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Department of Energy

Washington, DC 20585

QA: N/A

MAY 06 2003

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

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

SUBJECT: Evaluation of Responses and Verification of Corrective Action and Closure of Deficiency Report (DR) ORD(O)-03-D-108 Resulting From Inadequate Planning for Procedure Transition

The Office of Civilian Radioactive Waste Management staff has evaluated the Amended Initial and Complete responses to and verified the corrective actions of DR ORD(O)-03-D-108 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either Kerry M. Grooms at (702) 794-1367 or Donald J. Harris at (702) 794-1467.

OQA:KMG-1120

Enclosure:
DR ORD(O)-03-D-108

- 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
- W. J. Glasser, NQS, Las Vegas, NV
- D. J. Harris, NQS, Las Vegas, NV
- D. G. Opielowski, NQS, Las Vegas, NV
- L. W. Wagner, NQS, Las Vegas, NV
- B. M. Terrell, DOE/ORD (RW-40W), Las Vegas, NV
- V. W. Trebules, DOE/ORD (RW-20W), Las Vegas, NV

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 WASHINGTON, D.C

ORIGINAL
 THIS IS A RED STAMP

8. Deficiency Report
 Corrective Action Report
 No. ORD(O)-03-D-108
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 QA: QA

DEFICIENCY REPORT/CORRECTIVE ACTION REPORT

1. Controlling Document: (Document ID and Revision or Date)
 DOE/RW-0333P, Rev. 12, "Quality Assurance Requirements and Description"

2. Related Report No.:
 OQA-SI-03-014

3. Responsible Organization:
 Office of Repository Development (ORD)

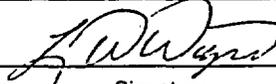
4. Discussed With:
 Melinda D'Ouille, Dennis Brown, Elaine Mew, James King,
 Mark Van der Puy

5. Requirement:
 QARD 2.2.5, Planning Work, "Planning shall be documented to ensure work is accomplished under suitably controlled conditions."

6. Description of Condition:
 A planning document; i.e., a transition plan, was not prepared by DOE that was adequate to control the transition of procedures without interrupting ongoing work. The following examples of objective evidence were found to support this adverse condition:

1. Ninety-seven procedures were superceded with "BSC only" procedures, which left DOE without several implementing procedures. Examples of procedures used by DOE which were cancelled:
 - AP-2.1Q, *Indoctrination and Training of Personnel* (BSC-AP-HR-0001)
 - AP-2.2Q, *Establishment and Verification of Required Education and Experience of Personnel* (BSC-AP-HR-0002)
 - AP-2.6Q, *Readiness Review* (BSC-AP-PM-0003)
 - AP-2.19Q, *Quality Assurance Requirements and Description Requirements Matrix and Impact Evaluation* (BSC-AP-PM-0001)
 - AP-7.4Q, *Supplier Evaluation and Qualified Supplier List (QSL) Maintenance* (BSC-AP-QA-0005)
 - AP-17.1Q, *Record Source Responsibilities for Inclusionary Records* (BSC-AP-RMD-0001)
 - AP-SV.1Q, *Control of the Electronic Management of Information* (BSC-AP-CIO-0014)
2. A new procedure numbering system was initiated without regard to the number of other procedures impacted due to the procedure references they contain and the effort involved in updating them. Examples of the number of procedures that will need to be updated due to renumbering:
 - AP-2.1Q, referenced in 40 documents
 - AP-7.4Q, referenced in 7 documents
 - AP-17.1Q, referenced in 550 documents
 - AP-SV.1Q, referenced in 132 documents

Has work been stopped? Yes No

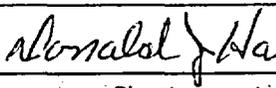
7. Initiator:
 Lester W. Wagner  4/8/03

9 Does a stop work condition exist?
 Yes No N/A

Printed Name Signature Date

If Yes, Check One: A B C D

10. Recommended Actions:
 None

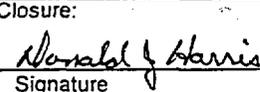
11. QAR Review:
 Donald J. Harris  4/9/03

12 Response Due Date:
 10 Working days after issuance.

Printed Name Signature Date

13. QAM Issuance Approval:
 R. Dennis Brown  4/10/03

Printed Name Signature Date

14. Corrective Actions Verified/Closure:
 DONALD J. HARRIS  4/29/03

15. QAM Closure Approval:
 R. Dennis Brown  5/5/03

QAR Printed Name Signature Date Printed Name Signature Date

Submittal Page 1 of 1

2. Check if Amended

3. Extended Processing

No Yes (If yes, submit Extended Processing request)

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DEFICIENCY REPORT/CORRECTIVE ACTION REPORT INITIAL RESPONSE

4. Immediate Actions Necessary to Bring the Process Under Control: (If none, provide justification statement)
None. OQA has issued stop work order on BSC procedure transition process.

Date when process will meet requirements: N/A

5. Immediate Remedial Actions Completed:

1. Senior DOE and BSC management have met to define expectations for procedure transition (TDL No. 03-017).
2. A Project Operations Review Board (PORB) position paper (030409-01) has been accepted, with comment, and approved by the Deputy Director, ORD. This paper defines the process for implementing the requirements of the TDL and established appropriate controls over the procedure transition effort.

6. Plan for Determining the Extent of Condition:

OPS will review other ongoing ORD work activities to determine if other transition efforts exist requiring management controls. Additionally, OPS will review previous project transition efforts to look for common success or failure causes to identify the need for further corrective action.

*Superseded by response dated
4/24/03
DSG
4/28/03*

7. Due Date for Submittal of Completed Response:

5/9/03

8. Response by: (Responsible Manager)

Mark E. Van Der Puy [Signature] 4/22/03
Printed Name Signature Date

9. QAR Evaluation: Accept Partially Accept Reject

10. QAM Concurrence:

Donald J HARRIS [Signature] 4/23/03
Printed Name Signature Date

N/A
Printed Name Signature Date

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2. Check if Amended

3. Extended Processing

No Yes (If yes, submit Extended Processing request)

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1. DR/CAR NO. ORD(O)-03-D-108
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DEFICIENCY REPORT/CORRECTIVE ACTION REPORT INITIAL RESPONSE

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6. Plan for Determining the Extent of Condition:

None. This was an isolated occurrence. Due the stop work order and the immediate actions taken in response to BSC(O)-03-C-097, the BSC blue sheets which began to appear on the OCRWM Program Documents Database on 2/10/03 were rescinded on 3/03/03, and the original documents restored. There is no evidence of impact

7. Due Date for Submittal of Completed Response:

4/30/03

8. Response by: (Responsible Manager)

Mark E. Van Der Puy
Printed Name

Signature

4/24/03
Date

9. QAR Evaluation: Accept Partially Accept Reject

Donald J. HARRIS Donald J. Harris 4/28/02
Printed Name Signature Date

10. QAM Concurrence:

R. Dennis Brown R. Dennis Brown 5/5/03
Printed Name Signature Date

Submittal Page 1 of 1

- 2. Check if Amended
- Check if also Initial Response
- 3. Extended Processing
- No Yes (If yes, submit Extended Processing request)

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1. DR/CAR NO. ORD (O) -03-^{D-108}108
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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. This was an isolated occurrence. Due the stop work order and the immediate actions taken in response to BSC(O)-03-C-097, the BSC blue sheets which began to appear on the OCRWM Program Documents Database on 2/10/03 were rescinded on 3/03/03, and the original documents restored. There is no evidence of impact.

5. Impact: (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)
None.

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

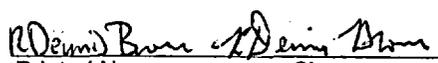
7. Root Cause (For a significant CAQ, attach results of formal root cause determination prepared in accordance with AP-16.4Q)
 Apparent Cause
DOE failed to exercise sufficient management control over the procedure transition effort.

8. Action to Preclude Recurrence: (Address those actions necessary to prevent the identified cause from recurring)
Sufficient management control has now been exercised, as demonstrated by TDL No. 03-017 and PORB Position Paper 030409-01.

9. Due Date for Completion of Corrective Action:
Actions completed 4/19/03

10. Responsible Manager:
Mark E. Van Der Puy
Printed Name  Signature
4/24/03 Date

11. QAR Evaluation: Accept Partially Accept Reject
 Re-evaluated for significance

12. QAM Concurrence
 Signature
5/5/03 Date

DONALD J. HARRIS  Signature
4/28/03 Date
Printed Name

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 SWO

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CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

VERIFICATION AND CLOSURE OF DEFICIENCY REPORT (DR) ORD(O)-03-D-108

Block 5, Immediate Remedial Actions Completed

1. Verified Technical Direction Letter (TDL) Number 03-017, was issued on April 7, 2003. The TDL presents a more structured approach in implementing the Office of Civilian Radioactive Waste Management Improvement Initiatives Action Plan for Program Procedures.
2. Verified, a Project Operations Review Board (PORB) position paper (030409-01) has been accepted with comments and approved by the Deputy Director, Office of Repository Development. The position paper defines the process for implementing the requirements of the TDL.

Recommend closure of this DR. No further actions are required.

Donald J. Harris
Donald J. Harris, QAR

4/29/03
Date