



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

JAN 27 1995

Les E. Shephard
Technical Project Officer
for Yucca Mountain
Site Characterization Project
Sandia National Laboratories
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Albuquerque, NM 87185

**EVALUATION OF AMENDED RESPONSE TO CORRECTIVE ACTION REQUEST
(CAR) YM-94-093 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE
DIVISION'S (YMQAD) AUDIT YMP-94-09 OF SANDIA NATIONAL
LABORATORIES (SCPB: N/A)**

The YMQAD staff has evaluated the amended response, dated January 11, 1995, to CAR YM-94-093. The amended response has been determined to be unsatisfactory. The original response to this CAR, dated October 12, 1994, committed in part to revising or developing procedures to include the process agreed upon by the Process Quality Management Team. Corrective action based on completion of a Procedure Action Request as proposed in your amended response of January 11, 1995, is unacceptable. Corrective action requiring procedure development or modification will be accepted only by approval and issuance of the applicable procedures.

Please be advised that YMQAD's position in regard to closure of this CAR remains consistent with our letter to you of November 30, 1994. The plan and schedule for submittal of the existing procurement records will need to be submitted to YMQAD. The plan will be evaluated by YMQAD and, if acceptable, the schedule for verification of corrective actions will be based on the schedule for completion of the record submittal identified in the plan.

As indicated in YMQAD's letter of November 30, 1994, and consistent with both your original response and proposed amended response, the applicable procedures and plan were expected to be submitted to YMQAD on or before January 15, 1995. To date, neither the formal submittal of the procedures and plan nor an extension request to CAR YM-94-093 has been received by YMQAD. Our informal review of the plan identified that the plan was deficient in that no schedule for completion of the plan was identified and therefore no schedule for completion of the required corrective action identified. This has been

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communicated to your staff. It is imperative that the plan with the schedule for completion of the corrective action along with copies of issued procedure revisions or changes be submitted to YMQAD immediately.

Should you have any questions, please contact either Robert B. Constable at (702) 794-7945 or Mary G. McDaniel at (702) 794-7592.



Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-1892

Enclosure:
CAR YM-94-093

cc w/encl:

J. H. Hines, OGD, AL

~~J. 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

cc w/o encl:

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

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

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

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CORRECTIVE ACTION REQUEST

1 Controlling Document QAP 17-3, Revision 1	2 Related Report No. YMP-94-09
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3 Responsible Organization SNL	4 Discussed With M. Tucker
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5 Requirement:
QAP 17-3, Revision 1, Section 4.1, Step 7. states the LRC staff "...shall complete processing of records/record packages by:...transmitting the records within 30 days of acceptance by the LRC."

6 Adverse Condition:
Contrary to the identified requirement, procurement records are not being forwarded to the M&O Records Management Organization (Central Records Facility) for retention but are retained by SNL.

For example, refer to:

Supporting Information for Close-Out Package for Purchase Requisition 23-9583

Supporting Information for Close-Out Package for Purchase Requisition 78-6654

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
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11 Required Actions: Remedial Extent of Deficiency Preclude Recurrence Root Cause Determination

12 Recommended Actions:
Take action to submit procurement records to CRF or identify in appropriate SNL procedures how quality-related procurement records are being managed and preserved. Address applicable requirements of QARD DOE/RW-0333P.

7 Initiator Mary G. McDaniel <i>Mary G. McDaniel</i> 9/18/94	14 Issuance Approved by QADD <i>[Signature]</i> for Date 9.12.94
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15 Response Accepted QAR <i>Mary G. McDaniel</i> Date 11/21/94	16 Response Accepted QADD <i>[Signature]</i> for Date 11.29.94
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17 Amended Response Accepted QAR _____ Date _____	18 Amended Response Accepted QADD _____ Date _____
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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)

CAR YM-94-093

A. Remedial Action

A plan for submittal of existing procurement records to the CRF will be developed and initiated based on the results and actions described in D below. (Responsible Individual: Peggy Warner; Anticipated Completion Date: January 15, 1995).

B. Extent of the Deficiency


All QA and Non-QA procurement records are handled the same because the process has been documented in an informal Memo of Understanding between the Project Procurement Specialists and the Records Management staff. Therefore, this deficiency affects all procurement records.

D. Corrective Action to Preclude Recurrence

Background Information: Records were not being forwarded because of company proprietary information (e.g., salaries, formulas to determine contractor loads, etc.) contained in the records. The release of YAP 17-1Q (dated 5/31/94) allows for intentional obliteration of such proprietary information.

A PQMT (Process Quality Management Team) has been formed and procedures (QAIP 4-1 and QAIP 17-3) will be revised or new procedures developed to include the process agreed upon by this team. Objectives of the PQMT are as follows:

- To identify those procurement records that need to go forward (QA and Non-QA) to the CRF.
- To identify those procurement records that can be kept by Sandia and destroyed per the OCRWM RIDS.
- Develop a plan for submittal of existing procurement records. (Responsible Individual: Peggy Warner; Anticipated Completion Date: January 15, 1995)


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

**Amended Reponse for CAR YM-94-093
for Section D., "Corrective Action to Preclude Recurrence"**

D. Corrective Action to Preclude Recurrence

A PQMT (Process Quality Management Team) has been formed and a Procedure Action Request will be completed for procedures QAIP 4-1 and QAIP 17-3 to include the process agreed upon by this team. Objectives of the PQMT are as follows:

- To identify those procurement records that need to go forward(QA and Non-QA) to the CRF.
- To identify those procurement records that can be kept by SNL and destroyed per the OCRWM RIDS.
- Develop a plan for submittal of existing procurement records.

Responsible Individual: Peggy Warner, Anticipated Completion Date: 01/15/95.