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Department of Energy
Washington, DC 20585

QA: QA

MAY 08 2003

MEMORANDUM FOR: Mark E. Van Der Puy (RW-30W)

FROM: R. Dennis Brown, Director
Office of Quality Assurance

SUBJECT: Issuance and Closure of Deficiency Report (DR) OCRWM(O)-03-D-124 Resulting From Issuance of Management Procedure MP-5.1Q Without Compliance With Administrative Procedure AP-5.1Q

The condition identified in DR OCRWM(O)-03-D-124 was evaluated and found not to be a condition adverse to quality. As a result, this DR is being issued and closed simultaneously.

If you have any questions, please contact either Kerry M. Grooms at (702) 794-1367 or James Blaylock at (702) 794-1420.

OQA:KMG-1152

Enclosure:
DR OCRWM(O)-03-D-124

cc w/encl:
James Blaylock, DOE/OQA (RW-3), Las Vegas, NV
N. K. Stablein, NRC, Rockville, MD
Robert Latta, NRC, Las Vegas, NV (2 cys)
S. W. Lynch, State of Nevada, Carson City, NV
L. W. Bradshaw, Nye County, Pahrump, NV
R. E. Powe, BSC, Las Vegas, NV
W. J. Glasser, NQS, Las Vegas, NV
D. G. Opielowski, NQS, Las Vegas, NV
B. M. Terrell, DOE/ORD (RW-40W), Las Vegas, NV

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

8. ☒ DEFICIENCY REPORT
☐ CORRECTIVE ACTION REPORT

NO. OCRWM(O)-03-D-124

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DEFICIENCY REPORT/CORRECTIVE ACTION REPORT

1. Controlling Document: (Document ID and Revision or Date)	2. Related Report No.:
AP-5.1Q, Rev 3/ICN 3	N/A
3. Responsible Organization:	**4. Discussed With:**
OCRWM	Lester Wagner

5. Requirement:
AP-5.1Q/Rev. 3/ICN 3 *Plan and Procedure Preparation, Review, and Approval* states in part:

"5.3 CANCELLING OR SUPERSEDING A PLAN OR PROCEDURE

Use this section for canceling a plan or procedure or to process a superseded procedure that has remained in place temporarily to complete in-process work. a procedure that is being superseded without the need for transition is processed using subsection 5.2. ..

(Continued on page 2)

6. Description of Condition:
OCRWM issued procedure MP-5.1Q Processing of Procedures effective 2/14/2003 without complying with AP-5.1Q Section 5.3.

The change history for MP-5.1Q Rev 0 states: "Supersedes AP-5.1Q, *Plan and Procedure Preparation, Review, and Approval.*"

Discussion:
As of 3/24/2003 MP-5.1Q remains on the controlled documents list and is still in violation of AP-5.1Q. Although this DR was presented to QOA for action on 3/9/03, no action has been taken. It is now submitted as a pending DR.

Has work been stopped? ☐ Yes ☒ No

7. Initiator:			9. Does a stop work condition exist?
R. E. Powe	R E Powe	3/24/2003	☐ Yes ☒ No ☐ N/A
Printed Name	Signature	Date	If Yes, Check One: ☐ A ☐ B ☐ C ☐ D

10. Recommended Actions:
None.

11. QA Review:			12. Response Due Date:
James Blaylock	James Blaylock	4/7/03	10 Working Days after Issuance
Printed Name	Signature	Date	

13. QAM Issuance Approval:
Printed Name R. Dennis Brown — Signature R Dennis Brown — Date 4/25/03

14. Corrective Actions Verified/Closure: No Corrective Actions			15. QAM Closure Approval:		
KM Grooms		4/25/03	R. Dennis Brown	R Dennis Brown	4/28/03
QAR Printed Name	Signature	Date	Printed Name	Signature	Date

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☒ DR/CAR/QO
☐ SWO

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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

Block 5 Requirements (Continued)

AP-5.1Q paragraph 5.2 (continued)

Preparer:

a) Prepare a title page and change history that identifies the plan or procedure as cancelled or the procedure as superseded, ensuring that it is processed at the current revision/change level.

b) Evaluate any open DARs for inclusion in replacement plans or procedures and ensure DARs reflect the correct disposition.

c) Complete the Document Development form for plans and procedures. In addition, provide justification for plan or procedure cancellations in the Activity Summary Section and include the identification of any continuing requirements incorporated in other plans or procedures.

d) If applicable, update a requirements matrix in accordance with Attachment 9, Requirements Matrix Input.

e) Forward the title page, change history, and document development package that includes, as applicable, the Document Development form, the requirements matrix, and associated DARs to the Responsible Individual and proceed to Subsection 5.5."

Submittal Page 1 of 2

2. Check if Amended ☐
Check if also Initial Response ☑

3. Extended Processing

☑ No ☐ Yes (If yes, submit Extended Processing request)

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DEFICIENCY REPORT/CORRECTIVE ACTION REPORT COMPLETE RESPONSE

4. Extent of Condition: (Amended response will be required if all Extent of Condition investigations are not complete and documented herein)

None required, no condition adverse to quality exists. See the continuation sheet for details.

5. Impact: (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)

None required, no condition adverse to quality exists. See the continuation sheet for details.

6. Remedial Actions: (Document all actions necessary to address the results of the Extent of Condition)

None required, no condition adverse to quality exists. See the continuation sheet for details.

7. ☐ Root Cause (For a significant CAQ, attach results of formal root cause determination prepared in accordance with AP-16.4Q)
☐ Apparent Cause N/A

A review of the applicable QARD requirements and implementing procedures determined that a condition adverse to quality does not exist. See the continuation sheet for more detail.

8. Action to Preclude Recurrence: (Address those actions necessary to prevent the identified cause from recurring)
None required, no condition adverse to quality exists. See the continuation sheet for details.

9. Due Date for Completion of Corrective Action:
N/A

10. Responsible Manager:
R. D. Brown — Dennis Brown — 4/28/03
Printed Name — Signature — Date

11. QAR Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject
☐ Re-evaluated for significance
K.M. Grooms — [signature] — 4/28/03
Printed Name — Signature — Date

12. QAM Concurrence:
R. D. Brown — Dennis Brown — 4/28/03
Printed Name — Signature — Date

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RADIOACTIVE WASTE MANAGEMENT
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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

The Director, Office of Quality Assurance, has determined that the condition identified on this Deficiency Report (DR) is not a condition adverse to quality.

The basis for this Deficiency Report (DR) is that AP-5.1Q, Plan and Procedure Preparation, Review, and Approval,was superseded by MP-5.1Q, Processing of Procedures. Both procedures describe a process for the preparation, review, approval, and revision of procedures. However, the scope of AP-5.1Q and MP-5.1Q are not the same. AP-5.1Q applies to Administrative Procedures (APs) and Line Procedures (LPs) whereas MP-5.1Q applies to Management Procedures (MPs), Office Procedures (OPs), and Team Procedures (TPs).

The Change History of MP-5.1Q does state that it supersedes AP-5.1Q. The intention was to transition from the APs and LPs, controlled under AP-5.1Q, to MPs, OPs, and TPs controlled under MP-5.1Q as part of the overall procedure transition effort. Eventually, when all APs and LPs had been replaced, AP-5.1Q would have been cancelled and the process described in MP-5.1Q would have 'superseded' the process described in AP-5.1Q.

Since MP-5.1Q (because of the different scope) did not supersede AP-5.1Q when it was issued the requirement of AP-5.1Q to prepare a title page and change history did not need to be performed. As stated above, when AP-5.1Q was no longer needed it would have been cancelled.