



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

FEB 11 1993

Carl P. Gertz, Project Manager, YMP, NV

EVALUATION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-93-004  
RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT  
YMP-92-24

The YMQAD staff has evaluated the amended response to CAR YM-93-004, dated January 14, 1993. The 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 Amelia I. Arceo at 794-7737.

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-2497

Enclosure:  
CAR YM-93-004

cc w/encl:

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

cc w/o encl:

J. W. Gilray, NRC, Las Vegas, NV  
N. J. Brogan, SAIC, Las Vegas, NV  
A. I. Arceo, SAIC, Las Vegas, NV

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PDR WASTE PDR  
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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-93-004  
DATE: 10/6/92  
SHEET: 1 OF 2  
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document QAPD, Revision 3, and AP-1.18Q, Revision 1		2 Related Report No. YMP-92-24	
3 Responsible Organization YMPO		4 Discussed With C. Gertz	
5 Requirement:  QAPD, Revision 3, Section 17.0, Paragraph 17.3, states in part: "Documents designated to become records are to be legible, identifiable, accurate, complete, reproducible, microfilmable, and appropriate to the work accomplished."  AP-1.18Q, Revision 1, Paragraph 5.6, states in part: "Prepare the individual records or records package in accordance with Appendix A...." Appendix A, Item 1, requires that draft documents be stamped "DRAFT" on their first page of the draft document.			
6 Adverse Condition:  Contrary to the above, the following records deficiencies were found:  Records or portions of records were illegible:  NNA 920807.0066, Study Plan 8.3.1.17.4.5 NNA 920807.0076, Job Package 92-12  Records package was incomplete (missing pages):  NNA 920807.0076, Job Package 92-12  Record not identified correctly (not stamped "DRAFT"):  NNA 920807.0066, Draft Study Plan 8.3.1.17.4.5  (Continued)			
9 Does a significant condition adverse to quality exist? Yes <u>X</u> No <u>    </u> If Yes, Circle One: <u>(A)</u> B C		10 Does a stop work condition exist? Yes <u>    </u> 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 checked="" type="checkbox"/> Extent of Deficiency <input checked="" type="checkbox"/> Preclude Recurrence <input checked="" type="checkbox"/> Root Cause Determination			
13 Recommended Actions: Identify the remedial actions to be taken to correct the deficiencies noted in Block 6. Investigate the program processes, activities or documentation to determine the extent and depth of similar conditions as noted in Block 6. Identify these deficiencies and provide the measures to correct them.  (Continued)			
7 Initiator Amelia J. Arceo Date 10/6/92		14 Issuance Approved by: QADD <u>AC Spence</u> Date 10/8/92	
15 Response Accepted QAR <u>Amelia J. Arceo</u> Date 12/9/92		16 Response Accepted QADD <u>AC Spence</u> Date 12/15/92	
17 Amended Response Accepted QAR <u>Amelia J. Arceo</u> Date 2/9/93		18 Amended Response Accepted QADD <u>AC Spence</u> Date 2/11/93	
19 Corrective Actions Verified QAR Date		20 Closure Approved by: QADD Date	

ENCLOSURE

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**CORRECTIVE ACTION REQUEST (Continuation Page)**

**6 Adverse Condition (continued)**

**DISCUSSION:**

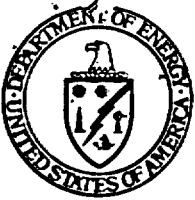
While it has always been an upper-tier requirement for records to be legible, it was realized (CAR YM-91-065) that certain "one of a kind records" with portions which were illegible, should be retained. This was only to be utilized for unique records where these illegible portions could not be transcribed or enhanced, and it was thought that those portions which were legible would be of benefit to the Project. However, in the allowance of a system to provide a means by which these unique records could be transmitted into the Records Center, it has become standard practice among DOE and Participants to abuse the system.

In the conduct of this audit, it was found that the statement, "I have reviewed this record/records package and it is adequate for its intended purpose. All blanks are intentional. Any illegible, uncorrected, or incomplete information does not impact future, in-process, or completed work" is being utilized "carte blanche" for records and not just for those unique "One of a kind records" which contained deficiencies which would not meet the requirements of the QAPD and NQA-1.

**13 Recommended Action(s) (continued)**

Identify the cause of the condition and the planned corrective action to prevent recurrence.

NOTE: Response to the above must include and consider all participants as the deficiencies, as detected herein, is considered Project-wide.



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DEC 04 1992

Richard E. Spence, Director, Quality Assurance Division, YMP, NV

RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-93-004

Following are the actions proposed to be taken to correct the adverse conditions identified in CAR YM-93-004:

1. Remedial Action - A legible copy of NNA 920807.0066, Study Plan 8.3.1.17.4.5, indicated as "Draft," will be resubmitted for microfilming. The new submittal will supersede the current illegible record. The Yucca Mountain Site Characterization Project Office (YMPO) will be responsible for resubmitting this record to the Las Vegas Local Records Center (LVLRC) by December 11, 1992.

Job Package 92-12 will be resubmitted in its entirety and will encompass all missing pages. The new submittal of this record will supersede NNA 920807.0076. YMPO will be responsible for resubmitting this record to the LVLRC by December 11, 1992.

2. Investigative Action - Based on daily observations, participants have abused the use of the illegible and incomplete statement contained in Administrative Procedure (AP) 1.18Q which allows for entry of illegible and incomplete records into the permanent record system.

The omission of the "Draft" from the record appears to have been an oversight by the record source. Further investigation will be performed to ensure that this was an isolated occurrence. YMPO will be required to submit a list of current Study Plans to LVLRC by December 11, 1992. LVLRC will review one-third of this list on microfilm to verify that any Study Plan submitted as a draft has the word "Draft" stamped on the first page. This action will be completed by December 30, 1992.

3. Root Cause - AP 1.18Q, page 19, Appendix C, Correction of Records, Part I, Item 2, revised in Interim Change Notice 1, allows for entry of deficient records by all Las Vegas record sources. All participants have implementing procedures which allow for the same disposition of these records. Outside participants have their own procedures which allow for entry of such records.

The root cause for the "Draft" item referred to in Item 2 above will be addressed no later than December 30, 1992, after the investigative action for that item has been completed.


Richard E. Spence

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4. Corrective Action to Preclude Recurrence - AP 1.18Q, which is applicable to all Las Vegas participants, will be revised by January 30, 1992, and have more stringent requirements for submitting illegible or incomplete records. A directive to all participants, including outside laboratories, will be prepared directing all participants to revise their procedures to conform to the same requirements that will be contained in AP 1.18Q. Training requirements will be assigned in accordance with Quality Management Procedure 02-01.

If you have any questions, please contact John G. Gandi at 794-7954.

  
Carl P. Gertz  
Project Manager

YMP:JGG-1312

cc:

N. J. Brogan, SAIC, Las Vegas, NV  
W. B. Simecka, YMP, NV  
A. V. Gil, YMP, NV  
B. J. Verna, YMP, NV

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CORRECTIVE ACTION REQUEST (Continuation Page)

1. Corrective Action Response for CAR #YM-93-004

- A. Remedial Action - A legible copy of NNA 920807.0066, Study Plan 8.3.1.17.4.5, indicated as "Draft," will be resubmitted for microfilming. The new submittal will supersede the current illegible record. The Yucca Mountain Site Characterization Project Office (YMPO) will be responsible for resubmitting this record to the Las Vegas Local Records Center (LVLRC) by December 11, 1992.

Job Package 92-12 will be resubmitted in its entirety and will encompass all missing pages. The new submittal of this record will supersede NNA 920807.0076. YMPO will be responsible for resubmitting this record to the LVLRC by December 11, 1992.

- B. Investigative Action - Based on daily observations, participants have abused the use of the illegible and incomplete statement contained in Administrative Procedure (AP) 1.18Q which allows for entry of illegible and incomplete records into the permanent record system.

The omission of the "Draft" from the record appears to have been an oversight by the record source. Further investigation will be performed to ensure that this was an isolated occurrence. YMPO will be required to submit a list of current Study Plans to LVLRC by December 11, 1992. LVLRC will review one-third of this list on microfilm to verify that any Study Plan submitted as a draft has the word "Draft" stamped on the first page. This action will be completed by December 30, 1992.

- C. Root Cause - AP 1.18Q, page 19, Appendix C, Correction of Records, Part I, Item 2, revised in Interim Change Notice 1, allows for entry of deficient records by all Las Vegas record sources. All participants have implementing procedures which allow for the same disposition of these records. Outside participants have their own procedures which allow for entry of such records.

*Ltr Ltr 12/9/92 - YMP:JGG-1428*

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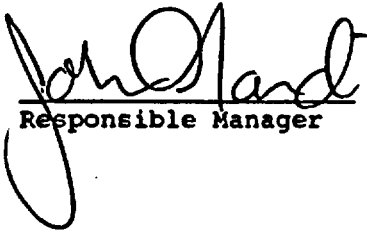
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CORRECTIVE ACTION REQUEST (Continuation Page)

The root cause for the "Draft" item referred to in Item 2 above will be addressed no later than December 30, 1992, after the investigative action for that item has been completed.

- D. Corrective Action to Preclude Recurrence - AP 1.18Q, which is applicable to all Las Vegas participants, will be revised by January 30, 1992, <sup>3, 8<sup>th</sup></sup> 12/18/92 and have more stringent requirements for submitting illegible or incomplete records. A directive to all participants, including outside laboratories, will be prepared directing all participants to revise their procedures to conform to the same requirements that will be contained in AP 1.18Q. Training requirements will be assigned in accordance with Quality Management Procedure 02-01.
2. The individual responsible for assuring that the above completion dates are met is Lynda J. Lee, M&O Project Records Center Manager, Civilian Radioactive Waste Management System Management and Operating Contractor.

3. Response Approved:

  
Responsible Manager

Date: 12/9/92

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**CORRECTIVE ACTION REQUEST (Continuation Page)**

**1. Corrective Action Response for CAR #YM-93-004**

**B. Investigative Action - Follow-Up**

The Local Records Center (LRC) received the list of current Study Plans from the Yucca Mountain Site Characterization Project Office (YMPO) and reviewed one-third of this list. Upon completion of this task, it was discovered that all of the records reviewed lacked "Draft" indication on the first page as required by procedures.

**C. Root Cause**

Root Cause for items not being stamped "Draft" is that records generated by Participants and submitted to YMPO for review and comment are not considered "Drafts" by the particular Participant and, therefore, are not stamped "Draft."

**D. Remedial Action**

Participants shall be reminded, via formal directive by YMPO, to follow the Records Management Plan, Appendix A, Identification, Preparation, Submittal, and Correction of Records, Paragraph A.3.4 DRAFT DOCUMENTS, page A-5, "For Participants other than DOE: 1. The version submitted by the Participant to the DOE as a deliverable for review and comment shall be considered the draft. Previous versions. . ."

As a corrective measure, we would recommend that LRC view the remaining records, determine which records require resubmittal indicating "Draft," submit that list to YMPO and YMPO will resubmit the corrected records and Table of Contents to LRC for refilming.

The completion of this activity is scheduled for March 30, 1993. The individual responsible for assuring that the above completion date is met is Lynda J. Lee, M&O Project Records Center Manager, Civilian Radioactive Waste Management and Operating Contractor.

*Ltd* 1/14/93 - YMP: JGG - 1848

*Lynda J. Lee*

1/14/93

12/9/92

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