



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 19 1994

L. Dale Foust  
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-94-052 RESULTING FROM U.S. DEPARTMENT OF ENERGY/HEADQUARTERS  
QUALITY ASSURANCE DIVISION'S (HQAD) AUDIT HQ-94-02 OF THE  
CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT AND  
OPERATING CONTRACTOR (CRWMS M&O) (SCPB: N/A)

The Yucca Mountain Quality Assurance Division (YMQAD) staff has evaluated the response to CAR YM-94-052. The response has been determined to be unsatisfactory because it does not adequately address the Extent of Deficiency or Root Cause. Please submit an amended response that addresses the following issues:

1. The current Extent of Deficiency response does not identify the actual extent of the problem; it only details that a "review" will occur. There is no explanation as to how this review will be documented and if the CAR will be amended.
2. Concerning the root cause explanation, it is evident that responsibility had been delegated to CRWMS M&O supervisory personnel for the subject packages. Specifically, the Design Verification Record for Design Package 1B clearly documents that Supervision was responsible for the establishment and approval of review instructions/criteria. Also, a central focal point was clearly established for the results of the review. It appears that the identified root cause does not deal with the actual condition.
3. The Design Verification Record and its implementation is similar to the implementation of Documentation Review Records (DRR) via Quality Assurance Procedure (QAP) 3.1. The CRWMS M&O needs to identify what actions will take place to specifically preclude recurrence of the same problems

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relative to use of DRRs. This same scenario applies to the Design Verification Leader or Review Coordinator and the associated responsibilities and the responsibilities of the Design Verification Chairperson. The revision of QAP 3.2 alone does not provide the necessary recurrence control.

4. The last two sentences under Corrective Action to Preclude Recurrence are difficult to understand and what correlation they have to recurrence control.
5. A date for full compliance must be provided. The current response for Item D does not provide the date.

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.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Robert L. Howard at 794-7820.



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

YMQAD:RBC-5055

Enclosure:  
CAR YM-94-052

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  
R. P. Ruth, M&O/TRW, Las Vegas, NV  
Richard Jiu, M&O/Duke, Las Vegas, NV  
D. G. Horton, OQA (RW-3) NV  
R. M. Nelson, Jr., YMSCO, 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. YM-94-052  
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QA

CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

A. REMEDIAL ACTION:

- Review the Design Verification Document review records for Design Package 1B for all discrepancies and make required corrections.

Responsible Individual: Matthew Gomez  
Completion Date: 10/15/94

- Determine any potential impacts to Design Package 1B based in the resolution of comments and make required corrections.

Responsible Individual: Matthew Gomez  
Completion Date: 10/15/94

B. EXTENT OF DEFICIENCY:

- Review ESF Surface Design Packages that required design verification for similar discrepancies.

Responsible Individual: Matthew Gomez  
Completion Date: 10/15/94

C. ROOT CAUSE DETERMINATION:

- Document Review Records (DRRs) were handled by several individuals during the review process. There was not an individual assigned to ensure that the documents were complete nor that they complied with procedural requirements. In addition, attention to specific procedural requirements by individuals completing the forms was not sufficient despite self-study training

D. CORRECTIVE ACTION TO PRECLUDE RECURRENCE:

- QAP-3-2 has been revised. Rev 05 does not use QAP-3-1 for performing design verification by design review. The Document Review Record (DRR) has been replaced by the Design Verification Record (DVR). Paragraph 3.6 defines the Design Verification Leader as "The individual assigned to ensure that the design verification is completed in accordance with this procedure. Throughout the procedure the Design Verification leader is given responsibility to initiate/compile/develop/complete various elements of the required forms and documentation in accordance with procedural requirements, and is the focal point for coordinating these documents in the development stage.

- The discrepancies identified will be corrected by the reviewing ESF Surface Design. Extent of Deficiencies and evaluating impact of discrepancies on packages.

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