Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 98608
Las Vegas, NV 89193-8608

WBS 9.1.2
QA: N/A

MAY 24 1994

Robert M. Nelson, Jr., Acting Project Manager, YMSCO, NV
ATTN: H. Kenneth Elder, AMSL, YMSCO, NV

ISSUANCE OF SURVEILLANCE RECORD YMP-SR-94-044 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) SURVEILLANCE OF THE YUCCA MOUNTAIN SITE CHARACTERIZATION OFFICE (YMSCO) (SCP: N/A)

Enclosed is the record of Surveillance YMP-SR-94-044 conducted by the YMQAD at the YMSCO facilities in Las Vegas and the Field Operations Center, Area 25, Nevada, March 25 through April 22, 1994.

The purpose of the surveillance was to verify compliance to the requirements of Yucca Mountain Administrative Procedure 15.1Q, Revision 0, Interim Change Notice No. 1, "Control of Nonconformances."

No Corrective Action Requests were issued as a result of this surveillance.

This surveillance is considered completed and closed as of the date of this letter. A response to this surveillance record and any documented recommendations is not required.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Fred H. Lofftus at 794-7190.

Robert B Constable for.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-3608

Enclosure:
Surveillance Record YMP-SR-94-044

Add: Bill Belke Hr Encl
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Surveillance No. YMP-SR-94-44

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

QUALITY ASSURANCE SURVEILLANCE RECORD

SURVEILLANCE DATA

[1]ORGANIZATION/LOCATION:	[2]SUBJECT:	[3]DATE:
Yucca Mountain Site Characterization Office (YMSCO)	Nonconformance Reports (NCRs)	3/25/94 through 4/22/94

[4]SURVEILLANCE OBJECTIVE:
To verify compliance to the requirements of the Yucca Mountain Administrative Procedure (YAP)-15.1Q, Revision 0, Interim Change Notice (ICN) 1, Control of Nonconformances, effective December 1, 1993.

[5]SURVEILLANCE SCOPE:
The purpose of this surveillance was to evaluate compliance and process adequacy of the NCR system to the requirements of YAP-15.1Q since December 1, 1993.

[6]SURVEILLANCE TEAM:
Team Leader:
Fred H. Lofftus
Additional Team Members:
N/A

[7]PREPARED BY:
Fred H. Lofftus — 3/24/94
Surveillance Team Leader — Date

[8]CONCURRENCE:
Robert B. Enstable for — 3/24/94
QA Division Director — Date

SURVEILLANCE RESULTS

[9]BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:

See Page(s) 2 and 3

[10]SURVEILLANCE CONCLUSIONS:

See Page(s) 3 and 4

[11]COMPLETED BY:
Fred H. Lofftus — 5/19/94
Surveillance Team Leader — Date

[12]APPROVED BY:
Robert B. Enstable for — 2-23-94
QA Division Director — Date

ENCLOSURE

(Block 9 Continued) BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:

This surveillance was initiated on March 25, 1994 to verify compliance to the requirements of YAP-15.1Q, Revision 0, ICN 1, Control of Nonconformances, effective December 1, 1993. Thirty-six NCRs were evaluated as part of this investigation. The system of controlling nonconforming items appears to be effective; however, it has become obvious that there is a general misunderstanding and considerable confusion regarding the procedural requirements as to when a technical justification is required and how it shall be written. See Item "b" under Recommendations.

It was noted that there is conflict between YAP-15.1Q and Quality Assurance Procedure (QAP) 17.1, Revision 3 when it becomes necessary to correct minor, or editorial errors in a completed document in the Local Records Center (LRC) files. See Item "c" under Recommendations for details.

There are no time restraints incorporated into YAP-15.1Q; however, it is still expected that the participants will respond to an NCR in a timely manner. It was noted that there are a number of NCRs initiated in February for which a response has yet to be received. The person responsible for these NCRs will be advised of the situation.

There appears to be a general misunderstanding as to what YAP-15.1Q requirements will apply to non-Q type NCRs. It is a QATSS position that all NCRs will be treated alike, yet the rigid procedural requirements applied to Q-type NCRs are not being enforced when it comes to non-Q type NCRs. NCR 94-0020 (non- Q) disposition was repair yet a technical justification was not supplied per the requirements of YAP-15.1Q, Paragraph 6.1.3. See Item "a" under Recommendations.

It was noted that the various NCRs are not being numbered in the same manner nor are they being numbered per the requirements of YAP-15.1Q (see Page 14 of the procedure). For the purpose of computer retrieval, the identification system must be consistent. Prior to the completion of this report, all NCRs previously submitted to the LRC were reviewed and correctly numbered. Unsubmitted NCRs will be monitored by QATSS and corrected if necessary prior to submittal to LRC.

No CARs were initiated as the result of this investigation. Three recommendations are submitted for managerial consideration.

Personnel contacted during this surveillance:

J. W. Hays, Quality Assurance, Management and Operating (M&O) contractor
D. J. Tunney, Supervisor Quality Assurance, Raytheon Services Nevada
J. E. Clark, Quality Assurance Liaison, Radiological and Environmental Field Program Department, Technical and Management Support Services (T&MSS) Contractor

Personnel contacted during this surveillance: (Continued)

R. R. Rinderman, Lead Quality Engineer, T&MSS
K. W. Roesner, Technician II, Radiological Environmental Field Program Department, T&MSS
F. M. Beason, Quality Assurance, M&O
W. A. Waggoner, Quality Assurance, M&O
H. A. Asgarian, Civil Design Engineer, M&O
A. T. Watkins, Architect/Engineer, M&O
A. C. Williams, Yucca Mountain Quality Assurance Division (YMQAD)
D. E. Sestak (Lead) Quality Assurance, M&O
J. S. Martin, Quality Assurance Specialist, QATSS
R. E. Spence, Director, YMQAD
R. L. Maudlin, Quality Assurance Specialist , QATSS

(Block 10 Continued) SURVEILLANCE CONCLUSIONS:

The status of the 36 NCRs evaluated during this surveillance is indicated below:

Twenty open NCRs:

RSN 94-0001	T&MSS 94-0001Q
T&MSS 94-0004Q	T&MSS 94-0005Q
T&MSS 94-0006Q	YMPO 94-0002Q
YMPO 94-0004Q	YMPO 94-0005
YMPO 94-0009Q	YMPO 94-0010Q
YMPO 94-0012	YMPO 94-0013Q
YMPO 94-0014	YMPO 94-0015Q
YMPO 94-0022	YMPO 94-0025
YMPO 94-0027	YMPO 94-0028*
YMPO 94-0029	YMPO 94-0026*

* Yet to be received, NCR numbers issued.

Two NCRs were invalidated:

YMPO 94-0011
YMPO 94-0021

(Block 10 Continued) SURVEILLANCE CONCLUSIONS: (Continuation)

Fourteen closed NCRs:

T&MSS 94-0002Q	T&MSS 94-0003Q
YMPO 94-0001Q	YMPO 94-0003
YMPO 94-0006Q	YMPO 94-0007
YMPO 94-0008	YMPO 94-0016
YMPO 94-0017	YMPO 94-0018
YMPO 94-0019	YMPO 94-0020
YMPO 94-0023	YMPO 94-0024Q

The fifteen quality affecting NCRs above are so indicated with the suffix "Q."

During this surveillance, compliance to YAP-15.1Q, Revision 0, ICN 1, was verified, with the exception of a noncompliance with the requirements for NCR numbering which was corrected during the surveillance. In addition, several opportunities for improvement were identified and documented in the recommendations listed below.

Recommendations:

a) It is recommended that if non-Q NCRs are not to be subjected to the same rigid procedural requirements that are imposed on Q-type NCRs, then guidelines must be spelled out and clarified.

b) It was noted that there is considerable confusion and difference of opinion as to what constitutes a Technical Justification, under what circumstances is it required and who should write it. For this reason it is recommended that a YAP-15.1Q training class be held with compulsory attendance with at least two representatives from each participant who are responsible for dispositioning NCRs. Special emphasis is to be placed on 1) timely response to an open NCR, and 2) when is a technical justification required, and how it will be written, and by whom.

c) It is recommended that conflict between QAP-17.1, Revision 3, Section 5.8 which allows for editorial corrections of a closed NCR already submitted to LRC and the YAP-15.1Q, Section 6.2 requirements that require a new NCR to be initiated and submitted to the LRC when any kind of a correction is made, including minor and editorial changes.

MAY 24 1994

cc w/encl:
D. A. Dreyfus, HQ (RW-1) FORS
R. W. Clark, HQ (RW-3.1) FORS
J. W. Gilray, NRC, Las Vegas, NV
W. L. Belke, NRC, Washington, DC
R. R. Loux, NWPO, Carson City, NV
Cyril Schank, Churchill County Commission, Fallon, NV
D. A. Bechtel, Clark County Comprehensive, Las Vegas, NV
J. D. Hoffman, Esmeralda County, Goldfield, NV
Eureka County Board of Commissioners,
Yucca Mountain Information Office, Eureka, NV
Lander County Board of Commissioners, Battle Mountain, NV
Jason Pitts, Lincoln County, Pioche, NV
V. E. Poe, Mineral County, Hawthorne, NV
P. A. Niedzielski-Eichner, Nye County, Chantilly, VA
L. W. Bradshaw, Nye County, Tonopah, NV
William Offutt, Nye County, Tonopah, NV
Florindo Mariani, White Pine County, Ely, NV
B. R. Mettam, County of Inyo, Independence, CA
Mifflin and Associates, Las Vegas, NV
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R. E. Monks, LLNL, Livermore, CA
W. J. Glasser, REECo, Las Vegas, NV
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