



Department of Energy  
Yucca Mountain Site Characterization  
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WBS 1.2.11  
QA: N/A

MAR 19 1993

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Site Characterization Project  
Sandia National Laboratories  
P.O. Box 5800  
Organization 6302  
Albuquerque, NM 87185

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF CORRECTIVE ACTION REQUEST  
(CAR) YM-92-070 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION  
(YMQAD) AUDIT YMP-92-22 OF SANDIA NATIONAL LABORATORIES

The YMQAD staff has verified the corrective action to CAR YM-92-070 and determined the results to be satisfactory. As a result, the CAR is considered closed.

If you have any questions, please contact either Robert B. Constable at (702) 794-7945 or Cynthia H. Prater at (702) 794-7742

*R.E. Spence*

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-3182

Enclosure:  
CAR YM-92-070

cc w/encl:

~~K. R. Hooks, NRC, Washington, DC~~  
S. W. Zimmerman, NWPO, Carson City, NV  
R. R. Richards, SNL, 6319, Albuquerque, NM  
J. F. Schelling, SNL, Las Vegas, NV  
R. L. Maudlin, MACTEC, Las Vegas, NV

cc w/o encl:

J. H. Hines, OGD, AL  
J. W. Gilray, NRC, Las Vegas, NV  
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9303260082 930319  
PDR WASTE  
WM-11 PDR

YMP-5

ADD: Ken Hooks

Ltr. Encl.  
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NHD3

ORIGINAL

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

8 CAR NO.: YM-92-070  
DATE: 9-1-92  
SHEET: 1 OF 1  
QA

**CORRECTIVE ACTION REQUEST**

1 Controlling Document  
DOP 3-13

2 Related Report No.  
Audit YMP-92-22

3 Responsible Organization  
SNL

4 Discussed With  
John Friend

5 Requirement:

DOP 3-13, Revision C, Section 5.3, paragraph 2, states "Ensure that completed DRC forms are included with records required by applicable procedures."

Note: DRC forms are required to be part of the TP record package.

6 Adverse Condition:

Contrary to the above requirements, there was no documented evidence that DRC forms were completed for the following Technical Procedure (TP) Interim Change Notices (ICNs):

TP-90, ICN 1  
TP-94, ICN 1

TP-91, ICN 1  
TP-96, ICN 1

TP-92, ICN 1  
TP-201, ICN 1

TP-93, ICN 1

9 Does a significant condition  
adverse to quality exist? Yes \_\_\_ No X  
If Yes, Circle One: A B C

10 Does a stop work condition exist?  
Yes \_\_\_ No X; If Yes - Attach copy of SWO  
If Yes, Circle One: A B C D

11 Response Due Date:  
20 days after issue

12 Required Actions: ☒ Remedial ☒ Extent of Deficiency ☒ Preclude Recurrence ☐ Root Cause Determination

13 Recommended Actions:

Identify the remedial action to be taken to correct the deficiency identified in Block 6.  
Identify the extent of the condition and the planned corrective action to prevent recurrence.

7 Issued by:

*[Signature]*

Date:

*8/21/92*

14 Issuance Approved by:

QADD

*[Signature]*

Date:

*9/2/92*

15 Response Accepted

QAR

Date:

*4/26/92*

16 Response Accepted

QADD

Date:

*[Signature]*

17 Amended Response Accepted

QAR

Date:

*4/26/92*

18 Amended Response Accepted

QADD

Date:

*[Signature]*

19 Corrective Actions Verified

QAR

Date:

*2/16/93*

20 Closure Approved by:

QADD

*[Signature]*

Date:

*5/18/93*

ENCLOSURE

REV. 08/91

**Response to CAR  
YM-92-070**

1. **Response**

1A. Remedial Actions

No remedial actions will be taken to correct the specific condition. SNL feels that there would be no benefit in trying to generate DRC sheets after the fact. A review of the ICNs in questions has been performed and each ICN (copies attached) is considered to be minor in nature (with the exception of ICN 01 to TP 201) and noncontroversial. Additionally, each ICN was reviewed and approved by no less than four SNL YMP personnel. It is SQL's opinion that this review and approval clearly demonstrate that any comments generated during the process were satisfactorily resolved prior to the issue of the ICNs.

1B. Investigative Action

A review of TPs disclosed an additional 11 ICNs without DRC sheets. As stated in Item 1A, all the ICNs (18 total) are considered to be minor in nature, with the exception of ICN 01 to TP 201. The review disclosed 14 of the ICNs were done by the same person in a relatively short time period. This person is no longer on the Project.

Further investigation has disclosed that several procedure cross-references are confusing; for example, one requires DRCs to be maintained while another makes it optional. In addition, conflicting direction has been provided in that the Project Records Management Plan, Section A.3.4, last paragraph, states in part, "Drafts, comments, and resolutions for both DOE and other Participant procedures may be retained by the organization, but do not need to be submitted to CFR for YMP retention." Therefore, some personnel simply discarded DRCs after comment resolution.

1C. N/A for this CAR.

1D. Corrective Action to Preclude Recurrence

SNL YMP Quality Assurance Implementing Procedures will be revised to provide clear, concise requirements on the use and maintenance of DRCs.

2. **Responsible Individual and Completion Date**

Item 1B — Complete

Item 1D — J. C. Friend

Estimated completion date — December 24, 1992

3. Response Approved:

*John T. Holmes* for  
Manager, YMP Management Dept.

*9/24/92*  
Date

*Ltr dtd 9/24/92 - Bleyman to Spence*

**Amended Response to CAR  
YM-92-070**

1. Response

1A. A memo will be placed in each applicable TP <sup>record file</sup> ~~folder~~ to document that DRC sheets are not available for the affected ICNs and to reference this CAR.

*PR*  
*10/8/92*

1B. No Change

1C. No Change

1D. No Change

2. Responsible Individual and Completion Date

Item 1A: J. C. Friend

Estimated Completion Date — November 2, 1992

3. Response Approved:

*Thomas E Bleyer*  
Manager  
YMP Management Department

*10/11/92*  
Date

*Ltr dtd 10/11/92 - Bleyer to Spencer*

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

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QA

**CORRECTIVE ACTION REQUEST (Continuation Page)**

**VERIFICATION OF CAR NO. YM-92-070**

Verification of CAR YM-92-070 was performed on March 16, 1993.

**REMEDIAL:**

Memorandum No. JCF:6319:mjh, Richards to Records File dated 10/8/92 was placed in the record files for the applicable TPs.

**EXTENT OF DEFICIENCY:**

SNL identified an additional 11 packages without DRC forms. All were considered minor in nature with the exception of ICN 01 to TP-201.

**CORRECTIVE ACTION TO PRECLUDE RECURRENCE:**

Completion of the following corrective action commitments was verified:

1. DOP-3-13 was replaced with QAIP 6-3 on 2/12/93 to give instructions on the use of the DRC sheets. QAIP 6-3 directs that individual procedures will specify whether the DRC sheets are to handle as a QA record or not.
2. The QAR reviewed the new records sections of three of four revised procedures that had been determined by SNL to need "clear, concise requirements on the use and maintenance of DRCs." The procedures reviewed were QAIP 5-1, Revision 02 effective 1/29/93, QAIP 6-2, Revision 01 effective 9/11/92 and QAIP 6-3, Revision 00 effective 2/12/93. The QAR determined that the revised requirements included in the aforementioned procedures is satisfactory to preclude recurrence.

  
Cynthia H. Prater, QAR

  
Date