



Department of Energy
Yucca Mountain Site Characterization
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WBS 1.2.11
QA: N/A

DEC 14 1993

Les E. Shephard
Technical Project Officer
for Yucca Mountain
Site Characterization Project
Sandia National Laboratories
P.O. Box 5800
Organization 6302
Albuquerque, NM 87185

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF CORRECTIVE ACTION REQUEST
(CAR) YM-93-098 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION
(YMQAD) AUDIT YMP-93-17 OF SANDIA NATIONAL LABORATORIES (SCP: N/A)

The YMQAD staff has verified the corrective action to CAR YM-93-098 and
determined the results to be satisfactory. As a result, the CAR is considered
closed.

If you have any questions, please contact either Robert B. Constable at (702)
794-7945 or Kenneth T. McFall at (702) 794-7280.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-1186

Enclosure:
CAR YM-93-098

cc w/encl:

K. R. Hooks, NRC, Washington, DC *
S. W. Zimmerman, NWPO, Carson City, NV
R. R. Richards, SNL, 6319, Albuquerque, NM
F. J. Schelling, SNL, 6352, Las Vegas, NV
J. H. Hines, OQD, AL

cc w/o encl:

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

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PDR WASTE
WM-11 PDR

ADD: Ken Hooks
Ltr. Encl.
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**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

8 CAR NO.: YM-93-098
DATE: 9-24-93
SHEET: 1 OF 2
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document QAIP 17.1, Revision 00		2 Related Report No. YMP-93-17	
3 Responsible Organization SNL		4 Discussed With D. Hawkinson	
5 Requirement: <p>Paragraph 3.0 states in part "QA Record: A completed document that furnishes evidence of the quality and completeness of items and activities affecting quality. A complete QA record is an original or reproduced copy of a document that will receive no more entries and whose revision would be subject to a change control process."</p> <p>Paragraph 4.2.5 states, "The record source shall submit the record to the Local Records Center (LRC) as soon as practical after record completion."</p> <p>QAIP 4-1, paragraph 5.0, states in part, "The QA records include: -Purchase Requisitions(PR)</p>			
6 Adverse Condition: <p>Several QA Records dealing with procurement activities have not been submitted to the LRC in a practical manner.</p> <p>EXAMPLES ARE:1) Contract No. AA-1535, Amendments 5, 6, 7, 8, 9. Plus Change Requisition No. 9 2) Contract NO AD-0766...Original Contract document. 3) Contract No AF-9294. Original Contract document. 4) Contract No AE-6737. Original Contract document. 5) Contract No AE-6736. Original Contract document. 6) Contract No Ag-4079. Original Contract document. 7) Contract 78-6653. Change Requisition No. 4 and Change Amendment No. 5 8) Contract AB-1106. Change Amendment No 5</p> <p>The majority of these contracts have PRs dated over 6 months to the date of this audit.</p>			
9 Does a significant condition adverse to quality exist? Yes <u> </u> No <u>X</u> If Yes, Circle One: A 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			
12 Required Actions: <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Extent of Deficiency <input checked="" type="checkbox"/> Preclude Recurrence <input checked="" type="checkbox"/> Root Cause Determination			
13 Recommended Actions: 1) Modify the QA Records procedure to include a quantitative criteria to ensure that QA records are submitted to the LRC within a timely manner. 2) Provide a documented evidence of training provided to individuals responsible for submittal of contract documents to the LRC.			
7 Initiator M. R. Diaz <i>Mario Diaz</i> Date <u>9-24-93</u>		14 Issuance Approved by: QADD <i>RC Spence</i> Date <u>9/28/93</u>	
15 Response Accepted QAR <i>Kenneth McFall</i> Date <u>11/15/93</u>		16 Response Accepted QADD <i>RC Spence</i> Date <u>11/18/93</u>	
17 Amended Response Accepted QAR Date <u> </u>		18 Amended Response Accepted QADD Date <u> </u>	
19 Corrective Actions Verified QAR <i>Kenneth McFall</i> Date <u>12/9/93</u>		20 Closure Approved by: QADD <i>RC Spence</i> Date <u>12/14/93</u>	

ENCLOSURE

REV. 08/91

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CORRECTIVE ACTION REQUEST (Continuation Page)

5 Requirements (continued)

- Contracts
- Change Requisitions(CR)
- Change Amendments to Contracts

13 Recommended Action(s) (continued)

This training should be reflecting the modification requested in 13-1 above.

- 3) Investigate to determine if there are similar deficiencies.
- 4) Determine root cause.
- 5) Indicate what kind of corrective action is going to be taken to preclude recurrence.

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CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE

CORRECTIVE ACTION FOR DEFICIENT CONDITION

A. Extent of Deficiency

The section of the SNL YMP LRC which contains procurement records will be screened to determine if any other procurement documents which must be treated as QA Records have not been submitted as required. If any additional deficiencies are found, they will be documented on an SNL CAR.

B. Root Cause Determination

Investigation indicates that, for some of the contracts cited above, the situation is the same as described in the response to Corrective Action Request YMP 93-096, that is, that the QA Grading Report that was in effect at the time the subject records were generated, did not require QA elements 4 and 7 to be applied to the work. For those cases, the response to CAR YMP 93-096 is also applicable.

Investigation shows that there are other root causes for those cases cited above where the procurement documents clearly should have been submitted to the LRC in a more timely manner.

- The procedure governing submittal of procurement documents as QA Records that was in place at the time of the audit and before places the responsibility to do so on the "SNL Delegated Representatives." These are the SNL staff members who are responsible for the various contracts, a large and diverse set of people. Whenever any action is the responsibility of a large number of people, the likelihood of inconsistency and deficiencies in performance is great.
- For the procurement documents cited above, investigation shows that this is not an issue of the clarity, or lack thereof, in the time constraints stated in QAIP 17-1 for submittal of QA Records. The personnel involved were not simply "slow" in submitting procurements records because the procedure does not state a quantitative deadline for records submittal; they were unaware that the cited records needed to be submitted at all.
- The level of understanding of procedural requirements concerning procurement and records, and the attention-to-detail in meeting those requirements, varies widely among the SNL Delegated Representatives.

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C. Remedial Action:

The following procurement QA Records will be processed and transmitted to the SNL YMP Local Records Center (LRC) in accordance with QAIP 17-1.

(A) Contract AA-1535 and Amendments 5, 6, 7, 8 & 9	(GRAM, Inc.)
(B) Contract AD-0766, Original Issue	(UNM)
(C) Contract AF-9294, Original Issue	(Oregon St.U.)
(D) Contract AE-6737, Original Issue	(Agapito)
(E) Contract AE-6736, Original Issue	(ITC)
(F) Contract AG-4079, Original Issue	(R.T. Bieniawski)
(G) Contract 78-6653, and Amendments 4 & 5	(RE/SPEC)
(H) Contract AB-1106, and Amendment 5	(UNM)

D. Actions to Preclude Recurrence

In order to address the root causes cited above, the following actions will be taken:

A sole individual will be identified to receive all SNL YMP procurement documents that are issued by SNL Purchasing (e.g., contracts and change amendments). That individual's job functions will include authenticating those records and submitting them to the SNL LRC within the time constraints established by QAIP 17-1. A training assignment will be established for this individual as to QAIP 17-1, specifically, authentication, submittal preparation, and time frames.

E. Corrective Action Completion Dates

Action A will be completed by 11/30/93
Action C will be completed by 11/12/93
Action D will be completed by 12/15/93

Response Approved: _____

for TPO, SNL YMP

Date

Oct 28, 1993

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VERIFICATION OF CORRECTIVE ACTION FOR CAR YM-93-098

R. Richards sent a package of documentation concerning this CAR to YMQAD which was received on 12/9/93. This documentation contained sufficient information to verify completion of corrective action and close the CAR. The documentation included the following:

1. Copies of the procurement records screening results and the SNL CAR that was generated.
2. Copies of the contracts and amendments that were authenticated and transferred to the SNL YMP Local Records Center complete the SNL LRC stamp with initials and dates. All required documents were present.
3. Copies of the assignment of responsibility for SNL YMP procurement documents and the completed training assignment sheets for the affected employees.

This CAR is now considered closed.

Kenneth A. McFall
Signature

Date 12/9/93