



Department of Energy
 Yucca Mountain Site Characterization
 Project Office
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WBS 1.2.9.3
 QA: N/A

APR 15 1993

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

CORRECTIVE ACTION REQUEST (CAR) YM-93-003

Enclosed is an amended response to the subject CAR. It describes an alternate approach to take to complete corrective action 1.D (3,a) (regarding To Be Determined/To Be Verified data in Administrative Procedure (AP) 3.6Q, Configuration Management) until the new Mined Geologic Disposal System requirements documents are issued. Our prior response for corrective action 1.D (3,a) was to make an interim change notice (ICN)-type change to AP 3.6Q.

Since our prior response, events have transpired that indicate an alternate approach for this corrective action is warranted. These events include the following: (1) AP 3.6Q was recently redrafted in preparation for formal Quality Assurance Procedure (QAP) 6.2 review. This was a milestone in the Yucca Mountain Site Characterization Project (YMP) Configuration Management Improvement Plan (CMIP) to streamline, simplify and combine YMP procedures; (2) Since the current version of AP 3.6Q is Revision 0, ICN 3, a Document Action Request would involve a rewrite in accordance with QAP 5.1; (3) Program-level procedures were recently approved by Office of Civilian Radioactive Waste Management that address Configuration Management (CM) requirements concerning configuration item identification, baseline change control, configuration information system (CIS) and configuration verification. These new procedures represent the essential CM requirements and, therefore, could eliminate the need for AP 3.6Q and AP 3.8. This third event requires further review.

This amended response will implement the corrective action in a different manner than originally planned by using the draft of AP 3.6Q prepared as part of the YMP CMIP efforts as the applicable document for this corrective action. This draft will be revised and submitted for QAP 6.2 review by May 31, 1993. The enclosed CAR Continuation Sheets have been changed to reflect this alternate approach.

This amended response includes a request for extension of interim completion dates for corrective actions 1.D (1) and 1.D (3,a) from February 28, 1993, to May 31, 1993, and corrective action 1.D (2) from April 30, 1993, to May 31, 1993. This extension is necessary since the conditions under which the response was originally prepared have changed as a result of the events noted above and additional time is required to respond to the corrective action. All other committed actions will be implemented without change.

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*Add: Ken Hooker
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APR 15 1993

Richard E. Spence

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If you have any questions, please contact either Bruce D. Hutchinson at 794-7936 or Betty G. Cruz at 794-1851.

Clayton A. Petri for

William B. Simecka, Director
Engineering & Development Division

EDD:BDH-3736

Enclosure:
Continuation Pages
for CAR YM-93-003

cc w/encl:

K. R. Hooks, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
S. D. Johnson, PSDO/REEC, Las Vegas, NV
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1. **Corrective Action Response for CAR # YM-93-003**

A. **Remedial Action**

No remedial action is to be taken regarding the requirements documents in the current document hierarchy. These documents are shown in Attachment 1 (an annotated version of the CCB Register Report) under the "Level 2-CCB Baseline" portion of the Report. The annotations indicate applicability and status of logs. Five of the annotated documents do not include the TBD/TBV logs: ESF Subsystem Design Requirements Document, Waste Package Design Basis, SCP Exploratory Studies Facility-Vols I & III, Mined Geologic Disposal Repository Design Requirements and MGDS System Requirements. These five documents will be superseded by others currently in preparation for the new MGDS document hierarchy, as noted below in Paragraph D. The new OCRWM Document Hierarchy of requirements documents at the Program and Project levels have notations throughout the document indicating data that is of TBD nature.

B. **Investigative Action**

Investigation has shown that 5 of the 8 documents of a requirements or configuration data nature noted in Attachment 1 do not include the TBD/TBV logs. The status is annotated on the right hand margin of Attachment 1. The need for TBD/TBV logs is not specified in an existing document that pertains to technical document preparation such as OCRWM QAP 3.5 procedure, Technical Document Preparation. The requirement for logs should be stated in this procedure for preparing technical documents, and the responsibility for updating and maintenance of the log should be assigned to the document custodian. The need for TBD/TBV data in design documents such as drawings and design specification should apply to the design input process to reflect a flow-down from the respective Project level requirements documents.

C. **Root Cause Determination**

Not Applicable.

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D. Corrective Action to Preclude Recurrence

The corrective action is in three parts:

(1) A DAR regarding OCRWM procedure QAP 3.5, Preparation of Technical Documents, will be submitted to add the need of TBD/TBV logs for OCRWM requirement documents. The logs will take the form of summary tables that show section numbers and TBD/TBV entries. Since these are requirements documents and TBD/TBV data will be annotated in the body of the requirements document, the schedule or responsibility data is not necessary.

(2) Project level requirements documents for the new MGDS document hierarchy will include TBD/TBV data, whether the DAR noted above is approved or rejected. Project level requirements documents will also specify that design organizations incorporate the requirements for control of TBD/TBV data in their design process. The Project level documents are the Repository Design Requirements, Site Design and Test requirements, Engineered Barrier Design Requirements, ESF Design Requirements and Surface Based Test Facility Design Requirements.

(3,a) A revision regarding AP-3.6 will be submitted to delete the requirement of organizational responsibility and schedule resolution data for TBD/TBV data.

(3,b) After the above Project level documents have incorporated TBD/TBV data and are approved, another DAR regarding AP-3.6 will be submitted to: delete reference to TBD/TBV logs for the reasons noted in paragraph 1.B; and clarify that the existence of such logs is verified in the CM process as complying with the Project level requirements noted in (1) above, but that TBD/TBV data is maintained by the document custodian.

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2. Assigned Responsibility

| <u>Action</u> | <u>Individual</u> | <u>Completion</u> |
|---------------|-------------------|---|
| 1.A | N/A | |
| 1.B | T. C. Geer | Completed October 30, 1992 |
| 1.C | N/A | |
| 1.D (1) | T. C. Geer | Submit DAR recommendation to OCRWM by May 31, 1993 |
| 1.D (2) | T. C. Geer | Complete by May 31, 1993 |
| 1.D (3,a) | B. G. Cruz | Submit AP-3.6Q Revision by May 1993 |
| 1.D (3,b) | B. G. Cruz | Submit DAR by May 31, 1993 |

3. Response Approved:

W. B. Simecka
W. B. Simecka

Date:

4/15/92