILIAN WASTE MANAGEMENT IMENT OF ENERGY INGTON, D.C.	8 CAR NO.: <u>YM-93-049</u> DATE: <u>June 02,1993</u> SHEET: <u>1</u> OF <u>1</u> QA		
	CORRECTIVE ACTION REQUEST				
	1 Controlling Document TWS-QAS-QP-01.1, R2		ed Report No. Report YMP-93-11		
	3 Responsible Organization	4 Discussed With			
	Los Alamos Nat. Lab	S. Bolivar, M. Clevenger			
	Procedure TWS-QAS-QP-01.1, R2, "Interface Con sections 6.1 and 6.2 that interfaces be ident Interface Description Form be completed. Sec between Los Alamos and other Project Particip in accordance with YMP AP-5.19Q.	tion 6.3 requires that interf	aces		
	<ul> <li>6 Adverse Condition: The following interfaces have not been controlled and documented in accordance with the procedural requirements of TWS-QAS-QP-01.1, R2:</li> <li>* IMOU Los Alamos/USGS (no number) consummated by letters rather than through the mechanisms decscribed in AP-5.19Q. The letters referenced are: Los Alamos to USGS, dtd. 7/09/90 USGS to Los Alamos, dtd. 9/07/90</li> <li>* Interface Description Form (IDF) initiated between USGS/Los Alamos for WDS 1.2.3.3.1.2.2 but never completed</li> <li>* WBS Element 1.2.3.2.5 is an activity involving USGS, Los Alamos, and TEMSS for which no IDF could be produced.</li> </ul>				
	adverse to quality exist? Yes No <u>x</u> Yes	stop work condition exist? No <u>x</u> ; if Yes - Attach copy of SW( ircle One: A B C D	11 Response Due Date: D June 30, 1993		
	<sup>12</sup> Required Actions: X Remedial X Extent of Defit		Root Cause Determination		
	<ol> <li>Recommended Actions:</li> <li>Conduct investigative action to determine</li> <li>Complete the identification and documentat interface associated with WBS 1.2.3.3.1.2</li> <li>Document all interfaces identified in ite</li> <li>Take action to preclude recurrence.</li> </ol>	all interfaces subject to th ion for the Los Alamos/USGS .2. m 1. in accordance with the p	is procedure.		
	7 Initiator Blaylock James Blaylock 15 Response Accepted	14 Issuance Approved by: QADD A Hilling 16 Response Accepted	CL Date 6/8/93		
			Data		
	OAR Date 17 Amended Response Accepted	QADD 18 Amended Response Acce	Date		
	QAR Date	QADD	Date		
	19 Corrective Actions Verified	20 Closure Approved by:			
	QAR Date	QADD	Date		
			FUOL 021107		

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

CAR NO.	YM	P-93-049	
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		QA	

CORRECTIVE ACTION REQUEST (Continuation Page)

A. <u>Remedial Actions</u>: None required.

For the first bullet in Block 6:

There is no letter from Los Alamos to USGS dated 07/09/90 that references an IMOU.

Sample and date transfers involving the Hydrogenic Deposits Study between Los Alamos and USGS was documented on the following documents:

- 1. Los Alamos YMP Interface Description Form signed by R. Herbst, Los Alamos TPO, 07/20/90.
- Los Alamos YMP Memorandum of Understanding signed by R. Herbst, Los Alamos TPO, 07/20/90, and L. Hayes, USGS TPO, 08/30/90.
- 3. YMP Interface Identification/Memorandum of Understanding signed by R. Herbst, Los Alamos TPO, 07/20/90, and L. Hayes, USGS TPO, 08/30/90.

These documents were transmitted to R. Herbst from L. Hayes via USGS letter on 09/07/90. Documents 1-3 above consummated the agreement in accordance with AP5-19Q, not the transmittal letter.

## For the second bullet in Block 6:

Los Alamos YMP Interface Description Form for WBS 1.2.3.3.1.2.2 signed by K. West for R. Herbst, Los Alamos TPO, 07/09/91 was never implemented or transmitted to anyone. It was submitted as a project record as required by TWS-QAS-QP-01.1, R2. No instructions are provided for this procedure for further processing of this document, therefore, no noncompliance or adverse condition exists.

For the third bullet in Block 6:

There is no adverse condition. Many Work Breakdown Structure (WBS) activities are shared by various Project participants, which is indicated in the WBS Dictionary.

## B. Investigative Actions:

1. Work performed by the Los Alamos Staff was reviewed to determine where interfaces require control in accordance with TWS-QAS-QP-01.1. No other interfaces exist other than the

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•	OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C.	* CAR NO. YMP-93-049 DATE: 06729793 PAGE: 2 OF QA			
	CORRECTIVE ACTION REQUEST (Continuation Page)				
	one identified by the first bullet in Bloc <u>Responsible Individual:</u> Quality Assurance Liaison for EES/13. <u>Actual Completion Date:</u> June 30, 1993 C. <u>Corrective Action to Preclude Recurrence:</u> None required. No adverse condition exists be procedural noncompliance stated in this CAR.				
	Response Approved:	)APL			
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## Julie A. Canepa

C. Corrective Action to Preclude Recurrence: Although it is possible that investigative action may reveal that action to preclude recurrence is not necessary, it will not be due to the fact that there is no procedural noncompliance. Again, please propose a course of action for evaluation.

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, Quality Assurance Technical Support Services, 101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109. 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 (702) 794-7945 or James Blaylock at (702) 794-7913.

Richard E. Spence, Director Yucca Mountain Quality Assurance Division

YMQAD:RBC-5021

Enclosure: CAR YM-93-049

cc w/encl: J. B. Tillman, LAAO J. H. Hines, OQD, AL K. R. Hooks, NRC, Washington, DC S. W. Zimmerman, NWPO, Carson City, NV N. Z. Elkins, LANL, Las Vegas, NV S. L. Bolivar, LANL, Los Alamos, NM cc w/o encl: J. W. Gilray, NRC, Las Vegas, NV N. J. Brogan, QATSS, Las Vegas, NV