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QA: L

November 15, 1994

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division  
U.S. Department of Energy  
Nevada Operations Office  
P.O. Box 98608  
Las Vegas, NV 89193-8608

REVISED RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-94-040,  
CONTRACT #DE-AC08-87NV10576 (SCP: N/A)

Enclosed is the revised response to Corrective Action Request (CAR) YM-94-040 generated  
by Yucca Mountain Quality Assurance Division Audit YM-94-05.

If you have any questions, please contact Paul Chadwick at 794-7281.

  
for Michael D. Voegle  
Project Manager  
Technical & Management Support Services

MDV:RER:js:L94-085

Enclosure:  
Response to CAR YM-94-040

cc w/encl:  
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**OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.**

5-29-94  
A RED STAMP: Draft YM-94-40  
PAGE: 1 OF 1  
QA

**CORRECTIVE ACTION REQUEST**

1 Controlling Document SP 1.32, Revision 8		Initial Evaluation, Qualification, Indoctrination and training of TEMSS personnel	2 Related Report No. Audit Report YMP-94-05	
3 Responsible Organization SAIC/TEMSS		4 Discussed With P. Chadwick/K. Johnson/J. Harper		
5 Requirement: 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."				
6 Adverse Condition: 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.				
9 Does a Significant Condition Adverse to Quality exist? Yes ___ No <u>x</u> If Yes, Circle One: A B C D E		10 Does a stop work condition exist? Yes ___ No <u>x</u> ; If Yes - Attach copy of SWO If Yes, Circle One: A B C		3 Response Due Date: 20 Working days from issuance.
11 Required Actions: <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Extent of Deficiency <input type="checkbox"/> Preclude Recurrence <input type="checkbox"/> Root Cause Determination				
12 Recommended Actions: 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.				
7 Initiator Richard L. Maudlin 5/19/94		14 Issuance Approved by: QADD <i>[Signature]</i> Date 5-27-94		
15 Response Accepted QAR <i>[Signature]</i> Date 07/06/94		16 Response Accepted QADD <i>[Signature]</i> Date 5-12-94		
17 Amended Response Accepted QAR _____ Date _____		18 Amended Response Accepted QADD _____ Date _____		
19 Corrective Actions Verified QAR _____ Date _____		20 Closure Approved by: QADD _____ Date _____		

ENCLOSURE

**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: MD Voegelé for Date: 11/16/94  
M.D. VOEGELE