

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 1 9 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 note 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.

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YMOAD:RBC-5055

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

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 L. Dale Foust

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OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT LS. DEPARTMENT OF ENERGY WASHINGTON, D.C. CORRECTIVE ACTION RECUEST 'Controlling Document U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C. 'Controlling Document Controlling Document Controlling Document Controlling Document Controlling Document Controlling Document Controlling Document 'Action Controlling Document Controlling Controlling Document Controlling Contreling Contreling Controlling Con		•			.• i	CRICINA THIS IS A RED ST
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MAD QAE-3-1. Technical Document Review. Rev. 4 P01 HQ-94-02 ³ Responsible Organization * Discussed With M. DeLeone, F. Arth, J. Cassidy, J. Willis ⁴ Requirement: Paragraph 5.4.3 requires that the Lead Document Preparer ensures that all responses to mandatory comments have been accepted and that all concurrence signatures for the updated document have been obtained. Also the Lead Document Preparer must ensure that all DRRs are completed with mandatory comments (initiated and date or with resolution memorandum attached) and that Block 8 (concurrence with updated document) has been signed and date Finally, the Lead Document Preparer must update the records package for the document to reflect the resolutions and subr to LRC. * Adverse Condition: The Document Review Record for the Design Verification (Design Review) conducted in relation to Design Package 1B, th was presented to the audit team contains numerous examples of the following: 1. Comment number missing 2. Section/paragraph reference missing 3. Accepted Contine reviewer is missing 7. Resolution of the reviewers rejected comment. 1. Indication as to whether or not it is quality affecting. (i.e., yes or no) is missing 6. "Reviewed by" signatures and dates are missing 7. Thesponse by" signatures and dates are missing 8. No.x.; if Yes. Antoh copy of SWC from issuance If Yes, Circle One: A (B) C D E <td></td> <td>CO</td> <td>DRRECTIV</td> <td>E ACTION REQUEST</td> <td></td> <td></td>		CO	DRRECTIV	E ACTION REQUEST		
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ENCLOSURE

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

8. Car no. YM-94-052 page 1 of 1 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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