



**Department of Energy**  
 Office of Civilian Radioactive Waste Management  
 Yucca Mountain Site Characterization Office  
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 Las Vegas, NV 89193-8608

QA: L

OCT 20 1994

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 for Yucca Mountain  
 Site Characterization Project  
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 Albuquerque, NM 87185

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR)  
 YM-94-088 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 response to CAR YM-94-088. The response has been determined to be unsatisfactory because Work Agreements need to be identified whether they are upper or lower tier and they need to reference each other when there is more than one tier. The difference in the treatment, processing, and use between upper and lower tier Work Agreements need to be clearly identified.

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 (702) 794-7945 or Kenneth T. McFall at (702) 794-7280.

*Robert B. Constable for*

Richard E. Spence, Director  
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-380

Enclosure:  
 CAR YM-94-088

*102.7  
 Wm-11  
 RBC*

Les E. Shephard

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OCT 20 1994

cc w/encl:

J. H. Hines, OOD, AL

~~J. G. Spraul, NRC, Washington, DC~~

S. W. Zimmerman, NWPO, Carson City, NV

R. R. Richards, SNL, Albuquerque, NM, M/S 1333

J. F. Schelling, SNL, Las Vegas, NV

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV

D. G. Sult, YMQAD/QATSS, Las Vegas, NV

250008

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

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**CORRECTIVE ACTION REQUEST**

1 Controlling Document QAIP 01-05, Revision 07		2 Related Report No. YMP-94-09	
3 Responsible Organization SNL		4 Discussed With R. Richards	
5 Requirement: QARD DOE/RW-0333P, Revision 0, Section 5.2.2, A through I, specifies the "Content of Implementing Documents." SNL QAIP 01-05, Revision 07, Section 4.1 states in part that if Work Agreements (WAs) govern scientific investigation work, then the WA needs to reference Technical Procedures (TPs) that address elements a. through k., or if a scientific notebook is used without TPs, then elements a. through k. need to be addressed in the WA.			
6 Adverse Condition: Contrary to the above requirements, WAs are not referencing TPs or if the Scientific Notebook method is used, the WAs are not addressing the required Section 4.1, Step 1, Note 2, No. 2, a. through k. elements. A review of the WAs produced numerous examples of the deficient condition.  Some examples of this condition include: WA-0040, WA-0131, and WA-0095, -0096 and -0097.			
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	
13 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 type="checkbox"/> Root Cause Determination			
12 Recommended Actions:			
7 Initiator James George <i>Kenneth McFall for</i> 9/8/94		14 Issuance Approved by: QADD <i>[Signature]</i> for Date <u>9-12-94</u>	
15 Response Accepted QAR _____ Date _____		16 Response Accepted QADD _____ Date _____	
17 Amended Response Accepted QAR _____ Date _____		18 Amended Response Accepted QADD _____ Date _____	
19 Corrective Actions Verified QAR _____ Date _____		20 Closure Approved by: QADD _____ Date _____	

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WASHINGTON, D.C.

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**CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)**

A. Remedial Action: None, as explained below.

Work Agreement

Individual Responsible for Revising WA

WA-0040

N/A - this is an upper-tier WA, not a WA that governs the specific conduct of scientific investigation.

WA-0131

N/A - this is an upper-tier WA, not a WA that governs the specific conduct of scientific investigation.

WA-0095

No scientific investigation activities involving scientific notebooks was ever performed under this WA and the need for the support called for by the WA has ended. The WA has been closed.

WA-0096

N/A - this is a WA that directs calculational analysis, not scientific investigation.

WA-0097

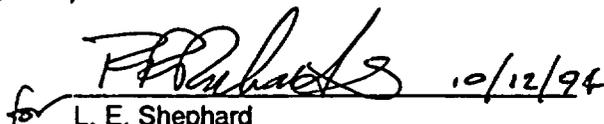
N/A - this is a WA that governs development and validation of a computer program, not scientific investigation.

B. Extent of the Deficiency: Although, of the 5 WAs cited as examples, only one (WA-0095) suffered from the stated deficiency, all currently active lower-tier WAs will be screened to determine if they: a) govern the conduct of scientific investigation activities, and b) do not cite related TPs and do not address "elements 'a' through 'k'" from QAIP 1-5. If additional instances of the cited deficiency are found, SNL YMP CARs will be generated to initiate action to remedy the condition. (Responsible Individual: D. R. Hawkinson; Anticipated Completion Date: November 4, 1994)

C. Not required.

D. Action to Preclude Recurrence:

1. QAIP 1-5 will be revised to clearly indicate that the cited requirements apply to lower-tier, detailed, work-activity-instruction Work Agreements, rather than upper-tier WAs. (Responsible Party: J. C. Friend; Anticipated Due Date: November 15, 1994, for revision approval)
2. If the results of the investigative action in B, above, indicates no additional occurrences of the deficiency, no other actions will be taken. If any additional occurrences are discovered, information that clarifies and emphasizes the cited requirement will be disseminated to all YMP scientific investigation Task Leaders by means of a "Quality Assurance Advisory." (Responsible Individual: R. R. Richards; Anticipated Completion Date: November 18, 1994 [if any action needed]).
3. A standard checklist for QA review of Work Agreements, which includes criteria based on the cited requirements, will be developed. (Responsible Individual: J. V. Voigt; Anticipated Completion Date: October 31, 1994)

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