

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
QUALITY ASSURANCE PROGRAM
QUARTERLY TRENDS REPORT
COVERING THE PERIOD APRIL 1992 - MARCH 1993

Approved



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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 April 1, 1992 through March 31, 1993 and evaluates all CARs that reported Significant Conditions Adverse to Quality. This evaluation incorporates new data from CARs issued during the quarter January 1993 - March 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 identifies current adverse or generic adverse 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 twenty eight (28) CARs were evaluated during the reporting period. The HQAD evaluated sixteen (16) CARs and the YMQAD evaluated twelve (12) CARs. No adverse trends or generic adverse trends were evident in either of the evaluations.

Two CARs (HQ-93-018 and YM-93-036) were issued identifying inadequate preparation and review of procedures. In addition, two CARs (HQ-93-013 and YM-93-037) identify an adverse condition where procedures that do not meet QAPD requirements or reflect current practice. However, neither of these pairs of CARs indicate an adverse trend or a generic adverse trend. All four CARs were issued to the M&O in March, 1993. This indicates that the deficient conditions are limited to one organization at one point in time and therefore, are not repetitive. Separate CARs were issued as a matter of convenience in addressing corrective action.

Two CARs (YM-92-076 and HQ-93-006) identified deficiencies in CAR or Quality Finding Report (QFR) responses. These CARs also do not constitute an adverse trend or generic adverse trend. CAR YM-92-076 identified deficiencies in the

adequacy of the response provided by the responsible organization and errors in the verification and closure of the deficiency. CAR HQ-93-006 identified deficiencies in the issuance of significant level CARs by YMQAD since they did not always indicate that investigative action to determine the extent of the deficiency and root cause were required.

SECTION 1

HEADQUARTERS

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 sixteen (16) Corrective Action Requests (CARs), issued by Headquarters during the last twelve months, that identified significant conditions adverse to quality.

Two CARs were issued, one to EIA and one to the M&O, 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.

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

CAR Number	CAR Issue Date	Resp. Org.	Adverse Condition
HQ-92-007	03/30/92	ORNL	Procurement documents do not contain QA program requirements and were not subjected to QA or technical review.
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 prep & 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.

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 January 1993 - March 1993.

2.0 Current Adverse and Generic Adverse Trends

Twelve CARs issued by the Yucca Mountain Quality Assurance Division (YMQAD) during the last twelve months identified conditions significantly adverse to quality. No adverse or generic adverse trends were identified during evaluation of those CARs.

It should be noted that CARS YM-92-056, YM-93-036, and YM-93-037 appear to have a common base (i.e.; Procedures), however, each CAR is unique in relation to the specific problem. CAR YM-92-056 applies to the lack of procedures to perform a given task. CAR YM-93-036 applies to the existence of procedures, but in practice, implementation is not consistent. CAR YM-93-037 applies to a failure to carry down upper tier requirements into implementing procedures.

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

3.0 Problems Constituting Current Adverse Trends or Generic Adverse Trends

In the absence of current trends or generic adverse trends, no such problems exist.

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	Resp. Org.	Adverse Condition
YM-92-033	04/92	YMP	Individual records not traceable to Study Plan or Job Package.
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.
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.

CAR Number	CAR Issue Date	Resp. Org.	Adverse Condition
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 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-93-037	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.