



Department of Energy
Washington, DC 20585

JUN 17 1991

Mr. John J. Linehan
Deputy Director
Division of High-Level
Waste Management
Office of Nuclear Material
Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Linehan:

This responds to your letter of October 24, 1990 (Linehan to Shelor), which notifies you as requested that the remaining exception, "Personnel Qualifications," for the U.S. Department of Energy (DOE) Office of Civilian Radioactive Waste Management (OCRWM) acceptance of the Reynolds Electrical & Engineering Company, Inc. (REECo) Quality Assurance (QA) Program has been addressed.

Enclosed is Surveillance Report Number YMP-SR-91-007. This surveillance was conducted by the Yucca Mountain Quality Assurance Division at REECo, in Las Vegas, Nevada, during February 4-11, 1991, and verified that the Privacy Act issue related to this exception had been resolved. During this surveillance, satisfactory access to record files to verify personnel qualification, certification, and indoctrination and training records was provided. The Office of Quality Assurance (OQA) recognizes that there were Corrective Action Requests (CARs) issued as a result of this surveillance.

During a subsequent OQA audit of REECo (Audit 91-02), several criteria were deemed ineffective as a result of the CARs that were written. However, REECo has initiated prompt corrective action to resolve the deficiencies identified on these CARs. OQA has accepted all proposed corrective actions and will closely monitor completion of the commitments contained within their response. Of particular note, aggressive action has been undertaken to address the staffing of the QA Organization (criterion 2); the staffing levels are being attained ahead of schedule. Consistent with OQA's initial QA program acceptance basis (pursuant to DOE letter; Stein to Browning, dated September 12, 1990), the fact that there were no Severity Level I CARs issued on this area makes the existing conditions acceptable for the purposes of resolving the Personnel Qualification exception for this participant.

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For future consideration, it is the position of OQA that identifying and resolving deficiencies, after initial QA program acceptance, is a QA program implementation matter. In this regard, OQA believes that identifying and resolving deficiencies is inherent to the implementation of a QA program after initial acceptance and is to be expected.

Based on this information, the OCRWM OQA concludes that the REECO QA Program is acceptable for implementation of new site characterization activities and other quality-related activities for the Yucca Mountain Site Characterization Program with no exceptions.

Therefore, DOE requests your review and unconditional acceptance of the REECO QA Program based on the enclosed Surveillance Report.

Should you have any questions, please contact Linda Desell of my office at (202) 586-1462.

Sincerely,



Dwight E. Shelor
Acting Associate Director for
Systems and Compliance
Office of Civilian Radioactive
Waste Management

Enclosure:
Surveillance Report Number YMP-SR-91-007

cc w/Enclosure:
C. Gertz, YMPO
R. Loux, State of Nevada
M. Baughman, Lincoln County, NV
D. Bechtel, Clark County, NV
S. Bradhurst, Nye County, NV
P. Niedzielski-Eichner, Nye County, NV
K. Hooks, NRC

YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION

QUALITY ASSURANCE SURVEILLANCE REPORT OF

REYNOLDS ELECTRICAL AND ENGINEERING COMPANY, INC.

SURVEILLANCE NUMBER YMP-SR-91-007

CONDUCTED FEBRUARY 4 THROUGH 11, 1991

ACTIVITIES SURVEILLED:

PERSONNEL QUALIFICATION AND CERTIFICATION AND
INDOCTRINATION AND TRAINING

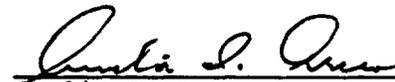
Prepared by:


Thomas J. Higgins
Surveillance Team Leader
Quality Assurance Scientist
Yucca Mountain Quality Assurance Division

Date:

3-21-91

Concurred by:


Amelia I. Arceo
Quality Assurance Engineer
Yucca Mountain Quality Assurance Division

Date:

3-21-91

Approved by:


Donald G. Horton
Director
Yucca Mountain Quality Assurance Division

Date:

3/25/91

~~91040/20078~~ 18pp.

1.0 INTRODUCTION

This report contains the results of the Yucca Mountain Quality Assurance Division (YMQAD) Surveillance YMP-SR-91-007 of Reynolds Electrical and Engineering Company, Inc. (REECo), conducted in Las Vegas, Nevada, from February 4 through 11, 1991.

2.0 PURPOSE AND SCOPE

The purpose of this surveillance was to evaluate the effectiveness of implementation of that portion of Criterion II, "Quality Assurance Program," relating to the qualification, certification, indoctrination, and training of personnel. This evaluation focused on compliance with the following approved REECo Quality Procedures (QPs):

<u>Procedure</u>	<u>Title</u>
QP 2.2	Personnel Qualification And Certification
QP 2.4	Indoctrination And Training

3.0 SURVEILLANCE PERSONNEL

The surveillance was conducted by the following personnel:

Thomas J. Higgins, Quality Assurance (QA) Scientist (Surveillance Team Leader), Science Applications International Corporation (SAIC)/YMQAD
Amelia I. Arceo, QA Engineer, SAIC/YMQAD

4.0 SUMMARY OF SURVEILLANCE RESULTS

The implementing procedures listed in Section 2.0 of this report were the source of requirements on which this surveillance was based. Checklists generated from these documents were used to determine compliance. The following results were obtained during the surveillance:

1. QP 2.2, Revision 5, "Personnel Qualification And Certification"

Three Corrective Action Requests (CARs) were issued for noncompliance with QP 2.2, Revision 5.

The surveillance team examined the individual training records of 42 percent (21 of 50) of the personnel who are dedicated to the Yucca Mountain Site Characterization Project (YMP) and who work under the REECo Quality Assurance Program Plan (QAPP). This sample was stratified to reflect the various organizational responsibilities of REECo's Division 580. The number chosen in each stratum varied with the number of personnel in that organization. All managers reporting

directly to R.F. Pritchett, REECO Technical Project Officer (TPO), were selected as were all current and recent members of the REECO Quality Assurance Office. Attachment 1 provides details of sample selection and make-up.

Examination of the sample documentation revealed the following:

1. A position description does not exist for the position "Drilling Foremen." In addition, a Qualification Record has been completed for the incumbent, W.C. Roberts, certifying his qualification to perform quality-affecting work. Procedurally, this qualification is based upon completed initial training and documentation of verified education and experience requirements all of which must be determined from a position description. There was no documentation in the file that the Human Resources Department had verified Mr. Roberts' experience and education. However, without a position description as a basis of requirements for comparison, lack of the verification documentation is secondary. CAR No. YM-91-021 addresses this deficiency.
2. The documentation generated for the initial training of personnel, the verification of education and experience, and the evaluation of an individual as qualified to perform quality-affecting work is not always completed in the procedurally-required order. Ten files exhibited this condition. CAR No. YM-91-022 addresses this deficiency.
3. Quality-affecting activity was carried out by an individual prior to the completion of initial training. Before completion of her own initial training on August 15, 1989, the Information Management Office Manager completed T. M. Zellers' Qualification Record (March 29, 1989) and then assigned that individual initial training on June 6, 1989. (Note: that the management of Mr. Zellers' initial training and qualification was procedurally incorrect.) CAR No. YM-91-023 addresses this deficiency.
4. A Qualification Record had been completed on August 14, 1989, for an individual; however, the REECO Human Resources Department stated, by letter, that it was unable to verify minimum education requirements for that individual. This lack of verification was documented on May 19, 1989, for C.J. Mason (YMP Drilling Department Manager) and was included in the training records. Actual verification took place as a result of the surveillance and was documented on February 5, 1991. The surveillance team evaluated this condition and determined that no CAR would be written, for the following reasons: (1) the verification of education was positive, (2) there was a single incidence of this condition, (3) there was no negative impact on other quality affecting work, and (4) it was the team's judgment that the condition required only remedial action, which had already been completed.

2. QP 2.4, Revision 1, "Indoctrination and Training"

One CAR was issued for noncompliance with QP 2.4, Revision 1.

TRAINING DEVELOPMENT AND TRAINING: No deficiencies were identified.

The surveillance team examined the documentation supporting the following classroom training:

<u>Lesson plan</u>	<u>Prepared by</u>	<u>First presentation</u>
Indoctrination & Training TR-001, Revision 0, 3/30/89	R.L. Holiday	5/23/89
Instructor Qualification TR-002, Revision 0, 1/16/90	M.C. Barker	1/18/90
YMP Records Management Manual TR-003, Revision 0, 5/11/90	D.R. Warriner	5/22-23/90

Examination of this documentation revealed the following:

- a. Instructors were found to be qualified and each met the procedural requirements necessary to conduct classroom training.
- b. Lesson plans for each course met procedural requirements.
- c. Attendance rosters for the classes were examined. The rosters contained the Course, Instructor, Date of Presentation, List of Attendees with signatures, and Instructor Signature with date.
- d. Training Course Evaluations were also completed by each attendee, with the exception of the May 23, 1990 session of TR-001 session, which was performed as a practice "dry run".

PROGRAM DOCUMENT CHANGES: Two deficiencies were identified.

The surveillance team determined that program documents were issued without allowing a time period in which personnel might be trained to the changes prior to document implementation. These are the REECO QAPP, 568-DOC-115, Revision 8 and the following procedures:

<u>Procedure</u>	<u>Title</u>
QP 1.0, Revision 7	Organization
QP 2.4, Revision 1	Indoctrination and Training
QP 3.3, Revision 2	Technical Assessment Review
QP 5.2, Revision 2	Preparation, Issue, and Control of Work Procedures

<u>Procedure</u>	<u>Title</u>
QP 8.0, Revision 5	Identification and Control of Materials, Parts, and Components
QP 13.0, Revision 5	Handling, Shipping, and Storage
QP 14.0, Revision 6	Inspection, Test, and Operating Status
QP 16.0, Revision 7	Corrective Action

This condition is addressed in CAR No. YM-91-024 as Requirement and Adverse Condition B.

For completeness, the surveillance team also looked at a sample of training files to assess the degree to which personnel failed to complete training assignments related to new or revised program documents. The sample chosen (see Attachment 3) included a portion (16 of 21) of the individuals' records previously examined in Section 1 of this report, as well as the files of nine individuals reporting to other REECo divisions that provide support to Division 580, as needed. The files examined for the matrixed organizations belong to individuals who have provided assistance and will provide assistance in the future to the YMP.

<u>Number</u>	<u>Matrix Organization</u>
2	Human Resources
2	Power, Electricity and Communication
2	Quality Assurance--Weld and Physical Standards Labs
2	Operations Equipment
1	Industrial Hygiene

For Division 580, the individual training files show that 7 of 16 had incomplete training assignments due to new or revised program documents (see Attachment 3). The noted deficiencies for S.O. Straub, J.P. McGoldrick, and M.C. In the matrixed organizations, the files for eight out of nine individuals exhibited incomplete assignments. In the latter case, this would seem to exhibit the difficulty in utilizing individuals not dedicated to the program, as considered from the perspective of being fully prepared to perform quality-affecting work at all times. Identification of specific deficiencies is provided in Attachment 4 for all individuals.

The above condition(s) is addressed in CAR No. YM-91-024 as Requirement and Adverse Condition A.

MANAGEMENT ASSESSMENT: No deficient conditions were observed.

The training program was evaluated during the Management Assessment conducted May 7, 1990 through June 4, 1990, by R.R. Rommel, B.R. Gardella, K.L. Limon, and S.L. Johnson. Management Assessment Report, Section 6.4 (Document No. 90-063898) contained specific training recommendations.

5.0 CLOSURE OF OUTSTANDING DEFICIENCY REPORTS

None.

6.0 PERSONNEL CONTACTED DURING THE SURVEILLANCE

The following REECo personnel were contacted during the surveillance:

Pritchett, R.F.	TPO
Fox, M.A.	Manager, Quality Assurance Office
Straub, S.O.	Manager, Logistical Support Department
Barker, M.C.	Training Administrator, Training
Thompson, M.C.	Manager, Information Management Office

7.0 MEASURING AND TEST EQUIPMENT USED DURING THE SURVEILLANCE

None.

8.0 SYNOPSIS OF DEFICIENCY

The following four CARs were issued as a result of this surveillance:

<u>CAR</u>	<u>Deficiency</u>
YM-91-021	Failure to provide a position description for all individuals who are, or must be, certified as qualified to perform quality-affecting work.
YM-91-022	Failure to follow the procedural sequence in the certification of personnel as qualified to perform quality-affecting work.
YM-91-023	Conduct of quality-affecting activity prior to certification as qualified to do so.
YM-91-024	Failure to provide an interval between issuance or revision of a document and its implementation date so that personnel may be adequately trained; failure of individuals to complete reading assignments to maintain qualification.

9.0 RECOMMENDATIONS

As a result of this surveillance, the following recommendations are made:

1. Procedural compliance should be emphasized to REECo managers.

CAR YM-91-022 indicates a general lack of appreciation by REECo management that the procedural process (1) in the evaluation of job

requirements from the position description, (2) training and its completion, and (3) the subsequent certification of an individual as qualified to perform quality-affecting work, is also a logical process. When this process is violated, the individual is not qualified to perform quality-affecting work.

2. Completion of the system to track completion of training requirements by individuals should be given enhanced priority.

CAR YM-91-024 specifies a relatively large fraction of the staff is delinquent in completion of reading assignments. This is particularly true of the matrixed organizations. In view of REECO's early responsibilities for site characterization, the tracking system is needed immediately.

10.0 REQUIRED ACTIONS

Responses to the CARs delineated in Section 8.0 of this report are due within the time frame stated in Block 10 of each CAR, as detailed in the CAR transmittal letter. Upon response, and satisfactory verification of all remedial and corrective actions, the CARs will be closed and YMQAD will notify SNL (by letter) of the closure.

SAMPLE

Evaluation of Personnel Qualification and Certification

<u>Code</u>	<u>Organization</u>	<u>Number of staff</u>	<u>Number in sample</u>
580-001	Division office	3	0
CONSTRUCTION DEPARTMENT			
581-001	Department office	2	1
581-002	Construction Engineering	3	2
582-001	Surface/Underground	2	1
DRILLING DEPARTMENT			
583-001	Department office	8	3
583-027	Drilling Subrock Support	2	1
LOGISTICAL SUPPORT DEPARTMENT			
584-001	Department office	3	1
584-005	Procurement	4	2
584-010	Contract Administration	1	0
584-015	Training	1	1
584-020	Supply	1	0
CONTROL DEPARTMENT			
585-001	Department office	2	1
585-005	Scheduling/Estimating/Cost	3	0
585-015	Material Control	1	1
QUALITY ASSURANCE OFFICE			
586-001	Office	3	3
INFORMATION MANAGEMENT OFFICE			
587-001	Office	2	1
587-002	Local Records Center	3	1
587-003	Document Control	4	2
587-006	Mail Distribution Center	2	0
		50	21

Summary of Results for QP 2.2

Org. code	Staff member	Deficient Condition					Corrective Action Request
		PD	VD	A/Q	Q/V	Q/T	
581-001	Leonard, T. M.						
581-002	French, C. A. Rommel, R. R.				X	X	YM-91-022
582-001	Jessen, T. H.						
583-001	Mason, C. J. Scott, R. E. Watson, M. R.		X	S	S		None issued, See 4.0, 1.d
583-027	Roberts, W. C.	X	S		S		YM-91-021
584-005	Straub, S. O.					X	
584-005	Hannaway, D. C. McGoldrick, J. P.						
584-015	Barker, M. C.				X	X	
585-001	Gardella, B. R.						
585-015	Arnold, J. M.					X	
586-001	Fox, M. A. Hackbert, D. A. Moulder, M. D.						
587-001	Thompson, M. C.			X		X	YM-91-023
587-002	Warriner, D. R.				X		
587-003	Harvey, C. D. Zellers, T. M.				X	X	

X = Deficiency

S = Subsequent, unavoidable deficiency following the initial departure (labeled X) from the procedural sequence

PD = No position description exists

VD = Verification of education/experience requirements not accomplished

A/Q = Performance of quality affecting activity prior to Qualification of employee

Q/V = Qualification Record form completed before verification documentation was available that candidate did meet minimum education /experience requirements

Q/T = Qualification Record form completed before employee had finished initial training requirements

SAMPLE

Completion of Training Requirements Generated by New/Revised Program Documents

REECo DIVISION 580

MATRIXED ORGANIZATIONS

<u>Org. Code</u>	<u>Individual</u>	<u>Organization/Individual</u>
581-001	Leonard, T.M	
581-002	French, C.A.	Human Resources Lewis, L.E. Rainey, T.L.
582-001	Jessen, T.H.	
583-027	Roberts, W.C.	Power, Electricity, & Communications Fulwider, R.W. Gunthorpe, G.F.
584-001	Straub, S.O.	
584-005	Hannaway, D.C. McGoldrick, J.P.	QA-Weld & Physical Standards Labs Archeleta, S.E. Mueller, T.L.
584-015	Barker, M.C.	Operations Equipment Stethen, M.T. Lawson, C.G
585-001	Gardella, B.R.	
585-015	Arnold, J. M.	Industrial Hygiene Paz, J.
586-001	Fox, M.A. Hackbert, D.A. Moulder, M.D.	
587-002	Warriner, D.R.	
587-003	Harvey, C.D. Zellers, T.M.	

INCOMPLETE READING ASSIGNMENTS*

<u>Document</u>	<u>Revision</u>	<u>Individuals</u>		
QAAP	8	D.R. Warriner		
QP 1.0	7	D.R. Warriner M.C. Barker T.L. Rainey R.W. Fulwider	W.C. Roberts T.L. Mueller C.G. Lawson G.F. Gunthorpe	S.E. Archuleta M.T. Stethen L.E. Lewis
QP 9.2	4	T.L. Rainey	L.E. Lewis	
QP 3.3	2	M.T. Stethen	C.G. Lawson	
QP 5.2	2	R.W. Fulwider	G.F. Gunthorpe	
QP 8.0	5	M.T. Stethen T.L. Mueller	C.G. Lawson	S.E. Archuleta
QP 13.0	5	M.T. Stethen G.F. Gunthorpe	R.W. Fulwider	C.G. Lawson
QP 14.0	6	R.W. Fulwider	G.F. Gunthorpe	
QP 16.0	7	D.R. Warriner	T.H. Jessen	
AP-5.28Q	2	B.R. Gardella		

* These deficiencies are addressed in CAR No. YM-91-024 as Requirement and Adverse Condition A.

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

14CAR NO.: YM-91-022
 DATE: 2-26-91
 SHEET: 1 OF 2
 QA
 WBS No.: N/A

CORRECTIVE ACTION REQUEST

1 Controlling Document
YMP Quality Procedure QP 2.2, Rev. 5

2 Related Report No.
Surv. Rpt. YMP-SR-91-007

3 Responsible Organization
REECO

4 Discussed With
M. C. Barker, S. O. Straub, R. F. Pritchett

10 Response Due
March 25, 1991

11 Responsibility for Corrective Action
R. F. Pritchett, REECO TPO

12 Stop Work Order Y or N
No

5 Requirement:
 Procedure QP 2.2, section 6.1.6, states in part:
 "Upon receipt of the individual's education and experience history verification documentation and completion of the training requirements, the department manager shall complete the Qualification Record ..."

6 Adverse Condition:
 Contrary to this requirement, Qualification Records have been completed prior to (1) receipt of the verification documentation of education and experience:

Name	Completion of Qualification Record	Date of Verification
M. C. Barker	5-15-89	5-22-89
D. R. Warriner	4-10-89	5-19-89
C. A. French	3-27-89	4-01-89
R. R. Rommel	4-04-89	4-05-89
W. C. Roberts	10-11-90	None found
C. D. Harvey	2-16-90	9-17-90
T. M. Zellers	3-29-89	5-19-89 continued

7 Recommended Action(s):
 1. Investigate to determine the extent of the stated condition(s).
 2. Evaluate the affected Qualification Records to verify the validity of conclusions.
 Continued next page

8 Initiator
T. J. Higgins *[Signature]* Date: 2-26-91

9 Severity Level -
1 2 3

13 Approved By:
OQA *[Signature]* Date: 2-28-91

15 Verification of Corrective Action:

16 Corrective Action Completed and Accepted:
 QAR _____ Date _____

17 Closure Approved By:
 OQA _____

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

CAR NO.: YM-91-022
DATE: 2-26-91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

6 Adverse Condition (continued)

(2) the completion of initial Training Requirement Assignments:

Name	Completion of Qualification Record	Initial Training Requirements Completion
S. O. Straub	3-21-89	5-19-89
C. A. French	3-27-89	5-11-89
R. R. Rommel	4-04-89	5-18-89
C. D. Harvey	2-16-90	2-28-90
M. C. Thompson	3-30-89	8-15-89
M. C. Barker	5-15-89	5-19-89
T. M. Arnold	12-14-89	12-19-89

7 Recommended Action(s) (continued)

3. Determine the cause of the failure to meet procedural requirements.
4. Insititute Corrective Action to prevent recurrence.

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

14CAR NO.: YM-91-023
 DATE: 2-26-91
 SHEET: 1 OF 2
 QA
 WBS No.: N/A

CORRECTIVE ACTION REQUEST

1 Controlling Document YMP Quality Procedure QP 2.2, Rev. 5	2 Related Report No. Surv. Rpt. YMP-SR-91-007
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3 Responsible Organization REECo	4 Discussed With M. C. Barker, M. C. Thompson, R. F. Pritchett
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10 Response Due March 25, 1991	11 Responsibility for Corrective Action R. F. Pritchett, REECo TPO	12 Stop Work Order Y or N No
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5 Requirement:
 Procedure QP 2.2, Section 6.1.4, states:
 "Completion of indoctrination and training is a prerequisite to completion of the Qualification Record, Exhibit 1, and the initiation of activities that affect quality."

6 Adverse Condition:
 Contrary to this requirement, quality affecting activity was performed before these requirements were met. The YMP Information Management Office Manager made an initial Training Requirements Assignment (6-06-89) and completed the Qualification Record (3-29-89) for T. M. Zellers, Mail and Records Branch Chief, before the Information Management Office Manager had completed her own initial training.

7 Recommended Action(s):
 1. Investigate to determine all instances of the stated condition.
 2. Evaluate the effect on any quality affecting work.
 Continued next page.

8 Initiator T. J. Higgins <i>[Signature]</i>	Date: <u>2-26-91</u>	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: OQA <i>[Signature]</i>	Date: <u>2-28-91</u>
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18 Verification of Corrective Action:

16 Corrective Action Completed and Accepted: OAR _____ Date _____	17 Closure Approved By: OQA _____
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**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

CAR NO.: YM-91-023
DATE: 2-26-91
SHEET: 2 OF 2

**CORRECTIVE ACTION REQUEST
(continuation sheet)**

7 Recommended Action(s) (continued)

3. Evaluate possible remedial action for items 1 and 2.
4. Initiate and complete corrective action to prevent recurrence.

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

14 CAR NO.: YM-91-024
 DATE: 2/26/91
 SHEET: 1 OF 2
 QA
 WBS No.: N/A

CORRECTIVE ACTION REQUEST

1 Controlling Document REECO 568-DOC-115, Rev. 8 & QP 2.4, Rev. 1		2 Related Report No. YMP-SR-91-007	
3 Responsible Organization REECO		4 Discussed With S.O. Straub	
10 Response Due 3/25/91	11 Responsibility for Corrective Action S.O. Straub, Mgr. Log. Sup. Dept.	12 Stop Work Order Y or N No	
5 Requirement: A. 568-DOC-115, Revision 8, Section II, paragraph 5.1.3 states, "Prior to assigning personnel to perform activities affecting quality, they shall be indoctrinated as to the purpose, scope, methods of implementation, and applicability of the following documents, (including changes thereto) as a minimum, as they relate to the work to be accomplished by the use of a mandatory reading list, by group classroom presentations, by video presentation, or other instructional methods. o QAPPs o Implementing Procedures and Work Instructions (applicable to the individual's responsibilities). (Con't)			
6 Adverse Condition: A. Personnel were not indoctrinated to the changes of the following documents after their initial training: AP-5.28Q, Revision 2 - Bruce Gardella QAAP, Revision 8 (568-DOC-115) - David R. Warriner QP 1.0, Revision 7 - David R. Warriner, William C. Roberts, Samuel E. Archuleta, Connie Barker (Completed during the surveillance), Terry L. Mueller, Michael T. Stethen, Trudie L. Rainey, Clark G. Lawson, Lavonne E. Lewis, Robert W. Fulwider, Guy F. Gunthorpe QP 9.2, Revision 4 - Trudie L. Rainey, Lavonne E. Lewis (Con't)			
7 Recommended Action(s): Identify the remedial action(s) to be taken to correct the deficiencies noted in Block 6. Investigate the program process, activities or documentation to determine the extent and depth of similar deficient conditions on the CAR. (Con't)			
8 Initiator A.I. Arceo	Date: <i>2/26/91</i>	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: <i>[Signature]</i> Date: <i>2-26-91</i>
15 Verification of Corrective Action:			
16 Corrective Action Completed and Accepted: QAR _____ Date _____		17 Closure Approved By: OQA _____	

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

CAR NO.: YM-91-024
DATE: 2/26/91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

5 Requirements (continued)

- A. (continued from previous page)
- o Regulations
 - o Project Level Documents"
- B. QP 2.4, Revision 1, paragraph 6.2.4, "Training of personnel to address program document changes shall be accomplished prior to implementation of the affected changes."

6 Adverse Condition (continued)

- A. (Continued from previous page)
- QP 3.3, Revision 2 - Michael T. Stethen, Clark G. Lawson
- QP 5.2, Revision 2 - Robert W. Fulwider, Guy F. Gunthorpe
- QP 8.0, Revision 5 - Michael T. Stethen, Clark G. Lawson, Samuel E. Archuleta, Terry L. Mueller
- QP 13.0, Revision 5 - Michael T. Stethen, Robert W. Fulwider, Clark G. Lawson, Guy F. Gunthorpe
- QP 14.0, Revision 6 - Robert W. Fulwider, Guy F. Gunthorpe
- QP 16.0, Revision 7 - David R. Warriner, Timothy H. Jessen
- B. Training of personnel to address program document changes was not accomplished prior to implementation of the affected changes to the QAPP and procedures enumerated in adverse condition A.

7 Recommended Action(s) (continued)

Identify these deficiencies and provide the measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

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