



Department of Energy  
Washington, DC 20585

MAY 9, 1995

QA: L

Mr. R.L. Robertson  
General Manager  
CRWMS, M&O  
TRW Environmental Safety System, Inc.  
2650 Park Tower Drive, Suite 800  
Vienna, VA 22180

Subject: Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance (QA) Surveillance HQ-SRP-95-01 of M&O Procurement Activities

Dear Mr. Robertson:

Enclosed is OCRWM Report HQ-SRP-95-01 for the subject surveillance conducted by the Office of Quality Assurance to evaluate the M&O QA Program effectiveness with regard to the process for development and revision of Multi-Purpose Canister (MPC) procurement documents.

As a result of the surveillance, three deficiencies were corrected during the surveillance and eight recommendations were identified for consideration by M&O management.

If you have any questions, please contact me at (202) 586-1238 or James George of QATSS at (202) 488-5429.

*R.W. Clark*

Robert W. Clark, Director  
Headquarters Quality Assurance  
Division

160019

ADD: W.D. Travers T8FS 1 1  
G.J. Haughney T8FS 1 1  
F.L. Sturz T8FS 1 1  
J.P. Jankovich T8FS 1 1  
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L. H. Barrett, HQ (RW-2) FORS

T. Wood, RW-14

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R. R. Loux, NWPO, Carson City, NV

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

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Yucca Mountain Information Office, Eureka, NV

Lander County Board of Commissioners, Battle Mountain, NV

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William Offutt, Nye County, Tonopah, NV

Florindo Mariani, White Pine County, Ely, NV

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Miffiin and Associates, Las Vegas, NV

J. Blandford, M&O, Vienna, VA

J. Willis, M&O, Vienna, VA

R. P. Ruth, M&O/Duke, Las Vegas, NV

R. A. Morgan, M&O/Duke, Vienna, VA

C. J. Henkel, NEI, Washington, DC

J. George, QATSS, DC

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

QUALITY ASSURANCE SURVEILLANCE RECORD

SURVEILLANCE DATA

<sup>1</sup>ORGANIZATION/LOCATION: CRWMS M&O/Vienna, VA      <sup>2</sup>SUBJECT: Re-evaluation of the MPC Procurement Process      <sup>3</sup>DATE: ~~4/18-22/95~~ 4/17-20/95 JG

<sup>4</sup>SURVEILLANCE OBJECTIVE: To determine the effectiveness of the technical/procurement process for the MPC Procurement leading up to contract award(s).

<sup>5</sup>SURVEILLANCE SCOPE: Evaluation to include:  
1. Identify need/scope for technical/procurement documents.  
2. Plan process for revising documents.  
3. Revise documents.  
4. Review documents.  
5. Approve, Release and issue documents.  
6. Perform baseline change control.

<sup>6</sup>SURVEILLANCE TEAM:  
Team Leader: Hugh Lantz  
~~Richard Peck~~ JG  
Additional Team Members:  
Walter Coutier, Fred Bearham  
Dennis Threatt, Charles Betts  
Hugh Lantz, Richard Peck JG

<sup>7</sup>PREPARED BY: [Signature] 3/30/95 Date  
Surveillance Team Leader

<sup>8</sup>CONCURRENCE: [Signature] 3/30/95 Date  
QA Division Director

SURVEILLANCE RESULTS

<sup>9</sup>BASIS OF EVALUATION / DESCRIPTION OF OBSERVATIONS:  
See Pages 2-4

<sup>10</sup> SURVEILLANCE CONCLUSIONS:  
See Page 4

<sup>11</sup> COMPLETED BY: [Signature] 4/26/95 Date  
Surveillance Team Leader

<sup>12</sup> APPROVED BY: [Signature] 5/8/95 Date  
QA Division Director

## 9 BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS

The surveillance was conducted to evaluate the effectiveness of the Civilian Radioactive Waste Management System (CRWMS) Management & Operating Contractor (M&O) Quality Assurance Program as described in M&O Quality Administrative Procedures with regard to M&O development and revision of the Multi-Purpose Canister (MPC) procurement documents. The Quality Assurance Program process and activities evaluated during the surveillance are presented in the Surveillance Scope of the Quality Assurance Surveillance Record.

Requirements were drawn from DOE/RW-0333P, *Quality Assurance Requirements and Description* (QARD) document, revision 2; M&O implementing Quality Administrative Procedures (QAPs); and related M&O location specific line procedures.

### PERSONNEL CONTACTED

Personnel contacted during the surveillance are listed in Attachment 1. The list includes those who attended the pre-surveillance and post-surveillance meetings.

### SUMMARY OF AUDIT RESULTS

#### Program Effectiveness

The surveillance team concluded that, in general, M&O process controls are effectively being implemented for areas identified in the scope of the surveillance.

#### QA Program Surveillance Activities

The details of the surveillance evaluation along with objective evidence reviewed are contained within the surveillance checklists. The checklists are processed as non-permanent QA Records. A summary table of surveillance results is provided in Attachment 2.

#### Summary of Deficiencies

##### **Deficiencies Corrected During The Surveillance**

Deficiencies, which are considered isolated in nature and only require remedial action, may be corrected during the surveillance. The following deficiencies were corrected during the surveillance:

- 1) Design Review Summary Sheet back check dates were altered with no explanation. Procedure QAP-3-9 is being changed (Procedure Action Request form, dated 4/14/95, verified) requiring the explanation to be documented in the "Remarks" section of the Summary Sheet.
- 2) Document Review Record for MPC Design Procurement Specifications, dated 5/18/94, reviewed by J. S. Ray had changes to entries on Qualification Requirements without concurring initials & dates for all changes. Proper initials and dates were verified as added to the Record.
- 3) Design Analysis, "Qualification of Spent Nuclear Fuel Assembly Characteristics for Use as a Design Basis", did not meet QAP-3-9; incorrect terminology, no criteria, no assumptions, and no conclusions. The surveillance team verified that the analysis in question was reworked and documented correctly.

#### **Recommendations**

The following recommendations resulted from the surveillance and are presented for consideration by the M&O management. The surveillance team recommends:

- 1) A management procedure be developed for processing questions and comments from offerers. At present, a database is being used to track and document responses to offerer concerns. Formalizing this activity would provide better control.
- 2) Technical Document Preparation Plan (TDPP) for the Design Requirements Documents be revised to be consistent with current plans for handling To-Be-Verified (TBVs) at procurement contract award. The TDPP requires the TBVs to be identified in the Design Procurement Specifications (DPS) to the supplier at contract award. However, the recently issued IOC on SOW/DPS revision strategy changes this decision. (This is not a deficiency at this time because the surveillance was being conducted prior to contract award.)
- 3) A method of maintaining possible revision data for the Facility Interface Capability Assessment (FICA) be developed. FICA data was transmitted as QAP-3-12 Design Input Data. However, this input data will not be updated as changes occur to the FICA.
- 4) The use of terms "released" and "cleared" be defined with respect to removing the TBV notation from technical documents.

- 5) Methodology other than the QAP-3-9 analysis procedure be used for clearing non-technical TBVs. A design analysis is performed to resolve a technical issue and is not just a method for clearing TBVs.
- 6) The informal system for numbering QAP-3-12 Design Input Transmittals be formalized or strictly controlled.
- 7) Review criteria in the Procurement Document Approval Records be evaluated for applicability with the MPC System Acquisition Plan and the MPC Request For Proposal .
- 8) TBV program be reviewed for level of conservatism applied, definition of "unqualified data", and the methods to clear and release.

## 10 SURVEILLANCE CONCLUSIONS

As a result of Performance-Based Quality Assurance Surveillance HQ-SRP-95-01, the surveillance team determined that the M&O is satisfactorily implementing an effective QA program and process controls for developing and revising the MPC procurement documents.

The surveillance team identified three deficiencies, requiring only remedial action, that were corrected during the surveillance. Eight recommendations were identified for M&O management consideration. The deficiencies and recommendations are described in Section 9 of this report.

### LIST OF ATTACHMENTS

Attachment 1: Personnel Contacted During the Surveillance  
Attachment 2: Summary Table of Surveillance Results

ATTACHMENT 1

PERSONNEL CONTACTED DURING THE SURVEILLANCE

NAME	TITLE	CONTACT	MEETINGS	
			PRE	POST
F. Bearham	Surveillance Team	X	X	X
L. Beatty	Systems Engineer	X	X	
C. Betts	Surveillance Team	X	X	X
J. Blandford	Deputy Assistant General Manager	X	X	X
W. Booth	Weston QA Engineer			X
D. Boyt	MPC Project COTR	X	X	X
G. Carruth	Manager; System Integration	X	X	X
J. Cassidy	Quality Engineering Manager	X	X	X
P. Chomentowski	QA Engineer	X	X	X
J. Clark	MPC Project Manager	X	X	
W. Coutier	Surveillance Team	X	X	X
C. Denton	Design Engineer	X	X	X
M. Donovan	Quality Engineer	X	X	X
W. Farmer	QA Technical Specialist	X		X
D. Franks	QA Surveillance Manager			X
J. George	QATSS Verification Lead		X	X
J. Hadley	WAST Design Engineer	X		
G. Keener	QA Technical Specialist	X	X	X
C. Kelly	Training Specialist	X	X	X
R. Kelly	Transportation Manager	X		
A. Kubo	Assistant General Manager		X	
P. Kumar	RW-46 Engineer	X	X	
F. Lentz	Surveillance Team Leader	X	X	X
J. Lim	Systems Engineer	X		
J. MacCarthy	Manager of Waste System Integration	X		
R. MacDonald	Waste Acceptance Task Manager	X		
V. McCormic	Trans. Design Analyst	X		
A. McHenry	Records Analyst	X		
R. Morgan	Vienna QA Manager			X
M. Majumder	Procurement QA Liaison			X
J. Morelli	Systems Engineer	X		
R. Peck	Surveillance Team	X	X	X
K. Rees	Subcontracts Manager		X	
P. Schlereth	QA Engineer, Sr.	X	X	
W. Schneider	Subcontracts Manager			X

ATTACHMENT 1 (CONTINUED)

PERSONNEL CONTACTED DURING THE SURVEILLANCE

NAME	TITLE	CONTACT	MEETINGS	
			PRE	POST
N. Seagle	Engineering Supervisor	x		
L. Stallings	Assistant Project Manager	x		x
S. Stewart	Document Coordinator	x		
J. Stringer	Manager, Waste Design	x	x	x
T. Swift	QA Engineer	x		x
C. Taylor	Assistant Engineer	x		
D. Threath	Surveillance Team	x	x	x
J. Thornton	Engineering Consultant	x		
J. Tierney	Quality Engineering Support Manager	x	x	x
D. Williamson	WA Engineer	x		
J. Willis	Requirements Manager	x	x	x
J. VanOrmer	Systems Engineer	x	x	x

## SURVEILLANCE HQ-SRP-95-01 DETAIL SUMMARY

ELEMENT	PROCESS STEP	DETAILS ( LIST)	CARs	CDS	RECOM	ADEQUACY	COMPLIANCE	OVERALL
<b>PERFORMANCE BASED</b>								
<b>M&amp;O CONTROL OF DEVELOP/ REVISION OF MPC PROCRMNT DOCUMNTS</b>	IDENTIFY NEED/SCOPE	Pgs 1 - 5 Pgs 1 - 5		1 & 3	3, 5 6, 8	N	N	
	DEFINE/PLAN PROCESS FOR REVISING	Pgs 1 - 4 Pgs 1 - 8 Pgs 1 - 8 Pgs 1 - 5			1	N	N	
	DEVELOP DOCUMENT/ REVISION	Pgs 1 - 7			2	N	N	
	REVIEW DOCUMENT/ RESOLVE COMMENTS	Pgs 1 - 4		2	7	N	N	
	APPROVE, RELEASE, ISSUE DOCUMENT	Pgs 1 - 5				N	N	
	BASELINE CHANGE CONTROL	Pgs 1 - 2			4	N	N	
<b>TOTAL</b>		53		3	8			<b>EFFECTIVE</b>

CARs ..... Corrective Action Requests  
 CDS ..... Corrected During Surveillance  
 RECOM ..... Recommendations  
 OVERALL ..... Summary of Element  
 N ..... None/Not Applicable