



**DEPARTMENT OF ENERGY**  
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Office of Geologic Disposal  
Yucca Mountain Site Characterization Project Office  
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WBS 1.2.11  
QA: N/A

MAR 2 1994

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ISSUANCE OF SURVEILLANCE RECORD YMP-SR-94-021 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) SURVEILLANCE OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT AND OPERATING CONTRACTOR (CRWMS M&O) AUDIT 94-VIA-02 (SCP: N/A)

Enclosed is the record of Surveillance YMP-SR-94-021 conducted by the YMQAD at the CRWMS M&O facilities in Vienna, Virginia, from January 17 through 21, 1994.

The purpose of the surveillance was to verify that CRWMS M&O performed Audit 94-VIA-02 in accordance with CRWMS M&O Quality Assurance Procedure 18.2, Revision 2, "Audits," and to verify that the adequacy and implementation of the audit process meets the requirements of the Quality Assurance Requirements and Description Document, DOE/RW-0333P, Revision 0.

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 Daniel A. Klimas at 794-7696.

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-2116

Enclosure:  
Surveillance Record YMP-SR-94-021

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ADD: Ken Hooks

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

QUALITY ASSURANCE SURVEILLANCE RECORD

SURVEILLANCE DATA

<sup>1</sup>ORGANIZATION/LOCATION:  
TRW (M&O) Vienna, VA

<sup>2</sup>SUBJECT:  
M&O Audit Process

<sup>3</sup>DATE: 1/17-21/94

<sup>4</sup>SURVEILLANCE OBJECTIVE:  
Verify M&O performance of internal audit in accordance with applicable requirements.

<sup>5</sup>SURVEILLANCE SCOPE:  
To assess the adequacy and implementation of the M&O Audit Process.

<sup>6</sup>SURVEILLANCE TEAM:  
Team Leader:  
Dan Klimas  
Additional Team Members:  
Dennis Threatt

<sup>7</sup>PREPARED BY:  
Dan Klimas  
Surveillance Team Leader

1/12/94  
Date

<sup>8</sup>CONCURRENCE:  
RC James  
QA Division Director

1/13/94  
Date

SURVEILLANCE RESULTS

<sup>9</sup>BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:

See Pages 2, 3, and 4

<sup>10</sup>SURVEILLANCE CONCLUSIONS:

See page 5

<sup>11</sup>COMPLETED BY:  
Daniel Klimas  
Surveillance Team Leader

2/11/94  
Date

<sup>12</sup>APPROVED BY:  
RC James  
QA Division Director

2/25/94  
Date

**9 BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:**

The purpose of this surveillance was to observe the Civilian Radioactive Waste Management System (CRWMS) Management and Operating (M&O) Contractor's Audit No. 94-VIA-02 conducted in Vienna, Virginia from January 17 through 21, 1994.

The scope of the audit planned to evaluate the adequacy and effectiveness of implementation of selected elements of the M&O Quality Assurance (QA) Program. The following criteria were identified in the scope of this audit: Procurement Document Control; Plans, Procedures and Drawings; Document Control; Control of Purchased Items and Services; and Corrective Action.

The following personnel participated in the audit:

- W. Farmer, Audit Team Leader, M&O
- P. Chomentowski, Auditor, M&O
- G. Keener, Auditor, M&O
- D. Jennings, Auditor, M&O
- D. Threatt, Observer, Headquarters Quality Assurance Division/  
Quality Assurance Technical Support Services (QATSS)
- D. Klimas, Observer, Yucca Mountain Quality Assurance Division/QATSS

The Office of Civilian Radioactive Waste Management (OCRWM) surveillance team considers that the audit was ineffective in determining the adequacy and effectiveness of implementation of the M&O QA Program in the area of Procurement Document Control which was determined to be marginally effective by the audit team.

The audit was disrupted by inclement weather which caused cancellations, delays, and unavailability of certain personnel required to be contacted during the audit. Additionally, weaknesses were observed in the use of audit checklists and in the review of objective evidence to determine compliance with procedural requirements. As a result, the M&O performed a surveillance, 94-VIS-02 during the week of January 31, 1994 to address concerns identified by the OCRWM surveillance team which identified deficiencies in the procurement process (reference M&O CAR 94-QV-C-012).

The surveillance team reviewed the qualification and training records to determine that the audit team had been qualified to perform the audit. Although it was determined that the audit team was qualified, a previous OCRWM surveillance HQ-SR-94-02 identified that one member of the audit team records were inadequate to support certification as a Lead Auditor (reference OCRWM Verification Report for CAR HQ-93-013).

**' BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS (Continuation):**

The audit team identified six deficiencies as a result of the audit. The following represents the CARs issued during the audit and the CAR issued as a result of the follow-up surveillance in the area of procurement.

**M&O CAR 94-QV-C-007**

The M&O procedures require a Document Identifier (DI) on documents to be controlled and also require that the Document Control Center (DCC) staff review the document to ensure that it contains the required information. Contrary to these requirements, the Technical Document Preparation Plan (TDPP) for the CRWMS Interface Specification and the TDPP for Systems Requirements Documents were submitted to the DCC by the originator without the required DI and were not returned to the originator by the DCC.

**M&O CAR 94-QV-C-008**

For CARs not classified as "Significant," Quality Assurance Procedure (QAP)-16-1 requires that the interfacing manager(s) investigate the reported condition, document the results of the investigation, and propose a remedial action. Contrary to this requirement, several M&O CARs did not contain the interfacing manager's investigation of the reported condition.

**M&O CAR 94-QV-C-009**

The Quality Assurance Requirements and Description (QARD) requires that the content of implementing documents shall contain a sequential description of work to be performed. The M&O procedure for preparation of procedures states that the process steps are to be "preferably sequential, if appropriate."

**M&O CAR 94-QV-C-010**

The QARD requires that the content of implementing documents contain the identification of lifetime and nonpermanent QA Records generated by the implementing document. The M&O procedure for preparation of procedures does not contain this requirement.

**M&O CAR 94-QV-C-011**

The M&O QAP-3-13 requires DIs for documents with certain type codes. Several documents reviewed did not contain the required DIs.

**9 BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS (Continuation):**

**M&O CAR 94-QV-C-015**

The M&O QAP-7-1 requires that a designated Plan Preparer prepare and document a plan for the procurement process of quality-affecting procurements. A Purchase Requisition (PR) (HD 3153) was submitted to the QE manager for signature without an approved procurement plan.

The following deficiency was identified as a result of the follow-up surveillance performed in the area of procurement based upon the OCRWM surveillance team's concerns:

**M&O CAR 94-QV-C-012**

The QA requirements associated with the transition of the work of Sandia National Laboratories (SNL) to the M&O were not fully implemented. Approval of SNL's QA Plan by the M&O was documented but the basis for approval was not documented. Deficiencies identified by the program evaluation of SNL were not documented as required by M&O procedures. M&O procedures do not effectively address the procurement transition process; therefore, procedural actions required in the approval of suppliers were not performed.

The following represents deficiencies corrected during the audit:

1. A PR/Statement of Work for HVAC modification of the Central Records Facility records vault was not reviewed by the QA Organization. The PR/Statement of Work was subsequently sent to QA for review and was determined to be non-quality affecting.
2. No records existed to show that two Procurement Department personnel had been trained in the latest revision of QAP-4-1 and QAP-7-1. Further investigation found that the I&T Matrices were in the possession of the affected individuals and had not been placed in the training files.
3. No action had been taken on CAR 94-QV-C-086 since issuance on August 31, 1993. Timeliness of the CAR process was previously identified by CARs 94-QN-C-010 and 94-QV-C-003. This deficiency will be addressed with closure of these CARs.

**10 SURVEILLANCE CONCLUSIONS:**

The OCRWM surveillance team considers that the audit was ineffective in determining the adequacy and effectiveness of implementation of the M&O QA Program in the area of Procurement Document Control which was determined to be marginally effective by the audit team.

The inclement weather contributed to the ineffectiveness of the audit in this area as evidenced by the surveillance conducted after the audit to further evaluate the area of procurement in which deficiencies were discovered.

It is recommended that the M&O audit checklists be developed in order to more thoroughly evaluate the process being audited and to ensure a more indepth examination of objective evidence. Also, the M&O audit personnel should be instructed to pursue a more indepth examination of objective evidence to evaluate QA program effectiveness.

Additionally, the effectiveness of corrective action and the trending process should be further examined as recurring deficiencies are being identified in many areas, specifically in the areas of procurement and training as documented in this audit and the M&O audit 93-VIA-01 conducted in Vienna, Virginia in September 1993.