



Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
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QA: L

AUG 24 1994

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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

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR)
YM-94-070 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE
DIVISION (YMQAD) AUDIT YMP-94-01 OF CIVILIAN RADIOACTIVE WASTE
MANAGEMENT SYSTEM MANAGEMENT AND OPERATING CONTRACTOR
(SCPB: N/A)

The YMQAD staff has evaluated the response to CAR YM-94-070. The response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this date must be requested in writing, with appropriate justification, prior to the date. Please send a copy of extension requests to Deborah Sult, YMQAD/QATSS, 101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Kenneth O. Gilkerson at 794-7738.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-4794

Enclosure:
CAR YM-94-070

cc w/encl:
T. A. Wood, HQ (RW-14) FORS
~~R. L. Johnson~~, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
R. L. Robertson, M&O/TRW, Vienna, VA
Richard Jiu, M&O/TRW, Las Vegas, NV
R. P. Ruth, M&O/Duke, Las Vegas, NV

cc w/o encl:
W. L. Belke, NRC, Las Vegas, NV
D. G. Sult, YMQAD/QATSS, Las Vegas, NV

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

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CORRECTIVE ACTION REQUEST

1 Controlling Document OCRWM QARD DOE/RW-0333P, Revision 01	2 Related Report No. YMP-94-01
3 Responsible Organization M&O	4 Discussed With Jim Houseworth

5 Requirement:
QARD, Section 2.1 establishes requirements for planning, implementing and maintaining the Quality Assurance Program.

2.2.2.B states: "Affected organizations shall establish quality assurance implementing documents applicable to their scope of work that translates QARD requirements into work processes."

6 Adverse Condition:
Contrary to the above requirements, M&O procedure NLP-3-17, Revision 01, "Development of Waste Isolation Fluctuations" does not implement the QARD Supplement III, Section 2.3 as written. This procedure allows the use of unqualified data and computer codes without being identified and tracked.

NOTE: Procedure NLP-3-17 has been in effect since October of 1993. This CAR supplements CAR YM-94-015 but does not replace it.

Discussion:

The corrective action to CAR YM-94-015 addressed revising the OCRWM QARD to address issues relative to data used in WIEs for which no validation will be performed and subsequently revise project procedures. NLP-3-17 was revised in anticipation of QARD changes which never occurred and conflicts with the current QARD requirements.

9 Does a Significant Condition Adverse to Quality exist? Yes ___ No <u>X</u> If Yes, Check One: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E	10 Does a stop work condition exist? Yes ___ No <u>X</u> ; If Yes - Attach copy of SWO If Yes, Check One: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C	3 Response Due Date: 20 Working Days From Issuance
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11 Required Actions: Remedial Extent of Deficiency Preclude Recurrence Root Cause Determination

12 Recommended Actions:

7 Initiator Kenneth O. Gilkerson <i>Kenneth O. Gilkerson</i> 8-3-94	14 Issuance Approved by: QADD <i>[Signature]</i> Date 8-5-94
15 Response Accepted QAR <i>[Signature]</i> Date 8/18/94	16 Response Accepted QADD <i>[Signature]</i> Date 8-24-94
17 Amended Response Accepted QAR Date	18 Amended Response Accepted QADD Date
19 Corrective Actions Verified QAR Date	20 Closure Approved by: QADD Date

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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

1. Corrective Action Response for CAR YM-94-070

A. Remedial: This CAR is in error: the title of NLP-3-17 Rev. 01 is not "Development of Waste Isolation Fluctuations," it is "Waste Isolation Evaluations." Although NLP-3-17 Rev. 01 is titled "Waste Isolation Evaluations", the function of the documents prepared under this procedure is not consistent with the use of the term "waste isolation" in Supplement III of the QARD, nor with the QARD definition of scientific investigations. Requirements from Supplement III have not been identified in the requirements traceability matrix for NLP-3-17 Rev. 01. Evaluations addressing waste isolation, as used in the QARD, refer to documents that define repository performance. However, the function of Waste Isolation Evaluations is to provide guidance to site characterization activities and the associated use of tracers, fluids, and materials (TFMs) in the form of work control constraints to avoid adverse impacts to repository performance. Therefore, NLP-3-17 Rev. 01 is not subject to Supplement III requirements for scientific investigations and no remedial action is required at this time. See item C concerning potential remedial action that may result from further investigative actions.

B. Extent of Deficiency

1. The identified condition is present in NLP-3-17 Rev. 00 and Rev. 01. The condition identified in the CAR will not impact the results of WIEs nor their use in Determination of Importance Evaluations.
2. Additional investigations are planned to check extent of deficiency with respect to section 2.0 and 3.0 QARD requirements and existing CARs concerning control of TFMs.

C. Preclude Recurrence:

Closure of CAR YM-94-015 will address all issues related to recurrence of the identified condition.

D. Root Cause Determination: Confusion concerning the applicable QARD requirements for Waste Isolation Evaluations.

2. Response Actions

1. Change name of WIEs to "Site Impact Evaluations".
2. Review line procedure NLP-3-17 with respect to QARD sections 2.0 and 3.0. Revise line procedure as appropriate.
3. Coordinate response for TFM CARs to ensure extent of deficiency is accurate. Amend CAR response if needed.

Responsible: Albin Brandstetter

Anticipated Completion: 12/31/94

3. Response Approved:

Jean L. Younker
Regulatory and Technical Evaluation Manager

Date: 8-16-94