



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

**JAN 18 1995**

Donald G. Horton, Director, Office of Quality Assurance,  
(RW-3) NV  
ATTN: Robert W. Clark, HQ (RW-3.1) FORS

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF CORRECTIVE  
ACTION REQUEST (CAR) YM-94-060 RESULTING FROM YUCCA MOUNTAIN  
QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-94-07 OF  
U.S. DEPARTMENT OF ENERGY/HEADQUARTERS' QUALITY ASSURANCE  
DIVISION (SCPB: N/A)

The YMQAD staff has verified the corrective action to CAR  
YM-94-060 and determined the results to be satisfactory.  
As a result, the CAR is considered closed.

If you have any questions, please contact either Robert B.  
Constable at 794-7945 or Charles C. Warren at 794-7248.

*Robert B. Constable*

YMQAD:RBC-1743

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

Enclosure:  
CAR YM-94-060

cc w/encl:

D. A. Dreyfus, HQ (RW-1) FORS

L. W. Barrett, HQ (RW-2) FORS

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

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

T. L. Badredine, M&O/TRW, Las Vegas, NV

cc w/o encl:

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

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

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

8 CAR NO.: YH-94-060  
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**CORRECTIVE ACTION REQUEST**

1 Controlling Document QAAP-2.2, Revision 1, Verification of Personnel Qualifications		2 Related Report No. OCRWM QA Audit YMP-94-07	
3 Responsible Organization RW-3.1		4 Discussed With R. Clark/L. Wagner	
5 Requirement: QAAP-2.2, Revision 1 states:  (1) Paragraph 6.1.1 - "Supervisors shall develop position descriptions for those employees who perform under their direct supervision, activities subject to QA Program control." (Continued on next page)			
6 Adverse Condition:  Contrary to the above requirements, a review of records for three QATSS personnel revealed the following: (1) No objective evidence of documented position descriptions, (2) No objective evidence of statements of qualifications for positions being held, (3) No objective evidence that a copy of the completed PQS with supporting documentation has been transmitted to the appropriate administrative support personnel as evidenced by the signed transmittal sheet at the HQ QATSS office, (4) Records at the QRC are incomplete, and (5) The working files at the HQ QATSS office are incomplete.			
9 Does a Significant Condition Adverse to Quality exist? Yes <u>No</u> <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> 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 <u>No</u> <input checked="" type="checkbox"/> ; 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: 1) Perform an investigation to determine extent of deficiencies. 2) Correct all deficiencies cited and any other deficiencies found during the investigation to determine the extent of the deficiency. (Continued on next page)			
7 Initiator Raul A. Rinojosa <i>JE Rodgers for</i> 9/28/94		14 Issuance Approved by: QADD <i>R. Montalvo</i> for Date 7.29.94	
15 Response Accepted QAR <i>Raul A. Rinojosa</i> Date 9/1/94		16 Response Accepted QADD <i>R. Montalvo</i> for Date 9.2.94	
17 Amended Response Accepted QAR Date		18 Amended Response Accepted QADD Date	
19 Corrective Actions Verified QAR <i>C.C. Wagner</i> for Date 1-12-95 <i>R.A. Rinojosa</i>		20 Closure Approved by: QADD <i>R. Montalvo</i> for Date 1.17.95	

ENCLOSURE

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**CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)**

**5 Requirements (continued)**

- (2) Paragraph 6.2.2 - "The supervisor shall complete the Position Qualification Statement (Attachment 2) (PQS) and attach objective evidence of verification, such as statements from colleges, and signed and dated telephone conversation records that support the stated education and experience."
- (3) Paragraph 6.3.1 - "The supervisor shall transmit a copy of the completed PQS with supporting documentation to the appropriate administrative support personnel...to complete the hiring process."
- (4) Paragraph 6.3.2 - "Upon completion of the hiring process, the supervisor shall transmit the completed PQS with supporting documentation directly to the Quality Records Center (QRC) in accordance with QAAP-17.1, QA RECORDS MANAGEMENT."
- (5) Paragraph 6.3.3 - "The supervisor shall also retain a copy as the office working file...."

**13 Recommended Action(s) (continued)**

- 3) Determine the root cause and install or reinforce existing controls to prevent recurrence.

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**CORRECTIVE ACTION REQUEST (Continuation Page)**

Corrective Action for CAR #YM-94-060

**A. Remedial Action**

The records of the three QATSS personnel will be completed by adding the position description, adding the PQS, adding documentation that shows the documents are with the appropriate administrative support personnel, submitting missing QA Records to the QRC, and ensuring the QATSS personnel qualification working files contain the necessary documentation..

Responsible person: Lester Wagner  
Completion date: September 15, 1994

**B. Extent of the Deficiency**

QATSS will review all HQ QATSS personnel qualification working files and QRC files for related deficiencies. A compilation of actions taken will be available for the record at the time of verification closure of this CAR.

Responsible Person: Lester Wagner  
Completion Date: December 31, 1994

**C. Root Cause Determination**

The root cause has been determined to be that the responsible supervisor believed that the training area was being effectively handled when he assumed the supervisory role. The supervisor also was not properly trained in procedure QAAP-2.2, "Verification of Personnel Qualifications". In addition, loss of records management personnel and realignment of the records management job functions caused for lack of continuity in the formal control of initial personnel qualifications documentation.

**D. Corrective Action to Preclude Recurrence**

A Technical Assistant has been designated as responsible for maintaining the personnel qualification working files and forwarding records to the QRC. This assignment along with training the supervisor in HLP 2.1Q will provide the knowledge to preclude recurrence.

Responsible Person: Lester Wagner  
Completion Date: August 31, 1994

R. W. Clark  
R. W. Clark

8/19/94  
Date

8/22/94 LTR. CLARK TO SULT

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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

Verification of completion of Corrective Action:

A. Remedial Action:

Records for the 3 individuals (Robert Baumbach, Walt Coutier, and Dennis Threat) identified the original CAR deficiency were reviewed. As indicated in the response, position descriptions, PQSs and supporting documents were added to the files. Files were complete and available both in QATSS working files and in the QRC.

B. Extent

As indicated in the response, a compilation of actions taken to determine extent was available for review. The compilation indicated that all qualification files had been reviewed and that each had at least one discrepancy similar to the original finding. Additional qualification files (Robert Holliday, Tom Swift, and Emily Reiter) were reviewed as a part of the corrective action verification and it was found that the appropriate documentation had been added to these files.

D. Root Cause/ Corrective Action to Prevent Recurrence:

A letter designating Paula Richerson as being responsible for maintaining personnel qualification working files was obtained. Ms. Richerson was also the contact for obtaining records necessary for verification. She was found to be knowledgeable in the area of training and qualification records requirements.

The supervisor identified in the response was trained to the requirements of HLP 2.1Q as evidenced by completed Self Study sheets. Since L. Wagner is the only individual currently responsible for completing the qualification records and signing off as the supervisor, only his training file was reviewed.

Files for two individuals (Gary Wood and Steven McHenry) whose qualification records had been generated subsequent to implementation of corrective action for this CAR were reviewed to determine if the corrective action was effective in preventing recurrence. Both of the files contained the required information (position description, PQS, etc). The action to prevent recurrence appears to have been effective and the root cause appears to have been appropriately identified and addressed.

Verification performed by:

Carl E. Weber 1/12/95  
Carl E. Weber RW 3.1