



DEPARTMENT OF ENERGY
Office of Civilian Radioactive Waste Management
Office of Geologic Disposal
Yucca Mountain Site Characterization Project Office
P.O. Box 98608
Las Vegas, NV 89193-8608

WBS 1.2.11
QA: N/A

MAR 9 1994

L. Dale Foust
Technical Project Officer
for Yucca Mountain
Site Characterization Project
TRW Environmental Safety Systems, Inc.
Bank of America Center, Suite P-110
101 Convention Center Drive
Las Vegas, NV 89109

ISSUANCE OF SURVEILLANCE RECORD YMP-SR-94-034 RESULTING FROM YUCCA MOUNTAIN
QUALITY ASSURANCE DIVISION (YMQAD) SURVEILLANCE OF THE CIVILIAN RADIOACTIVE
WASTE MANAGEMENT SYSTEM MANAGEMENT AND OPERATING CONTRACTOR (CRWMS M&O)
(SCP: N/A)

Enclosed is the Record of Surveillance YMP-SR-94-034 conducted by the YMQAD at
the CRWMS M&O facilities at the Yucca Mountain, Nevada, site on February 24,
1994.

The purpose of the surveillance was to verify compliance with the requirements
of Administrative Procedure 3.5Q, Revision 3, and Interim Change Notice 1,
Field Change Control Process, concerning the processing of expedited and
urgent Field Change Requests.

One Corrective Action Request (CAR) was issued as a result of this
surveillance. Response to the CAR, which was transmitted via separate letter,
is due by the date indicated in Block 11 of the CAR.

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. However, the open CAR will continue to be
tracked until it is closed to the satisfaction of the Quality Assurance
representative and the Director, YMQAD.

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

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-2267

Enclosure:
Surveillance Record YMP-SR-94-034

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PDR. WASTE
WM-11 PDR

ADD: Ken Hooks
Ltr. Encl.
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WM-11
NH03

MAR 9 1994

L. Dale Foust

-2-

cc w/encl:

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

QUALITY ASSURANCE SURVEILLANCE RECORD

SURVEILLANCE DATA

¹ORGANIZATION/LOCATION:
CRWMS Management and
Operating Contractor (M&O), Las
Vegas, Nevada

²SUBJECT:
Expedited FCRs

³DATE: 2/24/94

⁴SURVEILLANCE OBJECTIVE:
Monitor follow-up of expedited Field Change Requests (FCRs).

⁵SURVEILLANCE SCOPE:
Sample Expedited FCRs and urgent FCRs to verify processing within the required 5-day limit.

⁶SURVEILLANCE TEAM:
Team Leader:

K. T. McFall
Additional Team Members:

J. F. Pelletier

⁷PREPARED BY:

Kenneth McFall
Surveillance Team Leader

2/18/94
Date

⁸CONCURRENCE:

QA Division Director

2/18/94
Date

SURVEILLANCE RESULTS

⁹BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:

See Page 2.

¹⁰SURVEILLANCE CONCLUSIONS:

See Pages 2 and 3.

¹¹COMPLETED BY:

Kenneth McFall
Surveillance Team Leader

3/1/94
Date

¹²APPROVED BY:

QA Division Director

3/8/94
Date

Quality Assurance Surveillance Record Continuation Sheet

⁹ BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:

On February 24, 1994, a surveillance of the M&O contractor's expedited and urgent FCR process was conducted at the Field Change Control Board (FCCB) offices at the Yucca Mountain Site. The surveillance included a review of all the expedited and urgent FCRs processed since the latest revision of Administrative Procedure (AP)-3.5Q was issued (December 17, 1993). As a result of the surveillance, one Corrective Action Request (CAR) was issued concerning the inability of the FCCB to meet the five-day processing time requirement for expedited and urgent FCRs imposed by AP-3.5Q.

¹⁰ SURVEILLANCE CONCLUSIONS:

A total of 13 expedited and urgent FCRs were examined for compliance with AP-3.5Q requirements. It was found that the procedure was vague in its instructions concerning these FCRs and the time frame imposed was very frequently impossible to comply with. There was also confusion on the part of the personnel processing the FCRs as to which date of the several dates listed on the form actually started the five day clock. The overall implementation of AP-3.5Q is considered adequate, but in addition to the CAR mentioned above, several recommendations should be considered for improving the system. A listing of the CAR and the recommendations is as follows:

Corrective Action Requests:

1. CAR YM-94-021, AP-3.5Q, Revision 3, Paragraphs 6.2.1 and 6.2.2 state that an expedited or urgent FCR must be processed within five days of interim approval. Contrary to this requirement, several expedited FCRs went over the allowable time limit.

Recommendations:

1. Either streamline the process for handling expedited and urgent FCRs or make the timeframe allowed for handling more realistic.
2. Include the originator of the FCR on the distribution list of the disposition not just the originating organization. The originator frequently does not receive notice of the FCR's disposition until a significant amount of time (if ever) has elapsed. Additionally, the affected Participant Quality Control organization should be included in the distribution.
3. Clarify or at least include a definition of "hold," and explain the difference between "hold" and "extension."

4. A provision for labeling FCRs and any associated sketches as controlled documents should be included since they actually supersede prior editions.
5. Effort should be undertaken to limit the use of expedited FCRs by organizations other than those for whom the procedure was designed. While there is no requirement prohibiting this practice, it is an abuse of the system that was put into place to handle emergency field changes that are needed to keep work moving. There is a system in place to handle other types of change requests, and that system should be followed.