



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

8 CAR NO.: YH-94-068  
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QA

**CORRECTIVE ACTION REQUEST**

1 Controlling Document OCRWM QARD, DOE/RW-0333P, Revision 01		2 Related Report No. YMP-94-01	
3 Responsible Organization M&O		4 Discussed With F. Tsai/J. Houseworth	
5 Requirement: QARD, Section 5.2 states: "Work shall be performed according to controlled implementing documents."			
6 Adverse Condition: There is no objective evidence that Waste Isolation Evaluation Comparing Drill and Blast with Mechanical Excavation Techniques, Document ID #EAB000000-01717-2200-00004, approved 3/9/94, was prepared, reviewed or approved in accordance with specified procedures.			
9 Does a Significant Condition Adverse to Quality exist? Yes ___ No <u>X</u> 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 <u>X</u> ; 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:			
7 Initiator Robert L. Howard <i>Robert Howard</i> 8/3/94		14 Issuance Approved by: QADD <i>Robert Howard</i> Date 8-5-94	
15 Response Accepted QAR <i>Robert Howard</i> Date 8/17/94		16 Response Accepted QADD <i>Robert Howard</i> Date 8-26-94	
17 Amended Response Accepted QAR _____ Date _____		18 Amended Response Accepted QADD _____ Date _____	
19 Corrective Actions Verified QAR _____ Date _____		20 Closure Approved by: QADD _____ Date _____	

*RECEIVED*

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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

1. Corrective Action Response for CAR YM-94-068

A. Remedial: Re-issue revised version compliant with existing QAP-3-5 procedures as a general technical report, not a Waste Isolation Evaluation (WIE). There was no request for a WIE on the topic of this document. It should not have been issued as a WIE.

B. Extent of Deficiency:

1. The deficiency is isolated to the document identified in the CAR. This document is the only WIE that has been prepared at the M&O Vienna office and was unusually long in its preparation in comparison with all other WIEs.
2. No other technical documents related to 2C have been found to be non-compliant with QAP-3-5.
3. Because the existing QAP-3-5 procedures were not followed, the adequacy of the document preparation and review are in question.
4. Training for the individuals signing the document were not up-to-date for the existing QAP-3-5.
5. This document was transmitted per QAP-3-12 to the Determination of Importance Group for inclusion in Design Package 2C and to the Local Records Center per QAP-17-1. There have been no other QA transmittals of this document.

C. Preclude Recurrence: Training, with emphasis on training maintenance. QAP-3-5 was revised, effective 3/11/94, and classroom training was provided. Classroom training will be verified for all Regulatory and Technical Evaluation Staff prior to assignment to prepare a technical document per QAP-3-5, and if missing, classroom training will be provided.

D. Root Cause Determination: This document had been prepared over a long period, having been initiated in 1991 and completed in February, 1994. The majority of the work on the document was complete by September 1993 when QAP-3-5 Rev. 02 was still in effect. The document preparation followed this procedure, which then went through two revisions and some procedure change notices between October, 1993 and February, 1994. We were deficient in checking the final document against existing procedures when issued.

2. Response Actions

Revise document according to applicable QAP-3-5 procedures, not as a WIE.

Responsible: Frank C. Tsai

Anticipated Completion: October 31, 1994 [Note: This revised document will not be included in the revised Design Package 2C, but the information contained this document that is needed for Package 2C will be included as part of the revised WIEs to be submitted in the revised design package.]

3. Response Approved:

  
Regulatory and Technical Evaluation Manager

Date: 8-16-94