

U.S. DEPARTMENT OF ENERGY
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
OFFICE OF QUALITY ASSURANCE

SURVEILLANCE REPORT OF
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
WASHINGTON, D.C.

SURVEILLANCE NUMBER 92-12

SEPTEMBER 9 TO 11, 1992

ON

CLOSURE OF THE M&O READINESS REVIEW HOLD POINTS

Prepared by: W. R. Marchand
W. R. Marchand
Surveillance Team Leader
Headquarters QA Division

Date: 10/7/92

Approved by: R. W. Horton
Donald G. Horton
Director, Office of Quality
Assurance

Date: 5/26/93

1.0 EXECUTIVE SUMMARY

As a result of Quality Assurance Surveillance HQ-SR-92-12, the surveillance team determined that the M&O did not follow applicable quality assurance procedures when tracking and closing readiness review Hold Points.

The M&O's Quality Assurance Department generated CAR-92-QA-C-029 to document and track the identified deficiencies. This action by the M&O precluded the need for the OQA to issue a corrective action request.

It should be noted that while specific procedural steps were not followed, documented evidence was available to provide adequate confidence that the M&O's QA Department was tracking, statusing, and verifying closure of Hold Points.

2.0 SCOPE

The Office of Quality Assurance conducted the surveillance to assess the effectiveness of the closure of Hold Points established during readiness reviews conducted by the M&O at Las Vegas, NV; Charlotte, NC; and Vienna, VA. The surveillance was performed at the M&O's Dunn Loring Office on September 9 through 11, 1992.

The surveillance team used the following M&O documents as a basis for their activities:

- QAP 2-6, Revision 0, *Readiness Review*;
- QAP 2-6, Revision 1, *Readiness Review*;
- Readiness Review Report (Las Vegas, 11/22/91 - 12/18/91);
- Readiness Review Report (Charlotte, 12/18/91 - 2/18/92);
- Readiness Review Report (Vienna 2/18/91 - 4/22/92).

3.0 SURVEILLANCE TEAM

Team Leader - W.R. Marchand (Weston)
Team Member - L.W. Wagner (CER)
Observer - J.G. Spraul (NRC)

4.0 PERSONNEL CONTACTED

The following M&O personnel were contacted during the course of the surveillance.

J. Brackett
F. Nash
W. Waggoner
J. Tierney
R. Morgan
P. Horsman
J. Watson

5.0 SUMMARY OF SURVEILLANCE RESULTS

A pre-surveillance meeting was held to introduce the team and establish contacts within the M&O. Personnel in attendance are listed on Attachment 1.

A previous surveillance, YM-SR-92-005, was conducted at the project office by YMPO QA staff. That surveillance determined that there was no evidence of the Readiness Review Team Leader (RRTL) tracking and documenting closure of Open Items, contrary to procedure requirements. This resulted in the issuance of CAR-YM-92-037 which required that QAP 2-6 be revised to include space on the Open Item form for the RRTL to document closure.

Subsequently, QAP 2-6, Revision 1, was issued with the Open Item form providing space for the RRTL to document closure. Additionally, this revision required the QA Manager to track and verify closure of Open Items but provided no space on the Open Item form for documenting this verification.

Since all Hold Points were established using the Open Item forms in QAP 2-6, Revision 0, the form provided no space for the RRTL to document closure, or for the QA Manager to verify closure, as now required by QAP 2-6, Revision 1. The block on this form entitled, "Verified By", was interpreted to be signed by the original preparer attesting to his satisfaction of actions completed for closure.

Prior to Revision 1 of QAP 2-6, the responsibility for tracking Open Items associated with the Las Vegas Readiness Review was delegated to the QA Manager by the Readiness Review Team Secretary. Additionally, the QA Manager maintained a tracking system for Open Items from the Charlotte and Vienna Readiness Reviews. Detailed record packages were assembled for all Hold Points that provided an up to date status.

The surveillance team reviewed the available documentation and determined that 29 of the original 31 Hold Points had closure approved by the M&O General Manager without evidence of verification of closure by the RRTL and the QA Manager, as required by QAP 2-6, Revision 1. Many of the Open Item reports were not signed by the preparer, as required by QAP 2-6.

These deficiencies were brought to the attention of the M&O. The M&O requested to document and track these deficiencies within the scope of the M&O's QA Program. The Surveillance Team acknowledged this request. The M&O's QA Organization issued CAR-92-QA-C-029 to document the deficiencies.

Presently two (2) Hold Points, 1 and 10, from the Vienna Readiness Review, remain open and continue to be tracked by the M&O QA Manager.

6.0 RECOMMENDATIONS

No recommendations.

OFFICE OF CIVILIAN
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ATTENDANCE RECORD

<input type="checkbox"/> AUDIT	SUBJECT <i>TRACKING/CLOSURE OF OPEN ITEM/HOLD POINTS</i>	<input type="checkbox"/> TEAM BRIEFING
<input checked="" type="checkbox"/> SURVEILLANCE		<input checked="" type="checkbox"/> PRE-CONFERENCE
<input type="checkbox"/> TRAINING/INDOCTRINATION		<input type="checkbox"/> POST-CONFERENCE

AUDIT OR SURVEILLANCE LEADER/INSTRUCTOR(S)
W.R. Marchand DATE SEPT 9, 1992
 Signature

CLASS LENGTH _____
 Signature _____

BRIEF SUMMARY OF MATERIAL COVERED _____

NAME OF ATTENDEE (PRINTED)	SIGNATURE	ORGANIZATION/ COMPANY	POSITION/TITLE	PHONE NUMBER
W.R. MARCHAND	<i>W.R. Marchand</i>	WESTON/LIE&C	Sr. QA ENGR.	202 646-6656
J.G. SPRAU	<i>J. Sprau</i>	NRC	Sr. QA Engr	308- 504-2446
RJ BRADSHAW	<i>RJ Bradshaw</i>	MDO/DESI	QA Manager	703- 201-8760
F.E. NASH	<i>F.E. Nash</i>	MDO/DESI	QA AUDITS MGR	703 201-8767
L.W. WAGNER	<i>L.W. Wagner</i>	CER	QA SPEC	703 276-9300
W.J. WAGGONER	<i>W.J. Waggoner</i>	Duke/MDO	QA Spec.	703 204-8772