



Department of Energy

Washington, DC 20585

AUG 26 1993

WBS 1.2.11

QA: N/A

James L. Robertson, General Manager
 Civilian Radioactive Waste Management Systems
 Management and Operating Contractor
 TRW Environmental Safety Systems, Inc.
 2650 Park Tower Drive, Suite 800
 Vienna, VA 22180

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-93-070
 RESULTING FROM OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM)
 OFFICE OF QUALITY ASSURANCE (OQA) TREND REPORT (SCP: N/A)

The Yucca Mountain Quality Assurance Division staff has evaluated the response to CAR YM-93-070. The response to Parts A, B, and C has been determined to be unsatisfactory due to the lack of sufficient information as follows:

1. General:

Your overall response addresses only one part of the cited condition in CAR YM-93-070. That is, the problem with flow-down of upper-tier requirements. Your response does not address the performance of quality-affecting activities in the absence of approved procedures. Please provide a detailed response indicating the cause, what actions you intend to take, and the long-term action to prevent recurrence. This will assure that all quality-affecting activities will be performed in accordance with approved procedures prior to the start of work. Also, provide the rationale as to why the Civilian Radioactive Waste Management System Management and Operating Contractor (CRWMS M&O) was not able to detect this problem through its Quality Assurance (QA) verification process.

Also, your response does not address the long-term process which the CRWMS M&O plans to implement to verify the corrective action(s) taken are effective in resolving the noted trend. Please provide a detailed response indicating the methods to be employed by the CRWMS M&O to assure long-term effectiveness of implemented corrective actions.

2. Part A, second paragraph of your response states in part: "As a result of OQA CARs HQ-93-13 and HQ-93-18, M&O procedure QAF-5-1 was extensively revised to correct weaknesses in the procedure that contributed to the procedural deficiencies cited by OQA."

Could you please provide specific examples regarding the weaknesses found?

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3. Part A, second paragraph of your response states in part: ". . . the procedure review process was greatly enhanced with the formation of the Quality Review Board (QRB), which is chaired by the M&O QA Manager"

Besides the CRWMS M&O QA Manager, who are the others that participate on this board and do the organizations represent all CRWMS M&O divisions (i.e., Las Vegas, Charlotte, Vienna) including representation from the U.S. Department of Energy?

4. Part A, third paragraph of your response states in part: "Using the revised QAP-5-1 and the new QAP-5-2, all M&O QAPs and ILPs are being reviewed against the deficiencies of the applicable OQA and M&O generated CARs"

Part B, first paragraph of your response states in part: "All OCRWM and M&O generated CARs"

Part C, first paragraph of your response states in part: "The review of the cited CARs plus the other OCRWM and M&O generated CARs on deficient procedures"

Please identify what OQA and CRWMS M&O-generated CARs you are referring to. Also, is this review being documented to trace deficiencies to affected procedures?

5. Part A, third paragraph of your response states in part: "Resulting procedures which met both the RW-0214 QARD and the new QARD have been approved and issued."

What specific procedures does this statement refer to?

6. Note:

Prior to completion of this evaluation, it was pointed out that there was an inconsistency between the response provided to CAR YM-93-070 and the Design Control Improvement Plan Progress Update dated August 13, 1993. The response to the CAR indicates that modifications made to Quality Assurance Procedure (QAP) 5-1 and the addition of QAP 5-2 will be instrumental in bringing the program under control; however, the Design Control Improvement Plan Progress Update has identified problems with the procedure review process. Please include in your response the actions taken to eliminate this kind of conflict in the future.

To involve the same management level as was intended on issuance, OCRWM QA requests that all future correspondence regarding this CAR be approved and transmitted under a cover letter to the OQA, OCRWM, from the CRWMS M&O General Manager. The seriousness of this problem is considered to warrant top management involvement and correspondence from the CRWMS M&O should demonstrate this posture.

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An amended response is required to be submitted to this office within ten working days of the date of this letter. Send the original of your response to Nita J. Brogan, Quality Assurance Technical Support Services, 101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109. If an extension to the due date is necessary, it must be requested in writing, with appropriate justification, prior to that date.

If you have any questions, please contact either me at (702) 794-7675 or Richard L. Maudlin at (702) 794-7290.



Donald G. Horton, Director
Office of Quality Assurance

YMQAD:RBC-5775

Enclosure:
CAR YM-93-070

cc w/encl:

R. W. Clark, HQ (RW-3.1) FORS
Trudy Wood, HQ (RW-52) FORS
R. J. Brackett, M&O/Duke, Vienna, VA
L. D. Foust, M&O/TRW, Las Vegas, NV
J. A. Jackson, M&O/TRW, Las Vegas, NV
Richard Jiu, M&O/TRW, Las Vegas, NV

cc w/o encl:

J. W. Gilray, NRC, Las Vegas, NV
N. J. Brogan, YMQAD/QATSS, Las Vegas, NV