

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
QUALITY ASSURANCE PROGRAM
QUARTERLY TREND REPORT
COVERING THE PERIOD OCTOBER 1992 - SEPTEMBER 1993

Approved:



Donald G. Horton, Director
Office of Quality Assurance

Date: 10/15/93

EXECUTIVE SUMMARY

1.0 Introduction

Quality Assurance Administrative Procedure (QAAP) 2.9, *Quality Assurance Program Trend Evaluation and Reporting*, Revision 3, requires that each of the OCRWM Quality Assurance Divisions evaluate, at quarterly intervals, all Corrective Action Requests (CARs) issued within the last twelve months that identified significant conditions adverse to quality. The purpose of this evaluation is to determine if any adverse trends or generic adverse trends are evident in the OCRWM QA Program and to take prompt corrective action where such trends exist.

This report covers the period from October 1, 1992 through September 30, 1993 and evaluates all CARs that reported Significant Conditions Adverse to Quality. This evaluation incorporates new data from CARs issued during the quarter July 1993 - September 1993.

Section 1 reports the results of the Headquarters Quality Assurance Division (HQAD) trend evaluation. Section 2 reports the results of the Yucca Mountain Site Characterization Project Quality Assurance Division (YMQAD) trend evaluation. Each section provides the status of previously reported adverse trends and identified current adverse or generic trends. Each section also contains details on problems constituting current adverse or generic adverse trends, discusses causes and actions to correct these trends, and includes a table of CARs that were evaluated.

2.0 Summary

A total of Thirty Five (35) CARs were evaluated during the reporting period. The HQAD evaluated Seventeen (17) CARs and the YMQAD evaluated Eighteen (18) CARs. No adverse trend was evident during the combined evaluation of the HQAD and YMQAD quarterly trend reports.

Headquarters had no new CARs to evaluate for this quarter. YMQAD had eight CARs which were generated during this quarter. One CAR (YM-93-055) was issued where supplier evaluation and testing had not been performed for items purchased from suppliers of commercial grade materials to be used in quality affecting work. Two CARs (YM-93-062 and YM-93-064) related to problems with specifications being unclear and allowing deficiencies to be corrected without an approved NCR being generated. One CAR (YM-93-063) related to

Nonconformance Reports (NCRs) being dispositioned "Use As Is" without technical justification. Two CARs (YM-93-072 and YM-93-073) were written to describe problems with drawings, such as not including list of all applicable design inputs and TBV identifier omitted from some drawings. One CAR (YM-93-086) documented that quality affecting work was being performed prior to the issuance of a technical directive and interagency agreements are not being processed per approved procedures. CAR YM-93-070 was not included in this evaluation since it was generated as a result of an adverse trend identified in the previous quarter. None of these CARs appear to constitute an adverse trend or generic adverse trend.

No other adverse or generic adverse trends were noted as a result of this evaluation.

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
HEADQUARTERS QUALITY ASSURANCE DIVISION
QUARTERLY TRENDS REPORT
COVERING THE PERIOD OCTOBER 1992 - SEPTEMBER 1993

Approved

R. W. Clark

Robert W. Clark, Director
Headquarters Quality Assurance Division

Date

10/7/93

**HEADQUARTERS QUALITY ASSURANCE DIVISION
QUARTERLY TRENDS REPORT
COVERING THE PERIOD OCTOBER 1992 - SEPTEMBER 1993**

1.0 Status of Previously Reported Trends

There are no previously reported trends.

2.0 Current Adverse and Generic Adverse Trends

No adverse or generic adverse trends were evident from an evaluation of seventeen (17) Headquarters Corrective Action Requests (CARs), issued during the last twelve months, that identified significant conditions adverse to quality.

As previously reported, two CARs were issued, HQ-92-026 to EIA, and HQ-93-019 to M&O/TRW, identifying the lack of verification of experience for quality-affecting personnel. However, this is not a trend because several deficiencies, identified against EIA, cumulatively indicate a lack of an effective quality assurance program. CARs were issued separately for each of the identified conditions as matter of convenience so that each of them could be addressed independently.

Two CARs were issued CAR HQ-92-017 to RW-20, RW-30, and RW-40, and CAR HQ-93-023 to PNL, identifying records inadequacies. This is not a trend because CAR HQ-92-017 deals with the improper transmittal of records packages to the Quality Records Center and HQ-93-023 deals with the improper storage of records.

See Table 1-1, Significant Condition Data Base for HQ Trend Evaluation, for a list of CARs evaluated.

3.0 Problems Constituting Current Adverse Trends or Generic Adverse Trends

Since there are no current adverse or generic adverse trends at Headquarters, no problems constituting trends are evident.

4.0 Summaries of Identified Causes and Actions Required to Correct Current Adverse Trends or Generic Adverse Trends

Not applicable.

TABLE 1-1: SIGNIFICANT CONDITION DATA BASE FOR HQ TREND EVALUATION

CAR Number	CAR Issue Date	Resp. Org.	Adverse Condition
HQ-92-017	10/13/92	RW-20 RW-30 RW-40	Inadequate management of QA records by records originators.
HQ-92-020	10/21/92	EIA	No QA program implementing procedures issued.
HQ-92-022	10/21/92	EIA	No SQAP. Inadequate QA program controls on RW-859 Data Collection System process.
HQ-92-023	10/21/92	EIA	No SQAP. Inadequate QA program controls on International Nuclear Model (INM).
HQ-92-025	10/21/92	EIA	Inadequate training program.
HQ-92-026	10/21/92	EIA	No position descriptions established. No verification of minimum education and experience.
HQ-93-006	01/28/93	RW-3.2	Inadequate evaluation of CAR responses, no root cause required for SCATQ.
HQ-93-009	02/16/93	EM-343	Ineffective technical review process.
HQ-93-010	02/16/93	EM-343	Technical activities not verified during audits/surveillances.
HQ-93-011	02/16/93	EM-343	List of items & activities subject to QARD not developed.
HQ-93-013	03/18/93	M&O	Procedures lack adequate acceptance criteria.
HQ-93-015	03/18/93	M&O	Audit deficiencies not reported on CARs.
HQ-93-018	03/18/93	M&O	Deficiencies in preparation & review of procedures.
HQ-93-019	03/18/93	M&O	Inadequate verification of education.
HQ-93-021	03/18/93	M&O	Audit reports lack effectiveness statements & summary of objective evidence.

TABLE 1-1: SIGNIFICANT CONDITION DATA BASE FOR HQ TREND EVALUATION
(Continued)

CAR Number	CAR Issue Date	Resp. Org.	Adverse Condition
HQ-93-022	05/17/93	PNL	Inadequate use of technical procedures; use of unapproved procedure.
HQ-93-023	05/17/93	PNL	Records maintained in individual files for longer than 90 days.

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

QUALITY ASSURANCE PROGRAM TREND REPORT

FOR

OCTOBER 1992 THROUGH SEPTEMBER 1993

SECTION 2

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT

Approved



Richard E. Spence, Director
Yucca Mountain Site Characterization
Quality Assurance Division

Date

10/5/93

SECTION 2

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT

1.0 STATUS OF PREVIOUSLY REPORTED TRENDS

There is one unresolved adverse quality trend which was reported last quarter and is being carried forward into the quarter July-September 1993. The adverse trend from last quarter is documented on CAR YM-93-070 and has been included in this report.

2.0 CURRENT ADVERSE AND GENERIC ADVERSE TRENDS

Eighteen CARs issued by the Yucca Mountain Quality Assurance Division (YMQAD) during the past twelve months identified conditions significantly adverse to quality. No adverse or generic adverse trends were identified during the evaluation of those CARs.

It should be noted that CARs YM-93-037, YM-93-040, and YM-93-070 were excluded from evaluation since they were the subject of an adverse trend identified in last quarters report.

See Table 2-1, Significant Condition Data Base for Trend Evaluation, for a list of CARs evaluated.

3.0 PROBLEMS CONSTITUTING CURRENT ADVERSE TRENDS OR GENERIC ADVERSE TRENDS

In the absence of current or generic adverse trends, no such problems exist.

4.0 SUMMARIES OF IDENTIFIED CAUSES AND ACTIONS REQUIRED TO CORRECT CURRENT ADVERSE TRENDS OR GENERIC ADVERSE TRENDS

Not applicable.

TABLE 2-1: SIGNIFICANT CONDITION DATA BASE FOR YMP TREND EVALUATION

CAR Number	CAR Issue Date	Response Org.	Adverse Condition
YM-93-004	10/92	YMP	Quality Assurance record packages were still being submitted to the records center with some of the records partially or wholly illegible; in the auditors judgement, the "best available copy" provision of the records procedure was being abused by all records sources.
YM-93-020	12/92	YMP	Some quality-affecting activities were performed without documentation of training in the governing procedures. This deficiency existed in several Project Office areas, and the use of "real time" training was not clearly evident.
YM-93-027	12/92	YMP	No procedures have been developed to implement the TFM Plan, no TFM lists have been prepared, and no final analysis of TFMs have been utilized.
YM-93-032	02/93	RSN	Requirements of RSN Grading Report No. RSN-GR-032 are not being met as follows: Position Quals/Job Descriptions, Management Assessments of Survey Dept., M&TE for survey work not controlled, discrepancies not documented per QA Program, no audits and surveillances f field survey, and lack of software controls.

CAR Number	CAR Issue Date	Response. Org.	Adverse Condition
YM-93-033	02/93	REECO	Calibrations not performed in accordance with procedures and procedures were not revised and/or new ones generated when it was found that personnel could not work to existing requirements.
YM-93-035	03/93	YMPO	FCRs are not being completed in accordance with AP 3.5Q.
YM-93-036	03/93	M&O	The CRWMS M&O have not been implementing the requirements of QAP 5-1 for the control and review of procedures.
YM-93-037	03/93	M&O	CRWMS M&O Implementing Line Procedures do not meet some of the requirements of the QAPD and in some instances do not reflect current practices. ILP NSP-17-1 does not address requirements from QAPD for controlling documents and records. ILP NSP-6-1 is not consistent with current practices.
YM-93-040	04/93	M&O	Procedures do not provide criteria for determining the method of design verification.
YM-93-045	04/93	M&O	No evidence provided to reflect that the CRF storage facility has been evaluated to store "one-of-a-kind" records/items.
YM-93-055	07/93	REECO	Supplier evaluation and testing was not performed for items purchased from suppliers of commercial-grade materials which will be used in work important to radiological safety and waste isolation.

CAR Number	CAR Issue Date	Response. Org.	Adverse Condition
YM-93-062	07/93	M&O	Specification YMP-025-1-SP09 and Item Specification 02165, 02310, and 03361 unclear on definition of commercial grade for quality affecting procurements. Specifications do not address traceability. FCR removed traceability requirements.
YM-93-063	07/93	M&O	NCRs dispositioned "Use As Is" and closed without any technical justification. NCRs dispositioned "Use As Is" based on documentation from unqualified suppliers.
YM-93-064	07/93	M&O	A specification allows a deficiency to be corrected without the issuance of an NCR.
YM-93-070	07/93	M&O	Repetitive deficiency regarding implementing procedures not addressing upper tier requirements and implementing procedures inadequate or non-existent for quality affecting activities. (Generated as a result of an Adverse Trend from previous quarterly evaluation)
YM-93-072	07/93	M&O	TBV identifier omitted from drawings when revised.
YM-93-073	07/93	M&O	Drawings associated with Change Directive 93/405 do not list all applicable quality affecting design inputs.
YM-93-086	08/93	YMP	Quality affecting work being assigned prior to the issuance of a Technical Directive. QMP-04-02 not being implemented for processing interagency agreements.