



Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 98608
Las Vegas, NV 89193-8608

DEC 29 1994

Les E. Shephard
Technical Project Officer
for Yucca Mountain
Site Characterization Project
Sandia National Laboratories
P.O. Box 5800, Mail Stop 1333
Albuquerque, NM 87185

EVALUATION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST
(CAR) YM-94-087 RESULTING FROM YUCCA MOUNTAIN QUALITY
ASSURANCE DIVISION (YMQAD) AUDIT YMP-94-09 OF SANDIA NATIONAL
LABORATORIES (SCPB: N/A)

The YMQAD staff has evaluated the amended response to CAR
YM-94-087. The amended response has been determined to be
satisfactory. Verification of completion of the corrective
action will be performed after the effective date provided.
Any extension to this date must be requested in writing, with
appropriate justification, prior to the date. Please send a
copy of extension requests to Deborah Sult, YMQAD/QATSS,
101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109.

If you have any questions, please contact either Robert B.
Constable at (702) 794-7945 or Richard L. Maudlin at (702)
794-7290.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-1529

Enclosure:
CAR YM-94-087

cc w/encl:
J. H. Hines, OOD, AL
~~D. G. Spraul~~ NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
R. R. Richards, SNL, Albuquerque, NM, M/S 1333
M. C. Brady, SNL, 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

YMP-5

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9501120095

102.7
wm-11
M403

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WASHINGTON, D.C.**

8 CAR NO.: YM-94-087
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CORRECTIVE ACTION REQUEST

1 Controlling Document QAP 16-01, Revisions 1, 2 and 3, Corrective Action	2 Related Report No. YMP-94-09
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3 Responsible Organization SNL	4 Discussed With J. Voight/C. Jaramillo/D. Hawkinson
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5 Requirement:

A. Section 6.1, Step 2 states: SNL YMP QA shall determine if the deviation is a significant condition adverse to quality as defined in Subsection 3.8."

B. Section 6.2, Step 1 states in part: "Responsible Mgt PI/TL shall...identify proposed remedial actions...." (Note: Section 3.6 indicates remedial actions are to include a determination of impact on previously completed work and an investigation into the extent of the adverse condition.)

C. Section 6.4, Step 1 states in part: "...shall verify satisfactory completion of corrective actions and document objective evidence that was used to verify completion and effectiveness of those actions.... Verify all deviation remedial actions were completed as specified...."

6 Adverse Condition:
Contrary to the above, objective evidence (SNL CARs 93-23, 93-32, 93-36, 93-38, 94-11, 94-12, and 94-25) reviewed reveals that: (1) there was one case noted where determination of significance was not addressed, (2) in all but one case reviewed, remedial actions did not include a determination of impact on previously completed work and an investigation into the extent of the adverse condition, (3) in all but one instance, verifications of corrective action do not detail specific objective evidence that was used to verify completion and effectiveness of those actions, (4) in two instances CARs were closed without verification of completion of all corrective action.

9 Does a Significant Condition Adverse to Quality exist? Yes <u>x</u> No <u> </u> If Yes, Check One: <input checked="" 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 <u> </u> 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	13 Response Due Date: 20 Working Days From Issuance
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11 Required Actions: Remedial Extent of Deficiency Preclude Recurrence Root Cause Determination

12 Recommended Actions:

- For Item 1 in Block 6, evaluate CAR 93-36 for significance and document results (remedial only).
- For Item 2 in Block 6, the following is recommended:
 - Determine that extent of this deficiency.

7 Initiator Richard L. Maudlin <i>Maudlin</i> 09/08/94	14 Issuance Approved by: QADD <i>R. Spive</i> Date: 7/12/94
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15 Response Accepted QAR _____ Date _____	16 Response Accepted QADD _____ Date _____
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17 Amended Response Accepted QAR <i>Maudlin</i> Date 12/21/94	18 Amended Response Accepted QADD <i>R. Spive</i> Date 12/28/94
--	--

19 Corrective Actions Verified QAR _____ Date _____	20 Closure Approved by: QADD _____ Date _____
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13 Recommended Action(s) (continued)

- B. Identify the cause of the condition.
 - C. Determine what actions are necessary to preclude reoccurrence.
 - D. Identify the impact on quality due to not implementing this requirement.
3. For Item 3 in Block 6, the following is recommended: (see recommended actions for Item 2 above)
4. For SNL CARs 93-36 and 94-25 in Item 4 of Block 6, take the necessary action to complete verification of ALL items identified in the response to the CARs. Also, evaluate the extent of the identified condition and what actions will be taken to preclude reoccurrence.

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AMENDED RESPONSE

1. Corrective Action Response for CAR YM-94-087

A. Remedial Actions

CAR 93-23 The extent and impact of the deficiency were not documented in the remedial action statement. However, examination of the situation showed that all QAGRs were effected, but there was no impact because, regardless of the out-of-date status of the QAGR's, the personnel involved were actually working to the current procedures. The remedial action statement in CAR 93-23 has been revised to include an impact and extent statement and resubmitted to the LRC. Copy is attached.

CAR 93-32 The extent and impact of the deficiency were documented in the investigation done by Jim Voigt, page 5 of the CAR. The Objective Evidence has been corrected on the CAR and has been resubmitted to the LRC. Copy is attached. The verification was completed at the time of the CAR.

CAR 93-36 The significance has been documented and submitted to the LRC. Copy is attached. The extent of the deficiency was implied under "Actions to Prevent Recurrence". The responsible person stated that once remedial actions had taken place, "all files will be photocopied and dual storage maintained." The impact of the deficiency was indeterminate. The objective evidence was cited at the bottom of the CAR. The verification was based on the acceptance of a completed ITC surveillance and a completed and closed ITC CAR. ITC, at the time of the deviation and subsequent corrective action, had their own QA program, including an independent verification function. The contract then expired, precluding the possibility of a verification visit to the contractor. SNL QA accepted the documented evidence under those conditions. No further verification action is required or feasible.

CAR 93-38 The remedial action involved moving all samples and reviewing the activities in the core library. The responsible person described his evaluation of impact in his response and stated "sample integrity has not been compromised." This illustrates that impact and extent were addressed through those actions. The objective evidence was a statement of results of QA verification (examination of the storage area) documented on the CAR form. No remedial actions are required.

CAR 94-11 & 94-12 These CARs were written to track the corrective actions which resulted from a comprehensive screening done for CAR YM-93-97 to determine extent and impact. The remedial action while not stating the impact and extent are addressed under "Actions to Prevent Recurrence". The objective evidence was stated as the

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CAR YM-94-087

- A. Remedial Action: For the cited internal SNL YMP CARs, which are all closed, no specific remedial action will be taken, since the situations documented in the CARs have all been overtaken by time and events. Action to preclude recurrence, specified below, will be more significant in correcting this situation.
- B. Extent of the Deficiency: All SNL YMP CARs for FY 94 will be reviewed for evidence of the deficiencies cited in Block 6, above. (Responsible party: J. Voigt; Anticipated Completion Date: October 31, 1994)
- C. Root Cause Determination: The four cited discrepancies can be attributed to a lack of attention to detail on the part of QA personnel involved. Additionally, some of the personnel had not received enough guidance for them to be aware of the specifics that needed to be addressed.
- D. Actions to Preclude Recurrence: All QA personnel involved in CAR verification activities will receive refresher training that will specify each aspect of the corrective action process, so that these types of discrepancies will not occur in the future. (Responsible individual: J. C. Friend; Anticipated Completion Date: November 30, 1994)


for L. E. Shephard 10/12/94
SNL YMP Technical Project Officer

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revisions to the identified contracts. These amendments were verified. No further remedial actions required.

CAR 94-25 To address the numerous shortcomings in the content of, processing of, response to, follow-up of, and close-out of this CAR, another CAR (95-06) has been initiated. The new CAR includes the adverse conditions documented on CAR 94-25, plus additional, related adverse conditions that have been identified since CAR 94-25 was initiated (e.g., failure to apply remedial actions to all noncompliance cases, ineffectiveness of corrective actions, sign-off for closure of the CAR without verifying all actions as complete, etc.). This will cause the initial adverse conditions, as well as the additional conditions, to be resolved in a comprehensive, integrated, and adequate manner.

B. Extent of the Deficiency:

All SNL YMP CARs for FY94 have been reviewed for evidence of the deficiencies cited in Block 6, above. The matrix for the review is attached. An analysis of that review has revealed the following information with regard to the four items as cited in Block 6.

Item #1: *"determination of significance not given"* There were no further occurrences of the deficiency in CAR's 94-01 to 94-76. There is no further action required.

Item #2: *"remedial actions did not include a determination of impact on previously completed work and an investigation into the extent of the adverse condition"* The review showed there were 34 cases of statements that were unclear or not explicit, of statements that were misplaced on the form, or of actions that made the statements not applicable. Each of those cases were reviewed a second time to determine if the deficiency warranted further investigative action. In all of those cases, the issue had been addressed in another manner, by later investigative actions related to another CAR or because the evidenced CAR had been generated as a result of a comprehensive screening of a previous CAR. CAR's 94-67 to 94-76 all showed that the impact and extent statements were included in the remedial action response. This is due an increased awareness on the part of the QA staff. In addition, the review revealed one case, CAR 94-21, where there was no impact or extent statement and the statement was not covered by any later action. For this case, impact and extent will be determined by screening of procurement documentation for appropriate proposal evaluation planning and execution. A new SNL CAR will be written if other occurrences are discovered.

Item #3: *"verifications..do not detail specific objective evidence"* The review revealed that there were 11 cases of evidence not detailed, no statement of effectiveness, or

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objective evidence not apparent. Each case was reviewed a second time to determine if the deficiency warranted further verification. One case, CAR 94-08 required further actions on the part of SNL YMP QA. CAR 94-08 needed an additional statement to void an action listed in 12.3 (a). CAR 94-08 has been corrected to include required detail.

Item #4: "CARs were closed without verification" The review revealed that there were 11 cases of CARs closed without a complete verification. Each case was reviewed a second time to determine if the deficiency warranted further verification. In all cases but one, the verification had not been completed with relation to "Actions to Preclude Recurrence", showing a consistent problem in that area. That is, responses were accepted by SNL QA that were stated in such a manner there was not a specific point in time for verification, or the action was too broad to verify. In the other case, CAR 94-13 was missing statement of verification of training on Eaton. This was verified and the CAR was closed.

As a result of the comprehensive review, it was decided that, while there were multiple examples of the items cited Block 6, in most cases, when an in depth review was done of the CAR, the Corrective Action had been completed. The instances that required further documentation were quickly resolved. Based on this in depth review, it was not evident that a similar investigation of FY93 CAR's is warranted. Additionally, we are concerned with identifying and correcting problems in deviation-reporting/corrective-action-processing that currently exist. FY94 CARs provide a large enough sample to do so without highlighting problems that may have existed 1 1/2 to 2 years ago but that have not existed more recently or presently.

C. Root Cause Determination:

The two reviews of all of FY 94 CARs have revealed the following:

Personnel responsible for preparing responses to CARs were not enabled to prepare those responses with thorough, appropriate, and comprehensive content because they have not received sufficient guidance from SNL QA Staff in order to allow them to prepare responses containing adequate and verifiable content. Instructions for completing CARs were not always enclosed with the CAR when delivered, and the instructions that were provided were not entirely clear.

There was not a consistent "quality control" mechanism in place for the review of the CAR for adequacy of the response or during verification for closure to assure that all actions were verified and that a consistent level of documentation was obtained as objective evidence.

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D. Actions to Preclude Recurrence:

To address the root cause concerning preparation of adequate CAR responses, an improved set of instructions focused on the content of CAR responses will be developed, for distribution with newly-initiated CARs. (The objective evidence for completion of this action will consist of a copy of the new instructions.)

To address the root cause concerning less-than-effective CAR-response review and verification actions by QA staff, a "CAR Checklist for QA" will be developed, and its use will be required for SNL YMP QA staff.

2. Responsible Individuals and Anticipated Completion Dates:

Remedial actions are all complete.

Investigation to determine extent of deficiency - These actions have all been completed except for the investigation of extent and impact for the situation exemplified by CAR 94-21, as specified in B, Item#2, above: Responsible Person: D. Hawkinson.
Anticipated Completion Date: 01/27/95.

Actions to preclude recurrence - Responsible Person: R. R. Richards. Anticipated completion date: 01/20/95

 12/2/94
L. E. Shephard

Car No: 93-23
Amendment #1

12.1 Remedial Action (Amended)

In order to not redo QAGRs once task split is completed, best approach will be to create draft QAGR's for each of the new subelements once they become effective. All QAGRs were effected, but there was no impact to the quality of the work because the personnel involved were working to the current procedures.

C. Jaramila
12/01/94

93/1.2.5.4.6/IMP/1.3/CAR 93-23/GA
YMPCRF

CAR was reviewed 12/01/94
revised 12/01/94
Amendment #3

need 0820/93 on QA E. S 08/20/93
need 08/24/93 updated 08/27/93
need 08/30/93 updated 08/31/93 BFL

updated 09/09/93 BFL
Closed 9/17/93 BFL

SNL
YMP

CORRECTIVE ACTION REQUEST

9/17/93
BFL

- 1. CAR No.: 93-32 Date: 7/16/93 Page 1 of 28
- 2. Initiator and Organization: E. K. Webb, SNL 6331 Audit Team WBS No.: 12546
- 3. Responsible Organization-SNL: 6115 or Contractor: _____
- 4. Discussed With: V. Tidwell Organization: SNL-6115
- 5. Work Stoppage: No Yes
- 6. Related Report No. SNL-A93-1
- 7. Identified During: Audit Trend Mgmt. Assess. Surveillance Other _____
- 8. Requirement (Reference Documents):
QAIP 11-2 Requirements for Experiment and Equipment-Test Logbooks (precursor to 20-2)
- 9. Deviation or Observation (Describe in Detail):
Technical reviews are required for Scientific Notebooks after removal of exemption for Level 3 experiments (7/30/92).
- 10. Significant Condition Adverse to Quality? (SCAQ) No Yes (Notify SNL YMP TPO if Yes)
SNL YMP QA Sign/Date: J. Davis 8/12/93
- 11. Management Responsible for Developing Response V. Tidwell Response Due Date: 8/27/93
P. Davies JLF 8/12/93 20 working days

12. Proposed Corrective Actions

- 12.1 Root Cause (Mandatory for Significant Conditions and CARs from Audits)
See page 2
- 12.2 Remedial Actions (Mandatory for All Deviations)
See page 2
- 12.3 Actions to Prevent Recurrence (Mandatory for Significant Conditions and CARs from Audits)
See page 2
- 12.4 Estimated Corrective Action Completion Date:
See page 2
- 12.5 Responsible Management Sign/Date: Vincent C. Gedwell 8/26/93
- 12.6 Department Manager or Delegated Authority (For External CARs)
Sign/Date: N/A
- 12.7 SNL YMP QA Concurrence With Proposed Corrective Actions (Mandatory for All Deviations. Optional for Observations) SNL YMP QA Sign/Date: JLF 8/17/93

13. Corrective Action Completion
Responsible Management Sign/Date: P. A. Davis 8/30/93

14. Verification of Corrective Action Implementation. Include or Reference Documented Objective Evidence.
SNL YMP QA Sign/Date: JLF 8/13/93

FORM 16-1.1/1-2(7/30/92)

File Code: 94/1.2.5.4.6/UBR 11.4/ SNL A93-1/ QA
93/1.2.5.4.6/ YMP 11.3/ CARs - 1.0.1 9/17/93
revised source (08/27) by m. d. d. l.
training verified as complete - see 12.3 12/01/94

Amendment #

Sandia National Laboratories

Albuquerque, New Mexico 87185

date: August 27, 1993

to: DRMS Staff

from: 
R. J. Glass, 6115

Subject: Addendum to the log book for the Gravity-Driven Instability in a Partially Wetted Fracture Experiment

Please add the enclosed signature page into the log book for the Gravity-Driven Instability in a Partially Wetted Fracture Experiment (L19-1/15/90 data set, activity 2: Unsaturated Fracture Flow)

MJNicholl:6115:mn

Copy to: (w/o enc.)
6115 P.B. Davies
6115 V.C. Tidwell
6115 R.J. Glass -
6115 M.J. Nicholl -
6115 H.A. Nguyen.-
6302 L.E. Shephard
6302 51/L19-01/15/90 (w/encs.)

93/1.2.5.4.6/IMP/1.3/CAR 93-32/QA

Amendment # 1

Corrected Page # 1 of CAR 94-~~100~~

CORRECTIVE ACTION REQUEST

12/01/94



- 1. CAR No.: 93-36 Date: 7/15/93 Page 1 of 25 ^{11/1/93}
- 2. Initiator and Organization: D. Hawkinson/6319 WBS No.: 1.2.4.6.1
- 3. Responsible Organization-SNL: 6115 or Contractor: _____
- 4. Discussed With: J. Case/B. Koehler Organization: ITC
- 5. Work Stoppage: No Yes
- 6. Related Report No. Audit Report ITC-A93-1
- 7. Identified During: Audit Trend Mgmt Assess. Surveillance Other _____
- 8. Requirement (Reference Documents):
See Page 2.
- 9. Deviation or Observation (Describe in Detail):
See Page 2.
- 10. Significant Condition Adverse to Quality? (SCAQ) No Yes (Notify SNL YMP TPO if Yes)
SNL YMP QA Sign/Date: David R. Hawkinson 8/3/93 ^{12/01/94}
- 11. Management Responsible for Developing Response J. Case, ITC Response Due Date: 8/6/93

12. Proposed Corrective Actions

- 12.1 Root Cause (Mandatory for Significant Conditions and CARs from Audits)
Duplicate files have not been maintained nor has a one-hour fire rated container/facility been purchased.
- 12.2 Remedial Actions (Mandatory for All Deviations) (To be used for nonconforming sample disposition(s))
A request has been made to SNL to purchase a one-hour fire rated container for all project files.
- 12.3 Actions to Prevent Recurrence (Mandatory for Significant Conditions and CARs from Audits)
All project files will be kept in the one-hour fire rated container after it is received. If the request for the container is not approved, then all files will be photocopied and a dual storage system will be maintained.
- 12.4 Estimated Corrective Action Completion Date:
9/30/93
- 12.5 Responsible Management Sign/Date: John R. Case 8/15/93
- 12.6 Department Manager or Delegated Authority (For External CARs)
Sign/Date: Roy L. Fairley 8/24/93
- 12.7 SNL YMP QA Concurrence With Proposed Corrective Actions (Mandatory for All Deviations. Optional for Observations) SNL YMP QA Sign/Date: David R. Hawkinson 9/3/93

13. Corrective Action Completion

Responsible Management Sign/Date: Lauren A. White 10/23/93

14. Verification of Corrective Action Implementation. Include or Reference Documented Objective Evidence.

SNL YMP QA Sign/Date: David R. Hawkinson 11/1/93
Closed Based on Attached ITC QA Surveillance & ITC Corrective Action

16-1.1/1-2(5/04/92)

File Code:

PRIMARY FILE: 93/1.2.4.6.1/IMP/1.3/93-36/QA
YMP CRF

Amendment #2

SIGNATURE PAGE

The experiments described in this log book were designed by Michael J. Nicholl.

Physical experimentation was performed by Michael J. Nicholl.

Data analysis was performed by Michael J. Nicholl.

Review of the log books was conducted by Robert J. Glass.

I have reviewed these log books to ascertain that the work is consistent with the applicable YMP QA requirements:

Signature: RJ Glass Date: 8/27/93

93/1.2 5.46/IMP/1.3/CAR 93-32/QA

SNL
YMP

CORRECTIVE ACTION REQUEST

- 1. CAR No.: 94-21 Date: 5/24/94 Page 1 of 2
- 2. Initiator and Organization: R. R. Richards, 6319 WBS No.: 1.2.3.2.7.1.4
- 3. Responsible Organization-SNL: 6313 or Contractor: _____
- 4. Discussed With: Ron Price 5/26/94 Organization: _____
- 5. Work Stoppage: No Yes
- 6. Related Report No. N/A
- 7. Identified During: Audit Trend Mgmt. Assess. Surveillance Other _____
- 8. Requirement (Reference Documents): a) QAIP 4-1, Procurement, para. 4.3.2, step 5, item 10, states that, for a Request for Quotations, the Proposal Evaluation Plan "shall provide for inclusion of one or more QA personnel for evaluation of proposals for quality-affecting procurements." (continued on page 2)
- 9. Deviation or Observation (Describe in Detail):
 - a) The proposal evaluation plan in RFQ AI-3890 does not include QA personnel.
 - b) The proposal evaluation that was performed for RFQ AI-3890 did not include QA personnel in the evaluation team.
- 10. Significant Condition Adverse to Quality? (SCAQ) No Yes (Notify SNL YMP TPO if Yes)
SNL YMP QA Sign/Date: [Signature] 5/25/94
- 11. Management Responsible for Developing Response L. S. Costin Response Due Date: 3 Jun 94
(R. Price)

- 12. Proposed Corrective Actions (12.1 and 12.3 not required for Observation. Use 12.2 to respond to Observations.)
 - 12.1 Root Cause (Mandatory for Significant Conditions and CARs from Audits)
IN THE INITIAL STAGES OF THE PROCESSING OF THE PR IN QUESTION, THE PI INCLUDED A QA STAFF PERSON IN THE EVALUATION PLAN. HOWEVER, SOMEWHERE DURING THE PREPARATION OF DOCUMENTS AND THE SENDING OUT OF THE RFQ, THE QA STAFF REFERENCE WAS DELETED. AS A RESULT, THE PI FAILED TO INCLUDE QA STAFF IN THE INITIAL TECHNICAL EVALUATION.
 - 12.2 Remedial Actions (Mandatory for All Deviations) (To be used for nonconforming sample disposition(s))
A QA EVALUATION WILL BE DONE AND THE RESULTS INCORPORATED INTO THE TECHNICAL EVALUATION. THE REVISED TECHNICAL EVALUATION WILL BE SUBMITTED TO THE SANDIA CONTRACTING REPRESENTATIVE.
 - 12.3 Actions to Prevent Recurrence (Mandatory for Significant Conditions and CARs from Audits)
A STEP HAS BEEN ADDED TO THE QA CHECKLIST FOR REVIEWING PRS TO ENSURE LARGE CONTRACT PRS WILL INCLUDE A QA EVALUATION OF PROPOSALS.
- 12.4 Estimated Corrective Action Completion Date: 10 JUN 94
- 12.5 Responsible Management Sign/Date: Ronald H Price 3 JUN 94
- 12.6 Department Manager or Delegated Authority (For External CARs)
Sign/Date: N/A
- 12.7 SNL YMP QA Concurrence With Proposed Corrective Actions (Mandatory for All Deviations. Optional for Observations) SNL YMP QA Sign/Date: [Signature] 6/3/94
- 13. Corrective Action Completion
Responsible Management Sign/Date: Ronald H Price 7/1/94
- 14. Verification of Corrective Action Implementation. Include or Reference Documented Objective Evidence.
SNL YMP QA Sign/Date: [Signature] 7/1/94
Reviewed the completed technical proposal (attached) and the revised checklist.

1/1-2(11/04/93)

NWF

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WBS
7
12/02/94

SNL
YMP

CORRECTIVE ACTION REQUEST
Continuation Sheet

CAR No.: 94-21

Page 2 of 2

8. Requirement (continued)

b) QAIP 4-1, para. 4.3.6, step 12 states, concerning conduct of proposal evaluation, "This evaluation shall be performed by designated, technically qualified organizations including the quality assurance organization."

NY
-1.1/2-2(1/1/92)

File Code:

SNL
YMP

CORRECTIVE ACTION REQUEST

2nd 1/17/94

- 1. CAR No.: 94-08 Date: 12/17/93 Page 1 of 34
- 2. Initiator and Organization: D. Hawkinson/6319 WBS No.: 1.2.3.11.3.1
- 3. Responsible Organization-SNL: 6352 or Contractor: _____
- 4. Discussed With: Stan Edmund Organization: SNL 6352
- 5. Work Stoppage: No Yes
- 6. Related Report No. HOLO-E93-1
- 7. Identified During: Audit Trend Mgmt. Assess. Surveillance Other _____
- 8. Requirement (Reference Documents):
See Page 2
- 9. Deviation or Observation (Describe in Detail):
See Page 2 and Page 3, YMP Database Snapshot - John Goodrow
- 10. Significant Condition Adverse to Quality? (SCAQ) No Yes (Notify SNL YMP TPO if Yes)
SNL YMP QA Sign/Date: David R Hawkinson 12/23/93
- 11. Management Responsible for Developing Response: F. Check-Martin Response Due Date: 1/7/94

12. Proposed Corrective Actions (12.1 and 12.3 not required for Observation. Use 12.2 to respond to Observations.)

- 12.1 Root Cause (Mandatory for Significant Conditions and CARs from Audits)
See Page 4.
- 12.2 Remedial Actions (Mandatory for All Deviations) [To be used for Nonconforming Sample Disposition(s)]
See Page 4.
- 12.3 Actions to Prevent Recurrence (Mandatory for Significant Conditions and CARs from Audits)
See Page 4.
- 12.4 Estimated Corrective Action Completion Date:
January 7, 1994.
- 12.5 Responsible Management Sign/Date: JE Shapton 1/10/94
- 12.6 Department Manager or Delegated Authority (For External CARs)
Sign/Date: N/A
- 12.7 SNL YMP QA Concurrence With Proposed Corrective Actions (Mandatory for All Deviations. Optional for Observations) SNL YMP QA Sign/Date: David R Hawkinson 1/10/94

13. Corrective Action Completion
Responsible Management Sign/Date: N/A

14. Verification of Corrective Action Implementation. Include or Reference Documented Objective Evidence.
SNL YMP QA Sign/Date: David R Hawkinson 1/12/94

CLOSED BASED ON ATTACHED TRAINING SNAPSHOT of 1/11/94

NYF 16-1.11-2(110493)

File Code:

Primary File 93/124.2.1/IMP/1.3/94-08/QA
VUD CPE X-COPY

SNL
YMP

CORRECTIVE ACTION REQUEST Continuation Sheet

CAR NO.: 94-08

Page 2 of ^{DOT} ~~3~~ 6 ^{1/2/94}

Block 8: REQUIREMENT

CAIP 2-5, Section 5.5, "Delinquent Training Assignments" provides for (1) the Training Manager to notify the TPO or appropriate SNL YMP Manager of delinquent training; and (2) for the TPO/SNL YMP Manager to take appropriate action to correct delinquent training assignments.

Block 9: DEVIATION

No "Delinquent Training" action was available at the time of this QA Annual Evaluation of Holometrix, Inc., for Holometrix employee, John Goodrow, whose SNL YMP Training Snapshot as of 12/15/93 showed fifty-six (56) days overdue on thirty-three (33) of his assigned SNL procedures to be trained on.

- John Goodrow training status was first checked on 10/8/93, at which time the record showed ten (1) overdue days on thirty-five (35) assigned procedures. This overdue training had further accrued to fifty-six (56) day overdue with no apparent action being taken.

Note: Since John Goodrow is a contractor employee, the only delinquent notice notification goes to the person and no notice was copied to the Holometrix Contract Monitor. The SNL Training System failed to flag this problem and could have coordinated a realistic "TARGET DATE" with the SNL PI that would have been consistent with Holometrix scheduled use of John Goodrow on YMP work after January 1, 1994.

NW 16-1-1/1-2(11/04/93)

File Code:

Amendment #2

Sandia National Laboratories
SNL NWMP TRAINING
Dept. 6352, M/S 1330
Albuquerque, NM 87185-1330

TRAINING SNAPSHOT

*** EATON, ROGER R. *** SNL 1513 M/S 0835

YMP

Last Certified 06/24/91

TYPE	NUM	REV	ICN#	TITLE	TARGET DATE	COMPLETE DATE	OVER DUE	PROJ	STAT
MANUAL				YMP ORIENTATION	11/21/94		9		A
MANUAL				GUIDEBOOK FOR INTERACTIONS BETWEEN DOE AND NRC	05/31/94	05/06/94			A
MANUAL				YMP Orientation		01/09/89			A
VIDEO				PACS AND 10,000 YEAR TEST		11/14/86			A
QAIP	01-03	04		Stop Work Orders	09/23/94	09/06/94		YMP	A
QAIP	01-04	00		Resolution of Quality Assurance Disputes	09/29/94	09/06/94		YMP	A
QAIP	02-04	02		Conducting and Documenting Analyses and Calculations	11/16/94		12	YMP	A
QAIP	06-01	02		Document Control System	10/28/94	09/28/94		YMP	A
QAIP	06-02	03		Preparing, Reviewing, Approving, & Issuing Technical Informa	10/16/94	10/06/94		YMP	A
QAIP	06-03	02		Conducting and Documenting Reviews of Documents	10/26/94	09/26/94		YMP	A
QAIP	16-01	04		Corrective Action	10/28/94	09/28/94		YMP	A
QAIP	17-01	02		Protecting, Preparing, and Submitting YMP QA Records	10/26/94	10/20/94		YMP	A
QAIP	19-01	01		Software Quality Assurance Requirements	06/17/94	06/01/94		YMP	A
WA	-0135	00		Flow in Discrete Fractures Performance-Assessment-Process-Le	11/11/94			YMP	A

Kevin -
This snapshot
has to be submitted
as a record;
because it
represents a pt.
in time.

95.02 1/3/94

B. Extent of the Deficiency: SNL CARs NO. 94-01 through 94-20 were examined in an effort to determine the extent of the deficiencies identified in the subject YMP CAR. The four major areas examined included:

- 1) Is determination of significance documented as being assessed?
- 2a) Does remedial action include a determination of impact on previously completed work?
- 2b) Does remedial action include an investigation into the extent of the adverse condition?
- 3) Were details on specific objective evidence used to verify completion and effectiveness of those actions adequately documented?
- 4) Does it appear that all corrective actions were verified as complete?

When a CAR was designated as an "Observation" the above "Adverse Condition" criteria were not assessed.

CAR NO.	1	2a	2b	3	4	COMMENTS
94-01	Y	Y	Y*	Y	Y	* Applied only to CIL, no other WAs investigated
94-02						OBSERVATION
94-03	Y	N*	Y	N†	N†	* Performed as part of Actions to Prevent Recurrence. † No evidence procedures brought to current status.
94-04						OBSERVATION
94-05						OBSERVATION
94-06						OBSERVATION
94-07	Y	N*	Y	Y	Y	* Result from Comprehensive screening on CAR YM-93-098. 02/10/94
94-08	Y	APR documents as 1-time occurrence		N	N*	* start work date not added to Training assignment form. See CAR 94-31 to include recurrence. 12/10/94
→ 94-09	Y	N*	N	Y	Y	* No statement on impact or actions to determine extent - Remedial action required writing CAR 94-10.
94-10	Y	Y	Not defined	Y	Y	94-10 did include impact - voided 12/10/94
94-11	Y	N*	N	Y	Y	Deferred verification of actions as YMP CAR YM-93-097. 12/10/94
94-12	Y	N*	N	Y*	Y*	* Deferred verification of some actions to YMP CAR YM-93-097. 12/10/94
94-13	Y	Y	Not defined	N	N	No training verification on Eaton - Completed 12/02/94.
94-14	Y	N*	N	Y	Y	* Investigation of training records - See CAR 94-31 12/10/94
94-15	Y	N*	N	Y	Y	Contracts were canceled to close - No actions required
94-16	Y	N	N	Y	Y	
94-17	Y	N	N	Y	Y	
94-18	Y	N*	N	Y	Y	Remedial action included a Comprehensive Examination of CAR PROCESS SUBJECT EXTENT N/A. 02/12/94
94-19	Y	Y	Y	Y	N	Submital of records not verified only plan schedule complete 6/95
94-20						VOIDED

g.v. Wright 10/31/94

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CAR NO.	1	2a	2b	3	4	COMMENTS
94-21	Y	N	N	Y	Y	
94-22	Y	Y	N	NA	NA	
94-23						OBSERVATION
94-24	Y	N**	N**	N*	Y	* Effectiveness not checked ** IMPACT & EXTENT WILL BE ADDRESSED IN YMP CAR 94-94-019.
94-25	Y	N*	N**	Y	Y	* CAR REOPENED 12/16/94
94-26	Y	N*	N*	N*	N*	* ISOLATED INCIDENCE - CLARIFY TPP - No deficiency DOCUMENTED EVIDENCE ATTACHED
94-27	Y	NA	NA	NA	Y	Clarify procedure no deficiency
94-28	Y	NA	NA	NA	Y	Clarify procedure no deficiency
94-29	Y	N*	N*	N*	N*	Procedure REVISED; WA's revised ALL WA'S AFFECTED REVISED, 12/16/94.
94-30	Y	Y	Y	N+	N+	Investigative action results not defined. CLOSED BASED ON Remedial Action
94-31	Y	N*	Y	N*	Y*	* Random spot check * COMPREHENSIVE REVIEW PART OF ACTION. OCCURRENCES CORRECTED AS FOUND
94-32	Y	N*	N*	Y	Y	* CAR RESULTED FROM MISUNDERSTANDING
94-33	Y	N*	N*	Y	N	Training Assignment form was incomplete 94-31 did screening & corrected services
94-34	Y	Y	Y	Y	Y	
94-35	Y	N*	N*	Y	Y	CAR 94-31 SCREENED ALL TRAINING RECORDS
94-36						OBSERVATION
94-37	Y	NA	NA	NA	NA	Work still in process no deficiency
94-38						OBSERVATION
94-39						OBSERVATION
94-40						CANCELED

10 5 0 giv/sect 10/31/94

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CAR NO.	1	2a	2b	3	4	COMMENTS
94-41	Y	N*	NA	Y	Y	* NO IMPACT - references in procedure only - Current Procedures have been distributed. 12/01/94
94-42						OBSERVATION
94-43	Y	N*	Y	Y	Y	* INDETERMINATE. 06/10/94
94-44						OBSERVATION
94-45	Y	N*	Y	N	N	NO IMPACT - ALL WORK WAS CONDUCTED ACCORDING TO CURRENT PROCEDURES. 12/01/94
94-46						OBSERVATION
94-47	Y	N*	N*	Y	Y	IMPACT & EXTENT WILL BE ADDRESSED IN RESPONSE TO CAR 94-95-04 & YM-95-05. 08/12/01/94
94-48	Y	NA	NA	Y	Y	Revise 12-1 to delete obsolete requirements
94-49						OBSERVATION
94-50	Y	N*	Y	N	N	NO IMPACT - ALL WORK WAS CONDUCTED ACCORDING TO CURRENT PROCEDURES. 12/01/94
94-51	Y	N*	N*	N	N	* Not discussed but not necessary
94-52	Y	Y	N*	Y	Y	* WILL BE ADDRESSED IN CAR YM-94-079 08/12/01/94
94-53						OBSERVATION
94-54	Y	Y	Y	Y	Y	
94-55	Y	N*	N*	Y	Y	* RESULTED FROM AUDIT OF MTS RECORDS. No other instances. No impact on quality.
94-56	Y	N*	N*	Y	Y	
94-57	Y	N*	Y	Y	Y	Not discussed but not necessary
94-58	Y	Y	NA	Y	Y	
94-59						VOIDED
94-60						Cancelled

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g.v. 10/31/94

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CAR NO.	1	2a	2b	3	4	COMMENTS
94-61	Y	N*	N*	Y	Y	* Probably not relevant
94-62	Y	N*	N*	Y	Y	} NO ACTION TAKEN <i>of 12/01/94</i>
94-63	Y	N*	N*	Y	Y	
94-64	Y	N*	N*	Y	Y	
94-65	Y	N	N	*	*	
94-66	Y					OBSERVATION
94-67	Y	Y	Y	Y	Y	
94-68	Y	Y	Y	Y	Y	
94-69	Y					OBSERVATION
94-70	Y	Y	Y	Y	Y	
94-71	Y	Y	Y	+	*	* Corrective Action in process
94-72	Y	Y	Y	*	*	* Corrective Action verification in process
94-73	Y	+	*			Response in process
94-74						Cancelled
94-75						Cancelled
94-76	Y					Response in process
95-01						VOIDED
95-02						To Be Written

ju/Verst 10/31/94