



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

MAR 13 1995

L. Dale Foust
Technical Project Officer
for Yucca Mountain
Site Characterization Project
TRW Environmental Safety Systems, Inc.
Bank of America Center, Suite P-110
101 Convention Center Drive
Las Vegas, NV 89109

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF CORRECTIVE ACTION REQUEST (CAR) YM-94-070 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION'S (YMQAD) AUDIT YMP-94-01 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT AND OPERATING CONTRACTOR (SCPB: N/A)

The YMQAD staff has verified the corrective action to CAR YM-94-070 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 Kenneth O. Gilkerson at 794-7738.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-2482

Enclosure:
CAR YM-94-070

cc w/encl:
T. A. Wood, HQ (RW-14) FORS
J. G. Spraul, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
R. L. Robertson, M&O, Vienna, VA
Richard Jiu, M&O, Las Vegas, NV
R. P. Ruth, M&O, 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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PDR WASTE
WM-11 PDR

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

8 CAR NO.: YM-94-070
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CORRECTIVE ACTION REQUEST

1 Controlling Document OCRWM QARD DOE/RW-0333P, Revision 01		2 Related Report No. YMP-94-01	
3 Responsible Organization M&O		4 Discussed With Jim Houseworth	
5 Requirement: QARD, Section 2.1 establishes requirements for planning, implementing and maintaining the Quality Assurance Program. 2.2.2.B states: "Affected organizations shall establish quality assurance implementing documents applicable to their scope of work that translates QARD requirements into work processes."			
6 Adverse Condition: Contrary to the above requirements, M&O procedure NLP-3-17, Revision 01, "Development of Waste Isolation Fluctuations" does not implement the QARD Supplement III, Section 2.3 as written. This procedure allows the use of unqualified data and computer codes without being identified and tracked. NOTE: Procedure NLP-3-17 has been in effect since October of 1993. This CAR supplements CAR YM-94-015 but does not replace it. Discussion: The corrective action to CAR YM-94-015 addressed revising the OCRWM QARD to address issues relative to data used in WIEs for which no validation will be performed and subsequently revise project procedures. NLP-3-17 was revised in anticipation of QARD changes which never occurred and conflicts with the current QARD requirements.			
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	
8 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:			
7 Initiator Kenneth O. Gilkerson <i>Kent Gilkerson</i> 8-3-94		14 Issuance Approved by: QADD <i>[Signature]</i> Date 8-5-94	
15 Response Accepted QAR <i>[Signature]</i> Date 8/18/94		16 Response Accepted QADD <i>[Signature]</i> Date 8-24-94	
17 Amended Response Accepted QAR <i>[Signature]</i> Date 12/5/94		18 Amended Response Accepted QADD <i>[Signature]</i> Date 12-6-94	
19 Corrective Actions Verified QAR <i>[Signature]</i> Date 3/8/95		20 Closure Approved by: QADD <i>[Signature]</i> Date 3-13-95	

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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

1. Corrective Action Response for CAR YM-94-070

A. Remedial: This CAR is in error: the title of NLP-3-17 Rev. 01 is not "Development of Waste Isolation Fluctuations," it is "Waste Isolation Evaluations." Although NLP-3-17 Rev. 01 is titled "Waste Isolation Evaluations", the function of the documents prepared under this procedure is not consistent with the use of the term "waste isolation" in Supplement III of the QARD, nor with the QARD definition of scientific investigations. Requirements from Supplement III have not been identified in the requirements traceability matrix for NLP-3-17 Rev. 01. Evaluations addressing waste isolation, as used in the QARD, refer to documents that define repository performance. However, the function of Waste Isolation Evaluations is to provide guidance to site characterization activities and the associated use of tracers, fluids, and materials (TFMs) in the form of work control constraints to avoid adverse impacts to repository performance. Therefore, NLP-3-17 Rev. 01 is not subject to Supplement III requirements for scientific investigations and no remedial action is required at this time. See item C concerning potential remedial action that may result from further investigative actions.

B. Extent of Deficiency

1. The identified condition is present in NLP-3-17 Rev. 00 and Rev. 01. The condition identified in the CAR will not impact the results of WIEs nor their use in Determination of Importance Evaluations.
2. Additional investigations are planned to check extent of deficiency with respect to section 2.0 and 3.0-QARD requirements and existing CARs concerning control of TFMs.

C. Preclude Recurrence:

Closure of CAR YM-94-015 will address all issues related to recurrence of the identified condition.

D. Root Cause Determination: Confusion concerning the applicable QARD requirements for Waste Isolation Evaluations.

2. Response Actions

1. Change name of WIEs to "Site Impact Evaluations".
2. Review line procedure NLP-3-17 with respect to QARD sections 2.0 and 3.0. Revise line procedure as appropriate.
3. Coordinate response for TFM CARs to ensure extent of deficiency is accurate. Amend CAR response if needed.

Responsible: Albin Brandstetter

Anticipated Completion: 12/31/94

3. Response Approved:

Jean A. Younker
Regulatory and Technical Evaluation Manager

Date: 8-16-94

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B. Extent of Deficiency

1. The identified condition is present in NLP-3-17 Rev. 00 and Rev. 01. The condition identified in the CAR will not impact the results of WIEs nor their use in Determination of Importance Evaluations.
2. Additional investigations are planned to check extent of deficiency with respect to section 2.0 and 3.0 QARD requirements and existing CARs concerning control of TFMs.

C. Preclude Recurrence:

Closure of CAR YM-94-015 will address all issues related to recurrence of the identified condition.

D. Root Cause Determination: Confusion concerning the applicable QARD requirements for Waste Isolation Evaluations.

2. Response Actions

1. Review line procedure NLP-3-17 with respect to QARD sections 2.0 and 3.0. A revised line procedure (NLP-2-0) for Determination of Importance Evaluations (DIE) is planned. Under the revised line procedure, Waste Isolation and Test Interference Evaluations (TIE) will be documented as sections of the DIE rather than separate documents. The revision of NLP-2-0 consolidating DIE, WIE, and TIE procedures will incorporate any findings from the review of NLP-3-17 to ensure compliance with the QARD.
2. Coordinate response for TFM CARs to ensure extent of deficiency is accurate. Amend CAR response if needed.

Responsible: Albin Brandstetter

Anticipated Completion: 12/31/94

3. Response Approved:


Regulatory and Technical Evaluation Manager

Date: 11/17/94

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B. Extent of Deficiency

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2. Additional investigations are planned to check extent of deficiency with respect to section 2.0 and 3.0 QARD requirements and existing CARs concerning control of TFMs.

C. Preclude Recurrence:

Closure of CAR YM-94-015 will address all issues related to recurrence of the identified condition.

D. Root Cause Determination: Confusion concerning the applicable QARD requirements for Waste Isolation Evaluations.

2. Response Actions

1. Review line procedure NLP-3-17 with respect to QARD sections 2.0 and 3.0. A revised line procedure (NLP-2-0) for Determination of Importance Evaluations (DIE) is planned. Under the revised line procedure, Waste Isolation and Test Interference Evaluations (TIE) will be documented as sections of the DIE rather than separate documents. The revision of NLP-2-0 consolidating DIE, WIE, and TIE procedures will incorporate any findings from the review of NLP-3-17 to ensure compliance with the QARD (Hastings, to be completed by 2/28/95).
2. Coordinate response for TFM CARs to ensure extent of deficiency is accurate. Amend CAR response if needed (Brandstetter, completed).

3. Response Approved:

Martha W. Anderton, for Jean L. Younker
Regulatory and Technical Evaluation Manager

Date: 12/22/94

VERIFICATION OF CORRECTIVE ACTION FOR DESIGN PACKAGE 2C CARS
YM-94-015 AND YM-94-070:

On September 15, 1994, remedial corrective actions were verified to have been implemented for CARS YM-94-015 and YM-94-070 by K. O. Gilkerson (YMQAD). This was a limited scope verification, relative to only the remedial actions regarding control of TFMs to determine any adverse impacts on the extent of deficiency or corrective action commitments of this CAR. The resulting investigation results indicated no adverse impacts. See correspondence dated 9/15/95 from Younker to Spence (LV.RTE.JLY.09/94-132). Additional corrective action verifications were conducted on 3/6/95 through 3/7/95 wherein the new M&O NLP-2-0 revision one was reviewed relative to the CAR commitments. NLPs-3-16 and -3-17 were deleted and rolled into the DIE procedure (NLP-2-0) as required. Based on this review, it is recommended that these CARS be closed.



Kenneth O. Gilkerson, QAR

3/8/95

Date