



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

QA: L

JUN 30 1994

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

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF CORRECTIVE
ACTION REQUEST (CAR) YM-93-004 RESULTING FROM YUCCA MOUNTAIN
QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-92-24 (SCPB: N/A)

The YMQAD staff has verified the corrective action to
CAR YM-93-004 and determined the results to be satisfactory.
A surveillance will be conducted, within three months, to verify
the implementation of and completion of training to YAP 17.1Q.
The CAR is considered closed.

If you have any questions, please contact either Robert B.
Constable at 794-7945 or Amelia I. Arceo at 794-7737.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-4077

Enclosure:
CAR YM-93-004

cc w/encl:

W. ~~B. Beike~~, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
J. W. Estella, SAIC, Las Vegas, NV
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J. W. Gilray, NRC, Las Vegas, NV
D. G. Sult, YMQAD/QATSS, Las Vegas, NV

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YMP-5

9407120109 940630
PDR WASTE
WM-11 PDR

Add: Bill Beike for End
NH03-11
102.7
WM-11

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

8 CAR NO.: YM-93-004
DATE: 10/6/92
SHEET: 1 OF 2
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document: QAPD, Revision 3, and AP-1.18Q, Revision 1	2 Related Report No. YMP-92-24
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3 Responsible Organization YMFO	4 Discussed With C. Gertz
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5 Requirement:

QAPD, Revision 3, Section 17.0, Paragraph 17.3, states in part: "Documents designated to become records are to be legible, identifiable, accurate, complete, reproducible, microfilmable, and appropriate to the work accomplished."

AP-1.18Q, Revision 1, Paragraph 5.6, states in part: "Prepare the individual records or records package in accordance with Appendix A...." Appendix A, Item 1, requires that draft documents be stamped "DRAFT" on their first page of the draft document.

6 Adverse Condition:

Contrary to the above, the following records deficiencies were found:

Records or portions of records were illegible:

NNA 920807.0066, Study Plan 8.3.1.17.4.5
NNA 920807.0076, Job Package 92-12

Records package was incomplete (missing pages):

NNA 920807.0076, Job Package 92-12

Record not identified correctly (not stamped "DRAFT"):

NNA 920807.0066, Draft Study Plan 8.3.1.17.4.5 (Continued)

9 Does a significant condition adverse to quality exist? Yes <u>X</u> No <u> </u> If Yes, Circle One: <u>(A)</u> B C	10 Does a stop work condition exist? Yes <u> </u> No <u>X</u> ; If Yes - Attach copy of SWO If Yes, Circle One: A B C D	11 Response Due Date: 20 working days from issuance
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12 Required Actions: ☒ Remedial ☒ Extent of Deficiency ☒ Preclude Recurrence ☒ Root Cause Determination

13 Recommended Actions:
Identify the remedial actions to be taken to correct the deficiencies noted in Block 6. Investigate the program processes, activities or documentation to determine the extent and depth of similar conditions as noted in Block 6. Identify these deficiencies and provide the measures to correct them.

(Continued)

7 Initiator Amelia I. Arceo Date <u>10/6/92</u>	14 Issuance Approved by: QADD <u>R.C. Spence</u> Date <u>10/8/92</u>
15 Response Accepted QAR <u>Amelia I. Arceo</u> Date <u>12/9/92</u>	16 Response Accepted QADD <u>R.C. Spence</u> Date <u>12/15/92</u>
17 Amended Response Accepted QAR <u>Amelia I. Arceo</u> Date <u>2/9/93</u>	18 Amended Response Accepted QADD <u>R.C. Spence</u> Date <u>2/11/93</u>
19 Corrective Actions Verified QAR <u>Amelia I. Arceo</u> Date <u>6/28/94</u>	20 Closure Approved by: QADD <u>R.C. Spence</u> Date <u>6/29/94</u>

ENCLOSURE

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CORRECTIVE ACTION REQUEST (Continuation Page)

6 Adverse Condition (continued)

DISCUSSION:

While it has always been an upper-tier requirement for records to be legible, it was realized (CAR YM-91-065) that certain "one of a kind records" with portions which were illegible, should be retained. This was only to be utilized for unique records where these illegible portions could not be transcribed or enhanced, and it was thought that those portions which were legible would be of benefit to the Project. However, in the allowance of a system to provide a means by which these unique records could be transmitted into the Records Center, it has become standard practice among DOE and Participants to abuse the system.

In the conduct of this audit, it was found that the statement, "I have reviewed this record/records package and it is adequate for its intended purpose. All blanks are intentional. Any illegible, uncorrected, or incomplete information does not impact future, in-process, or completed work" is being utilized "carte blanche" for records and not just for those unique "One of a kind records" which contained deficiencies which would not meet the requirements of the QAPD and NQA-1.

13 Recommended Action(s) (continued)

Identify the cause of the condition and the planned corrective action to prevent recurrence.

NOTE: Response to the above must include and consider all participants as the deficiencies, as detected herein, is considered Project-wide.



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WBS 1.2.11
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DEC 03 1992

DEC 04 1992

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

RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-93-004

Following are the actions proposed to be taken to correct the adverse conditions identified in CAR YM-93-004:

1. Remedial Action - A legible copy of NNA 920807.0066, Study Plan 8.3.1.17.4.5, indicated as "Draft," will be resubmitted for microfilming. The new submittal will supersede the current illegible record. The Yucca Mountain Site Characterization Project Office (YMPO) will be responsible for resubmitting this record to the Las Vegas Local Records Center (LVLRC) by December 11, 1992.

Job Package 92-12 will be resubmitted in its entirety and will encompass all missing pages. The new submittal of this record will supersede NNA 920807.0076. YMPO will be responsible for resubmitting this record to the LVLRC by December 11, 1992.

2. Investigative Action - Based on daily observations, participants have abused the use of the illegible and incomplete statement contained in Administrative Procedure (AP) 1.18Q which allows for entry of illegible and incomplete records into the permanent record system.

The omission of the "Draft" from the record appears to have been an oversight by the record source. Further investigation will be performed to ensure that this was an isolated occurrence. YMPO will be required to submit a list of current Study Plans to LVLRC by December 11, 1992. LVLRC will review one-third of this list on microfilm to verify that any Study Plan submitted as a draft has the word "Draft" stamped on the first page. This action will be completed by December 30, 1992.

3. Root Cause - AP 1.18Q, page 19, Appendix C, Correction of Records, Part I, Item 2, revised in Interim Change Notice 1, allows for entry of deficient records by all Las Vegas record sources. All participants have implementing procedures which allow for the same disposition of these records. Outside participants have their own procedures which allow for entry of such records.

The root cause for the "Draft" item referred to in Item 2 above will be addressed no later than December 30, 1992, after the investigative action for that item has been completed.


Richard E. Spence

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4. Corrective Action to Preclude Recurrence - AP 1.18Q, which is applicable to all Las Vegas participants, will be revised by January 30, 1992, and have more stringent requirements for submitting illegible or incomplete records. A directive to all participants, including outside laboratories, will be prepared directing all participants to revise their procedures to conform to the same requirements that will be contained in AP 1.18Q. Training requirements will be assigned in accordance with Quality Management Procedure 02-01.

If you have any questions, please contact John G. Gandi at 794-7954.


Carl P. Gertz
Project Manager

YMP:JGG-1312

CC:

N. J. Brogan, SAIC, Las Vegas, NV
W. B. Simecka, YMP, NV
A. V. Gil, YMP, NV
B. J. Verna, YMP, NV

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CORRECTIVE ACTION REQUEST (Continuation Page)

1. Corrective Action Response for CAR #YM-93-004

- A. Remedial Action - A legible copy of NNA 920807.0066, Study Plan 8.3.1.17.4.5, indicated as "Draft," will be resubmitted for microfilming. The new submittal will supersede the current illegible record. The Yucca Mountain Site Characterization Project Office (YMPO) will be responsible for resubmitting this record to the Las Vegas Local Records Center (LVLRC) by December 11, 1992.

Job Package 92-12 will be resubmitted in its entirety and will encompass all missing pages. The new submittal of this record will supersede NNA 920807.0076. YMPO will be responsible for resubmitting this record to the LVLRC by December 11, 1992.

- B. Investigative Action - Based on daily observations, participants have abused the use of the illegible and incomplete statement contained in Administrative Procedure (AP) 1.18Q which allows for entry of illegible and incomplete records into the permanent record system.

The omission of the "Draft" from the record appears to have been an oversight by the record source. Further investigation will be performed to ensure that this was an isolated occurrence. YMPO will be required to submit a list of current Study Plans to LVLRC by December 11, 1992. LVLRC will review one-third of this list on microfilm to verify that any Study Plan submitted as a draft has the word "Draft" stamped on the first page. This action will be completed by December 30, 1992.

- C. Root Cause - AP 1.18Q, page 19, Appendix C, Correction of Records, Part I, Item 2, revised in Interim Change Notice 1, allows for entry of deficient records by all Las Vegas record sources. All participants have implementing procedures which allow for the same disposition of these records. Outside participants have their own procedures which allow for entry of such records.

Ltr dtd 12/9/92 - YMP:JGG-1428

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The root cause for the "Draft" item referred to in Item 2 above will be addressed no later than December 30, 1992, after the investigative action for that item has been completed.

- D. Corrective Action to Preclude Recurrence - AP 1.18Q, which is applicable to all Las Vegas participants, will be revised by January 30, 1992, ^{3, 8th} 12/8/92 and have more stringent requirements for submitting illegible or incomplete records. A directive to all participants, including outside laboratories, will be prepared directing all participants to revise their procedures to conform to the same requirements that will be contained in AP 1.18Q. Training requirements will be assigned in accordance with Quality Management Procedure 02-01.

2. The individual responsible for assuring that the above completion dates are met is Lynda J. Lee, M&O Project Records Center Manager, Civilian Radioactive Waste Management System Management and Operating Contractor.

3. Response Approved:


Responsible Manager

Date: 12/9/92

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WASHINGTON, D.C.

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CORRECTIVE ACTION REQUEST (Continuation Page)

1. Corrective Action Response for CAR #YM-93-004

B. Investigative Action - Follow-Up

The Local Records Center (LRC) received the list of current Study Plans from the Yucca Mountain Site Characterization Project Office (YMPO) and reviewed one-third of this list. Upon completion of this task, it was discovered that all of the records reviewed lacked "Draft" indication on the first page as required by procedures.

C. Root Cause

Root Cause for items not being stamped "Draft" is that records generated by Participants and submitted to YMPO for review and comment are not considered "Drafts" by the particular Participant and, therefore, are not stamped "Draft."

D. Remedial Action

Participants shall be reminded, via formal directive by YMPO, to follow the Records Management Plan, Appendix A, Identification, Preparation, Submittal, and Correction of Records, Paragraph A.3.4 DRAFT DOCUMENTS, page A-5, "For Participants other than DOE: 1. The version submitted by the Participant to the DOE as a deliverable for review and comment shall be considered the draft. Previous versions. . ."

As a corrective measure, we would recommend that LRC view the remaining records, determine which records require resubmittal indicating "Draft," submit that list to YMPO and YMPO will resubmit the corrected records and Table of Contents to LRC for refilming.

The completion of this activity is scheduled for March 30, 1993. The individual responsible for assuring that the above completion date is met is Lynda J. Lee, M&O Project Records Center Manager, Civilian Radioactive Waste Management and Operating Contractor.

Ltr dtd 1/14/93 - YMP:JGG-1848

1/14/93
12/9/92
[Signature]

REV. 08/91

ENCLOSURE

Verification of Corrective Action
CAR-YM-93-004
Page 1 of 1

1. Remedial Actions:

Verified that Records Package NNA.930111.0086 (Microfilm No. 91118 - 2499 thru 91118-2561) was noted with a statement "Correction to NNA.920807.0066 Roll 91064-2050 thru 91064-2111." Study Plan 8.3.1.17.4.5. "Detachment Faults at or Proximal to Yucca Mountain," Records Package was authenticated by Richard Crawley on 12/17/92.

Verified that Records Package NNA.930111.0087 (Microfilm No. 91118 -2562 thru 91118-2652) was noted with a statement "Supersedes Records Package NNA.920807.0076 Records Package Segment for JP 92-12, "Quaternary Faulting within the Site Area." Documentation acquired prior to final signature approval. Package was authenticated by John M. Savino on 12/17/92.

2. Investigative Actions:

Reviewed Interoffice Memorandum dated 2/9/93 from Toni Caselli to Ralph Rogers which listed 43 accession numbers of Study Plans (SP) which were submitted, 23 of which contained draft versions which were not stamped "Draft." Verified that the following Records Packages were corrected on 3/5/93.

Records Package Accession Number	SP Number	Revision	Corrected Records Records Package
NNA.930315.0055	8.3.1.2.1.1	0	NNA.920109.0105
NNA.930315.0054	8.3.1.2.1.3	0	NNA.920109.0112
NNA.930315.0053	8.3.1.2.1.4	0	NNA.920127.0039
NNA.930315.0037	8.3.1.2.2.3	0	NNA.920708.0023
NNA.930315.0052	8.3.1.2.2.5	0	NNA.920522.0077
NNA.930315.0052	8.3.1.2.2.6	0	NNA.910905.0104
NNA.930315.0050	8.3.1.2.2.7	0	NNA.921204.0066
NNA.930315.0036	8.3.1.2.2.8	0	NNA.920824.0070
NNA.930315.0049	8.3.1.2.3.1.1-6	0	NNA.910606.0001
NNA.930315.0035	8.3.1.3.2.2	0	NNA.920127.0040
NNA.930315.0034	8.3.1.3.4.2	0	NNA.921217.0046
NNA.930315.0033	8.3.1.3.7.1	0	NNA.920824.0067
NNA.930315.0038	8.3.1.4.2.1	0	NNA.920807.0064
NNA.930315.0039	8.3.1.5.1.2	0	NNA.920313.0049
NNA.930315.0040	8.3.1.5.1.4	0	NNA.910904.0163
NNA.930315.0041	8.3.1.5.2.1	1&2	NNA.921130.0059
NNA.930315.0042	8.3.1.5.2.2	0	NNA.921130.0039
NNA.930315.0043	8.3.1.12.2.1	0	NNA.910722.0151
NNA.930315.0044	8.3.1.14.2	0	NNA.911218.0003
NNA.930315.0045	8.3.1.15.1.3	0	NNA.910820.0017
NNA.930315.0046	8.3.1.17.3.1	0	NNA.920127.0008
NNA.930315.0047	8.3.1.17.4.5	0	NNA.920807.0066
NNA.930315.0048	8.3.1.17.4.6	0	NNA.920422.0099


Amelia I Arceo 8/18/93



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Yucca Mountain Site Characterization Office
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Las Vegas, NV 89193-8608

WBS 1.2.12
QA: N/A

MAY 25 1994

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Larry R. Hayes, USGS, Las Vegas, NV
Julie A. Canepa, LANL, Los Alamos, NM
Michael D. Voegelé, SAIC, Las Vegas, NV
Daniel L. Koss, REECO, Las Vegas, NV
Les E. Shephard, SNL, Albuquerque, NM, M/S 1330
William C. Kopatich, RSN, Las Vegas, NV
L. Dale Foust, M&O/TRW, Las Vegas, NV

INCORPORATION OF YAP-17.1Q, RECORDS MANAGEMENT REQUIREMENTS
AND RESPONSIBILITIES, INTO AFFECTED ORGANIZATIONS' RECORDS
MANAGEMENT IMPLEMENTING PROCEDURES (SCP: N/A)

YAP-17.1Q, Records Management Requirements and Responsibilities,
has been issued and supersedes AP-1.18Q, Records Management:
Las Vegas Record Source Responsibilities. This procedure was
revised for two reasons:

1. In response to Corrective Action Request YM-93-004,
requirements have been included to ensure that affected
organizations produce records that meet the requirements
for legibility and completeness, or identify the specific
pages that do not meet these requirements and evaluate
the impact.
2. In response to section 17.0 of the Quality Assurance
Requirements and Description, DOE/RW-0333P, the new
requirements for quality assurance records have been
incorporated.

YAP-17.1Q differs from AP-1.18Q in two other significant ways.
First, the new procedure is applicable to all Yucca Mountain Site
Characterization organizations, whereas AP-1.18Q applied only to
those organizations based in Las Vegas, Nevada. Second, the new
procedure, to the degree possible, identifies requirements but
does not describe how to meet these requirements, whereas
AP-1.18Q included detailed instructions on processes and
activities. As its title indicates, the new procedure
establishes requirements and responsibilities but leaves the
detailed instructions to be included in each organization's
implementing procedures.


MAY 25 1994

Multiple Addressees

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This is in line with current policies, and your organization must review your records management implementing procedure(s), make the necessary changes based on YAP-17.1Q, and ensure that all appropriate personnel are made aware of the changes.

Records management personnel at each organization have been very involved in the development of this procedure and have provided valuable comments and recommended revisions. This effort is greatly appreciated. The revised procedure will result in a more effective and workable records management program. Should you or your staff have questions or concerns, please contact David R. Warriner at (702) 794-7950.


Marshall E. Bishop
Assistant Manager
for Administration

AMA:DRW-3536

CC:

D. J. Graser, HQ (RW-12) FORS
C. E. Ezra, EG&G/EM, Las Vegas, NV
J. L. Wiggins, EG&G/EM, Las Vegas, NV
W. K. Ostler, EG&G/EM, Las Vegas, NV
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MAY 25 1994

Multiple Addressees

-3-

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C. L. Sellards, SAIC, Las Vegas, NV
W. J. Smith, SAIC, Las Vegas, NV
J. K. Statler, SAIC, Las Vegas, NV
M. L. Watt, SAIC/USGS, Denver, CO
D. D. Porter, USGS/SAIC, Golden, CO
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John G. Gandi, YMSCO, NV
M. A. Jones, YMSCO, NV
R. M. Nelson, Jr., YMSCO, NV
C. M. Newbury, YMSCO, NV
E. C. Rehkop, YMSCO, NV

3. Corrective Action to Prevent Recurrence:

Queried the Records Information System for Study Plan Record Packages submitted from 9/1/93 through 6/15/94 and identified a total of 20 Study Plan Record Packages submitted. Reviewed the following Study Plan (SPs) Record Packages and found that "Draft" was stamped on the draft SPs.

Study Plan 8.3.1.8.1.2, Revision 0 NNA.931004.0030
Study Plan 8.3.1.4.2.1, Revision 3 NNA.930909.0089
Study Plan 8.3.1.3.5.1, Revision 0 NNA.930917.0155
Study Plan 8.3.1.3.5.2, Revision 0 NNA.930917.0155
Study Plan 8.3.1.2.2.7, Revision 1 NNA.930928.0063
Study Plan 8.3.1.2.2.6, Revision 1 NNA.931014.0048
Study Plan 8.3.1.5.1.5, Revision 1 NNA.940519.0012
Study Plan 8.3.1.3.5.1, Revision 1 NNA.931216.0011
Study Plan 8.3.1.3.5.2, Revision 1 NNA.931216.0011


Amelia I. Arceo, 6/15/94

To verify Corrective Action to Prevent recurrence, which is the issuance and implementation of YAP 17.1Q, reviewed the Incoming and In-process Log sheet for off-site participants to identify the record/record packages that were submitted after 5/31/94, which is the effective date of YAP 17.1Q. The logs' Transmittal Date from 5/31/94 to 6/23/94, indicated 24 entries. The record/record packages that were reviewed were all created prior to the effective date (5/31/94) of YAP 17.1Q; hence, the implementation of the above procedure could not be verified.

The three transmittals that were reviewed are listed below:

Transmittal ID	Date Received	Trans'l Date	Participant	Comments
9406023	6/8/94	6/3/94	LLNL	13 Records/4 Packages
94-16	6/3/94	5/27/94	LANL	5 Records/2 Packages
9406004	6/2/94	6/1/94	LLNL	2 Records/8 Packages

A list of personnel required to maintain YAP-17.1Q was verified on 6/24/94. 97 of the 410 individuals on the computer-generated list (Training completed by Procedure) have not completed their training to YAP-17.1Q.

It is recommended that a follow-up surveillance be performed within three months to verify implementation of and completion of training to YAP 17.1Q.


Amelia I. Arceo, 6/24/94