

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

⁶ CAR NO. YM-94-056
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CORRECTIVE ACTION REQUEST

¹ Controlling Document M&O QAP-5-2, Rev 0, P01, Preparation of M&O Implementing Line Procedures ² Related Report No. HQ-94-02

³ Responsible Organization CRWMS M&O ⁴ Discussed With R. Ruth, C. Bartley

⁵ Requirement:

Section 2. SCOPE, states that the procedure is applicable to the preparation and maintenance of ILPs used to perform work subject to QARD requirements.

⁶ Adverse Condition:
Several deficiencies associated with the preparation of Implementing Line Procedures indicates that the ILPs were not prepared in accordance with QAP-5-2. Examples include:

History of Changes forms were not completed for NLP-3-10, R1, NLP-3-16, R0, P03, and NLP-17-5, R1 (examples).

Change Histories reviewed were not listed for MGP-3-8, R0, P03, and NLP-17-4, R0, P02 (examples).

ILP Review Records for NLP-3-17, R1 were missing information.

Nonmandatory comments were submitted with IRRs for NLP-3-10, R1, NLP-3-20, R0, and NLP-17-5, R0.

NLP-17-5, R1 has responses to comments made by someone other than the procedure author.

Several ILP Record Packages did not contain the required review drafts.

⁹ Does a significant condition adverse to quality exist? Yes x No
If Yes, Circle One: A (B) C D E ¹⁰ Does a stop work condition exist? Yes No x; If Yes - Attach copy of SWO
If Yes, Circle One: A B C ¹³ Response Due Date: 20 working days from issuance

¹¹ Required Actions: Remedial Extent of Deficiency Preclude Recurrence Root Cause Determination

¹² Recommended Actions:

Evaluate the adequacy of implementation of the QAP-5-2 preparation process.

⁷ Initiator: CC. Loran for
Dennis Threatt Date 6-24-94 ¹⁴ Issuance Approved by: AC Loran Date 7/12/94
QADD

¹⁵ Response Accepted: James T. Schmit Date 8/24/94 ¹⁶ Response Accepted: [Signature] Date 8-26-94
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¹⁷ Amended Response Accepted: Date ¹⁸ Amended Response Accepted: Date
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¹⁹ Corrective Actions Verified: Date ²⁰ Closure Approved by: Date
QAR QADD

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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

1. Corrective Action Response

A. Remedial Action-All records packages for Implementing Line Procedures (ILP) which were generated in accordance with QAP-5-2, Revision 0 will be reviewed to verify that they contain the required records and that the records are properly completed. Any discrepancies identified will be corrected, if possible, and for those which can not be corrected an explanation describing the circumstances will be included as a supplement to the records package.

B. Extent of Deficiency-Enough records packages have been reviewed during the audit to determine that the types of problems identified may be found(to some degree) in most of the records packages for ILPs.

C. Root Cause Determination-Evaluation of the implementation of QAP-5-2 ILP preparation process has determined Human factors, personnel not paying attention to details and following approved procedures has been determined as the root cause. Record packages were developed, authenticated, and submitted to the Local Records Center with incomplete information, using out-of-date forms, missing information, and procedure process steps not being followed in detail. Record Packages for procedures in Vienna and Las Vegas were reviewed during the audit and all record packages in accordance with QAP-5-2, Revision 0 will be reviewed as part of the Remedial Action. Record Packages for Charlotte were not reviewed during the audit but will be included as part of the Remedial Action. Discrepancies were created in the record packages by the record sources who in this case are the procedure authors. Record Sources not paying attention to details, not following procedure steps and process requirements, and not reviewing procedures before completing record packages to ensure all requirements for development of the record packages were completed are the reasons for the discrepancies in the record packages.

D. Corrective Action to Preclude Recurrence-

a) Supervisors/Responsible Managers must ensure that no work is started until the necessary training is completed and recorded. Individuals who are assigned to be authors by Supervisors/Responsible Managers are required to meet M&O training requirements per the QA program. This includes each time there is a revision to QAP-5-2 the authors are required to meet the training requirements before performing work to QAP-5-2. This is done to maintain authors qualifications. M&O procedure QAP-2-1, Section 5.3.2 requires training on the latest procedure revision prior to performing work.

b) QAP-5-2, Revision 1 has been approved and was effective 8/1/94. All ILP authors (who are the records sources) will be identified to attend classroom training on QAP-5-2, Revision 1. This training will address the changes in QAP-5-2, what records are required for record packages, and the need to follow details and requirements in developing record packages. This will be complete by 10/1/94 and documented per QAP-2-1. Any personnel identified as an author on the ILP cover sheet (ILPs already approved and issued) but no longer has that responsibility will not be included in the training.

c) All ILP authors will be required to read QAP-17-1 RECORD SOURCE RESPONSIBILITIES FOR QA RECORDS and document it on the reading/self-study form per QAP-2-1. This will be completed by 10/1/94. The M&O QA program requires newly hired personnel who will be performing work under the M&O QA program to attend M&O training indoctrination which includes training for QAP-17-1. M&O procedure QAP-2-1, Section 5.2.3 requires indoctrination classroom training for QAP-17-1.

2. Action for 1A above (review of the records packages) will be completed by Charles F. Bartley (Las Vegas) and Michael J. Donovan (Vienna & Charlotte) with a completion date of 11/01/94. Corrections of discrepancies (when possible) will be performed by records sources and verified by Quality Assurance, to be completed by 11/01/94.

Action 1D.b and 1D.c above will be completed by Charles F. Bartley and M&O training department with a completion date of 10/01/94.

3. Responsible Manager: 

Date: 8-10-94