



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

JUL 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

ISSUANCE OF SURVEILLANCE RECORD YMP-SR-95-021 RESULTING FROM
YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION'S (YMQAD) SURVEILLANCE
OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT
AND OPERATING CONTRACTOR (CRWMS M&O) (SCPB: N/A)

Enclosed is the record of Surveillance YMP-SR-95-021 conducted
by the YMQAD at the CRWMS M&O facilities in Las Vegas, Nevada,
February 14 through June 9, 1995.

The purpose of the surveillance was to verify that field design
changes are performed in accordance with the requirements of
Quality Assurance Requirements and Description, Paragraph 3.2.8,
Design Change Control and CRWMS M&O procedure NLP-3-25. The
extended time of the surveillance was to allow for issuance and
implementation of NLP-3-25.

Corrective Action Request (CAR) YM-95-033 was issued as a result
of this surveillance. Response to the CAR, which was transmitted
via separate letter, has been received and the CAR has been
closed.

This surveillance is considered completed and closed as of the
date of this letter. A response to this surveillance record
and any documented recommendations is not required.

If you have any questions, please contact either Mario R. Diaz at
794-7974 or Patout H. Cotter at 794-7706.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:MRD-3902

Enclosure:
Surveillance Record
YMP-SR-95-021

YMP-5

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JUL 13 1995

L. Dale Foust

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cc w/encl:

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

QUALITY ASSURANCE SURVEILLANCE RECORD

SURVEILLANCE DATA

¹ORGANIZATION/LOCATION:
Management and Operating
Contractor (M&O), Las Vegas,
NV

²SUBJECT:
Evaluation of Field Changes to Class III
Design Documents

³DATE:
02/14/95

⁴SURVEILLANCE OBJECTIVE:
Verify implementation of selected requirements for the control of M&O field changes to class III design documents

⁵SURVEILLANCE SCOPE:
Verify that field design changes are performed in accordance with the
requirements of QARD Paragraph 3.2.8, Design Change Control and NLP-3-25

⁶SURVEILLANCE TEAM:
Team Leader:
P.H. Cotter
Additional Team Members:

⁷PREPARED BY:
P.H. Cotter L.C. Wann for
Surveillance Team Leader Date 02/13/95

⁸CONCURRENCE:
N/A
QA Division Director Date

SURVEILLANCE RESULTS

⁹BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:
See Page(s) 2

¹⁰SURVEILLANCE CONCLUSIONS:
See Page(s) 2

¹¹COMPLETED BY:
P.H. Cotter L.C. Wann for
Surveillance Team Leader Date 07/07/95

¹²APPROVED BY:
P.H. Cotter for
QA Division Director Date 7/13/95

**Block 9 (Continued) BASIS OF EVALUATION /DESCRIPTION OF
OBSERVATIONS**

The surveillance was terminated on June 9, 1995 because MLP-3-25 had not been issued. Therefore, verification of field design changes was limited to QARD requirements.

Attributes verified:

- o Field design changes are justified and are subject to design control measures commensurate with those applied to the original design.
- o Design control measures for changes include provisions to ensure that the design analysis for the items are still valid.
- o Field changes are approved by the same organizations that reviewed and approved the original design document.
- o Field changes shall be incorporated into affected design documents when such incorporation is appropriate.

Documents Reviewed:

NLP-3-10/Rev. 3, BCPs-02-95-008, 010, 014, 018, 019, 020, 023, 025, 034, 036

Personnel Contacted: C. Garrett, R. Skorseth, J. Naaf

Block 10 (Continued) SURVEILLANCE CONCLUSIONS

The surveillance found that field design changes were for the most part in compliance with QARD requirements, except for the adverse conditions identified in CAR YM-95-033.

CAR YM-95-033 identified the following adverse conditions:

1. The use of the Baseline Change Proposal (BCP) process for design changes although M&O procedures states it is not to be used for design changes.
2. Statements by individuals that the BCPs are not design changes, although they are used to revise specifications and drawings.
3. Lack of rigorous checking of BCP changes.
4. Design changes are not being verified during the BCP process; therefore, the design work is not being done on a timely basis.

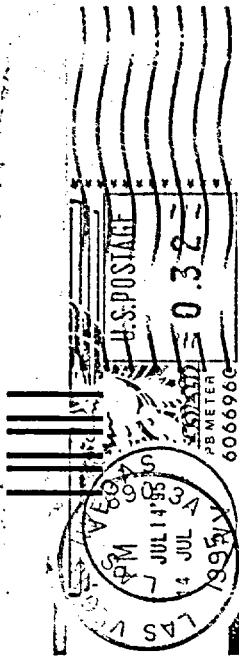
RECOMMENDATION

Since the new BCP procedure had not been implemented, it is felt that an additional surveillance should be performed to determine the effectiveness of the M&O field design change controls after the new procedure, NLP-3-25, has been implemented.

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J. SPRAUL



~~NRC~~
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