



**Department of Energy**  
Office of Civilian Radioactive Waste Management  
Yucca Mountain Site Characterization Office  
P.O. Box 98608  
Las Vegas, NV 89193-8608

**NOV 30 1994**

Michael D. Voegele  
Science Applications International Corporation  
Bank of America Center, Suite 407  
101 Convention Center Drive  
Las Vegas, NV 89109

EVALUATION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST (CAR)  
YM-94-040 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE  
DIVISION (YMQAD) AUDIT YMP-94-05 OF TECHNICAL AND MANAGEMENT  
SUPPORT SERVICES (SCPB: N/A)

The YMQAD staff has evaluated the amended response to  
CAR YM-94-040. The amended response has been determined to be  
unsatisfactory because activities affecting quality cannot be  
prescribed in memorandums or letters.

Item D, Corrective Action to Preclude Recurrence, states in part:  
"The Science Applications International Corporation Project  
Manager will issue a letter dictating the revised methodology and  
responsibilities for assuring documented evidence of training is  
provided prior to performing the task...."

The Quality Assurance Requirements and Description Document  
(QARD), RW-0333P, Revision 1, Section 5.0, Sub-section 5.2,  
titled "REQUIREMENTS" states: "Work shall be performed according  
to controlled documents." The only acceptable means to modify or  
amend a process is through a revision of an existing procedure.

Please modify Item D in your response to reflect: (1) the  
procedure which will be revised to incorporate the revised  
methodology for documenting real time training, and (2) the date  
in which the procedure will be approved and released. This  
action will be consistent with the requirements of the QARD.

An amended response is required to be submitted to this office  
within ten working days of the date of this letter. Send the  
original of your response to Deborah Sult, YMQAD/QATSS,  
101 Convention Center Drive, Suite 640, Las Vegas,  
Nevada 89109. If an extension to the due date is necessary, it  
must be requested in writing, with appropriate justification,  
prior to that date.

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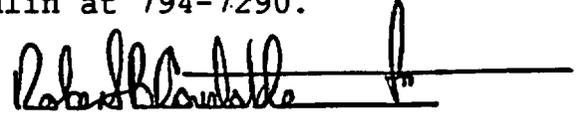
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Michael D. Voegele

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If you have any questions, please contact either Robert B. Constable at 794-7945 or Richard L. Maudlin at 794-7290.



YMQAD:RBC-1006

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

Enclosure:  
CAR YM-94-040

cc w/encl:

~~D. G. Spradl~~, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
D. K. Chandler, M&O/SAIC, Las Vegas, NV  
J. R. Gonzales, M&O/SAIC, Las Vegas, NV  
L. D. Foust, M&O/TRW, Las Vegas, NV  
K. B. Johnson, M&O/IRG, 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

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

**ORIGINAL**  
A RED STAMP: *Draft IM-94-40*  
PAGE: 1 OF 1  
QA

**CORRECTIVE ACTION REQUEST**

<b>1 Controlling Document</b> SP 1.32, Revision 8	<b>Initial Evaluation, Qualification, Indoctrination and training of TMSS personnel</b>	<b>2 Related Report No.</b> Audit Report YMF-94-05
<b>3 Responsible Organization</b> SAIC/T&MSS	<b>4 Discussed With</b> P. Chadwick/K. Johnson/J. Harper	
<b>5 Requirement:</b> SP 1.31, Section 3.0 states in part: "Employees may perform quality-affecting activities prior to completing full position qualification;... However, the manager assigning such activities must insure that the employee has been trained to the document(s) governing those activities...have been documented before quality-affecting activities are performed."		
<b>6 Adverse Condition:</b> Contrary to the above, there is no objective evidence to reflect that five individuals, who participated in the review and comment of TMSS/93-003 (Organizational Description), had completed training to SP 1.2, Revision 6, prior to performing the activity.		
<b>9 Does a Significant Condition Adverse to Quality exist? Yes ___ No <u>x</u></b> If Yes, Circle One: A B C D E	<b>10 Does a stop work condition exist? Yes ___ No <u>x</u></b> ; If Yes - Attach copy of SWO If Yes, Circle One: A B C	<b>3 Response Due Date:</b> 20 Working days from issuance.
<b>11 Required Actions:</b> <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Extent of Deficiency <input type="checkbox"/> Preclude Recurrence <input type="checkbox"/> Root Cause Determination		
<b>12 Recommended Actions:</b> Revise the "Real Time Training requirement to reflect that the specific procedure to perform the task was read <u>prior</u> to performing the activity.		
<b>7 Initiator</b> Richard L. Maudlin    5/19/94 <i>Maudlin</i>	<b>14 Issuance Approved by:</b> QADD <i>[Signature]</i> Date 5.27.94	
<b>15 Response Accepted</b> QAR <i>Maudlin</i> Date 07/06/94	<b>16 Response Accepted</b> QADD <i>[Signature]</i> Date 5.12.94	
<b>17 Amended Response Accepted</b> QAR    Date	<b>18 Amended Response Accepted</b> QADD    Date	
<b>19 Corrective Actions Verified</b> QAR    Date	<b>20 Closure Approved by:</b> QADD    Date	

**ENCLOSURE**

Corrective Action Response for CAR YM94-040

**A. Remedial Action**

No remedial action is required. The review of TMSS/93-003 (Organizational Description) was conducted in accordance with SP 1.2 (the controlling procedure) and in accordance with the Real-Time Training provisions of SP 1.31. All five individuals cited in the CAR completed real-time training and documented such training on TMSS/098 forms and were included in the QA records package (See NNA.930804.0095 dated 7/28/93). The TMSS/098 form has a statement, written in the past tense - "I read, understood, and complied with the following Procedure....", within the reviewer signature block to facilitate the documentation of real-time training. The reviewer completes the statement by annotating the procedure number and revision level to which the reviewer performed real-time training. The dated certifying signature of each reviewer indicates that real-time training was accomplished prior to the start of the review process and that all mandatory comments were resolved to the satisfaction of the reviewer. The basis for this is provided below:

SP 1.31, Rev. 8, paragraph 4.4.4 provides that the employee performs "... real-time training on... The QA record produced by the activity." The definition of Real-Time Training states.... "This method... requires the individual to read and understand the document prior to performing the activity."

SP 1.2 requires the use of form TMSS/098 that provides for certification the he (she) has completed the required training for the review and performed the review in accordance with the controlling procedure. Paragraph 4.5.7 requires the Reviewer to withhold his signature until all mandatory comments have been resolved. Thus the procedure allows the date of concurrence with the document to follow the training on the procedure.

**B. Extent of the Deficiency**

N/A. See above.

**C. Root Cause Determination**

N/A.

**D. Corrective Action to Preclude Recurrence**

It is understandable that the auditor had some questions about the Real-Time Training documentation. The Real-Time Training process does not always provide documentation of the actual date of the individuals training. The date of the signature may be subsequent to the actual date of the Real-Time Training. The date in the signature block is the date of completion of the review process for the individual reviewer. The signature certifies that training was accomplished prior to review actions.

**D. Corrective Action to Preclude Recurrence (continued)**

Nevertheless, T&MSS will revisit the Real-Time Training to determine an appropriate future course of action for T&MSS. Additionally, the Document Comment form, TMSS/095, will be modified to provide certification that training was accomplished prior to completion of the Document comment form. These actions will be completed within 90 days of this response by the T&MSS Training and QA managers.

Responsible Manager AK Chandera Date 6/27/96

OFFICE OF CIVILIAN  
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U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

<sup>8</sup> CAR NO. Ym-94-09  
PAGE \_\_\_\_\_ OF \_\_\_\_\_  
QA

CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

Verification of Corrective Action to CAR YM-94-40

A review of the Interoffice Memorandum from D. Chandler to Distribution, dated 09/09/94, and the sample copy of the Document Comments form, Form No. TMSS/095, was performed.

The results of the evaluation of the above do not acceptably resolve the noted condition. The QARD, Revision 1, Section 2.2.11 (H) states: "Ensure the required indoctrination and training for a specified task is completed prior to performing the task. SP 1.32, which was sited in the CAR appears to support the QARD requirement. What is lacking and was identified during the audit, is that the methodology used to document Real-Time Training is after the fact. The date that this training is documented is after the completion of the task. The statement used in the real time training states in part: "I have read, understood....". The have read implies past tense, but the specific date in which the training took place is not documented. This does not satisfy the minimum requirements set forth in the QARD or SP 1.32. The actual date when the training occurred must be documented and reflect a date prior to the performance of the task.

Please re-evaluate your response and corrective action and take the necessary measures to bring real-time training into compliance with the QARD.

  
\_\_\_\_\_  
R.L. Maudlin

10/21/94  
Date

DKC:PAC:lkb:M94-059

QA: L

**INTEROFFICE MEMORANDUM**

**DATE:** September 9, 1994

**TO:** Distribution

**FROM:** Douglas K. Chandler, Deputy Project Manager, 517/T-44  
Technical and Management  
Support Services



**SUBJECT:** Real-Time Training (SCPB: N/A)

As a result of actions required to respond to Corrective Action Request YM-94-040, the Training Department has performed an assessment of the viability of and documentation method for real time training. Real-time training and its associated documentation method appear to be well understood by T&MSS staff.

Real-time training was initially established by T&MSS in May of 1991 to allow staff members to document their reading prior to performing a quality-affecting activity. It was and still is specifically targeted at documents which are not part of a staff member's baseline training requirements. Typically, these documents govern activities which are not part of an individual's normally assigned responsibilities. Later, the Yucca Mountain Site Characterization Office adapted real-time training into its training procedure (then QMP-02-01) with one difference. That difference allows individuals to not perform real-time training if the document in question is part of the individual's baseline training requirements.

In certain cases, processes may extend for a period of time lasting longer than one day, and the individual performing the process does not document real-time training until the process is finished. Given that T&MSS staff understand that they must perform real-time training prior to performing a quality-affecting activity, the documentation serves as testament to their performance of training prior to performance of the activity.

There appears to be no added value in changing the real-time training process or documentation method.

Distribution  
DKC:PAC:ikb:M94-059  
September 9, 1994  
Page Two

It should be noted that real-time training does not and is not intended to take the place of maintenance or continuing training assigned to an individual on a Training Assignment form. Real-time training is intended to be used for activities performed by an individual on an ad-hoc or infrequent basis.

Distribution:  
G. Kenton Beall, T-17  
Robert S. Bostian, T-28  
Michael W. Harris, T-29  
Beatrice E. Reilly, T-18  
Terry D. Tait, T-46

cc:  
L. K. Bouie, T-19  
P. A. Chadwick, T-19  
D. K. Chandler, T-44  
K. B. Johnson, T-38  
J. D. Weaver, T-04

**Revised Corrective Action Response  
for CAR YM-94-040**

**A. Remedial Action**

The review of TMSS/93-003, Organizational Description, was performed in accordance with SP 1.2. Real-time training was conducted in accordance with the reviewed and approved provisions of SP 1.31. All five individuals cited in CAR YM-94-040 completed real-time training and documented the training on TMSS/98 form as required by the controlling procedure.

By definition, real-time training is performed prior to actual performance of work. Verbatim compliance requirements of this project require that procedures be followed exactly as written. Therefore, no remedial action is required.

**B. Extent of Deficiency**

N/A

**C. Root Cause Determination**

N/A

**D. Corrective Action to Preclude Recurrence**

Individuals performing real-time training will sign and date the real-time training statement on all records documenting quality affecting activities prior to performing the activity. Signature and date on the real-time training statement will be in addition to signature and date for completion of the task. Signature and date on the real-time training statement documents the specific date in which training was performed and provides objective evidence that training was performed prior to accomplishing the task.

The SAIC Project Manager will issue a letter dictating the revised methodology and responsibilities for assuring documented evidence of training is provided prior to performing the task. Completion date of this action will be 15 working days after acceptance of this response by the Yucca Mountain Quality Assurance Division.

Responsible Manager: MDV for MDV Date: 11/16/94  
M.D. VOEGELT

11/15/94

MDV: RER:JS:L94-085