



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

QA: L

SEP 2 1994

Donald G. Horton, Acting Director, Office of Quality Assurance
(RW-3) NV
ATTN: Robert W. Clark, HQ (RW-3.1) FORS

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR)
YM-94-060 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE
DIVISION (YMQAD) AUDIT YMP-94-07 OF U.S. DEPARTMENT OF
ENERGY/HEADQUARTERS QUALITY ASSURANCE DIVISION (SCPB: N/A)

The YMQAD staff has evaluated the response to CAR YM-94-060. 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 Raul A. Hinojosa at 794-7991.

YMQAD:RBC-4943

Richard E. Spence, Acting Director
Yucca Mountain Quality Assurance Division

Enclosure:
CAR YM-94-060

cc w/encl:

D. A. Dreyfus, HQ (RW-1) FORS
L. W. Barrett, HQ (RW-2) FORS
R. L. Johnson, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
T. L. Badredine, M&O/TRW, 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. | | 8 CAR NO.: <u>YH-94-060</u> PAGE: <u>1</u> OF <u>2</u> QA |
| CORRECTIVE ACTION REQUEST | | |
| 1 Controlling Document QAAP-2.2, Revision 1, Verification of Personnel Qualifications | | 2 Related Report No. OCRWM QA Audit YMP-94-07 |
| 3 Responsible Organization RW-3.1 | 4 Discussed With R. Clark/L. Wagner | |
| 5 Requirement: QAAP-2.2, Revision 1 states: (1) Paragraph 6.1.1 - "Supervisors shall develop position descriptions for those employees who perform under their direct supervision, activities subject to QA Program control." (Continued on next page) | | |
| 6 Adverse Condition: Contrary to the above requirements, a review of records for three QATSS personnel revealed the following: (1) No objective evidence of documented position descriptions, (2) No objective evidence of statements of qualifications for positions being held, (3) No objective evidence that a copy of the completed PQS with supporting documentation has been transmitted to the appropriate administrative support personnel as evidenced by the signed transmittal sheet at the HQ QATSS office, (4) Records at the QRC are incomplete, and (5) The working files at the HQ QATSS office are incomplete. | | |
| 9 Does a Significant Condition Adverse to Quality exist? Yes ___ No <input checked="" type="checkbox"/> 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 <input checked="" type="checkbox"/> 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 |
| 11 Required Actions: <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Extent of Deficiency <input checked="" type="checkbox"/> Preclude Recurrence <input checked="" type="checkbox"/> Root Cause Determination | | |
| 12 Recommended Actions: 1) Perform an investigation to determine extent of deficiencies. 2) Correct all deficiencies cited and any other deficiencies found during the investigation to determine the extent of the deficiency. (Continued on next page) | | |
| 7 Initiator Raul A. Binojosa <i>JE Review for</i> 9/28/94 | 14 Issuance Approved by: QADD <i>[Signature]</i> for Date 7-29-94 | |
| 15 Response Accepted QAR <i>Raul A. Binojosa</i> Date 9/1/94 | 16 Response Accepted QADD <i>[Signature]</i> for Date 9-2-94 | |
| 17 Amended Response Accepted QAR _____ Date _____ | 18 Amended Response Accepted QADD _____ Date _____ | |
| 19 Corrective Actions Verified QAR _____ Date _____ | 20 Closure Approved by: QADD _____ Date _____ | |

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

8 CAR NO.: YM-94-060
PAGE: 2 OF 2
QA

CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

5 Requirements (continued)

- (2) Paragraph 6.2.2 - "The supervisor shall complete the Position Qualification Statement (Attachment 2) (PQS) and attach objective evidence of verification, such as statements from colleges, and signed and dated telephone conversation records that support the stated education and experience."
- (3) Paragraph 6.3.1 - "The supervisor shall transmit a copy of the completed PQS with supporting documentation to the appropriate administrative support personnel...to complete the hiring process."
- (4) Paragraph 6.3.2 - "Upon completion of the hiring process, the supervisor shall transmit the completed PQS with supporting documentation directly to the Quality Records Center (QRC) in accordance with QAAP-17.1, QA RECORDS MANAGEMENT."
- (5) Paragraph 6.3.3 - "The supervisor shall also retain a copy as the office working file...."

13 Recommended Action(s) (continued)

- 3) Determine the root cause and install or reinforce existing controls to prevent recurrence.

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CAR NO. YM-94-060
PAGE: _____ OF _____
QA

CORRECTIVE ACTION REQUEST (Continuation Page)

Corrective Action for CAR #YM-94-060

A. Remedial Action

The records of the three QATSS personnel will be completed by adding the position description, adding the PQS, adding documentation that shows the documents are with the appropriate administrative support personnel, submitting missing QA Records to the QRC, and ensuring the QATSS personnel qualification working files contain the necessary documentation..

Responsible person: Lester Wagner
Completion date: September 15, 1994

B. Extent of the Deficiency

QATSS will review all HQ QATSS personnel qualification working files and QRC files for related deficiencies. A compilation of actions taken will be available for the record at the time of verification closure of this CAR.

Responsible Person: Lester Wagner
Completion Date: December 31, 1994

C. Root Cause Determination

The root cause has been determined to be that the responsible supervisor believed that the training area was being effectively handled when he assumed the supervisory role. The supervisor also was not properly trained in procedure QAAP-2.2, "Verification of Personnel Qualifications". In addition, loss of records management personnel and realignment of the records management job functions caused for lack of continuity in the formal control of initial personnel qualifications documentation.

D. Corrective Action to Preclude Recurrence

A Technical Assistant has been designated as responsible for maintaining the personnel qualification working files and forwarding records to the QRC. This assignment along with training the supervisor in HLP 2.1Q will provide the knowledge to preclude recurrence.

Responsible Person: Lester Wagner
Completion Date: August 31, 1994

R. W. Clark
R. W. Clark

8/19/94
Date

8/22/94 LTR. CLARK TO SULT