



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

WBS 1.2.9.3  
QA

OCT 25 1991

Richard L. Bullock  
Technical Project Officer  
for Yucca Mountain  
Site Characterization Project  
Raytheon Services Nevada  
101 Convention Center Drive  
Phase II, Suite P-250  
Las Vegas, NV 89109

EVALUATION OF RESPONSE TO AND CLOSURE OF CORRECTIVE ACTION REQUEST (CAR)  
YM-91-073 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD)  
AUDIT YMP-91-04 OF RAYTHEON SERVICES NEVADA (RSN)

The YMQAD staff has evaluated the response to CAR YM-91-073. The response has been determined to be satisfactory and no further actions are deemed necessary; however, RSN management may want to take further action based on the comments and conclusions that follow:

1. DOE FW-0214, Revision 4, Office of Civilian Radioactive Waste Management Quality Assurance Requirements Document, Section 17, requires (by reference to ASME NQA-1, Supplement 17S-1) that the quality assurance (QA) records receipt control system include a method for designating the required records.
2. YMP/CC-0016, Revision 2, "YMP Records Management Plan," Appendix A, "Identification, Preparation, Submittal, and Correction of Records," paragraph A.2.1, "Identification of Records" states in part:

"Records shall be identified in accordance with the following requirements:

1. Records and record packages (both QA and non-QA) to be generated, supplied, submitted, and maintained shall be specified and identified in all design specifications, procurement documents, task plans, study plans, test procedures, implementing procedures, instructions, or other YMP or Participant documents."
3. The procedural requirement cited in the CAR, PP-17-03, Revision 0, paragraph 5.1, is an almost direct quote from Appendix A, paragraph A.2.1.1, of the Yucca Mountain Site Characterization Project (YMP) Records Management Plan, YMP/CC-0016, Revision 2, and appears to be the RSN method of designating required records.

YMP-5

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PDR WASTE  
WM-11 PDR

ADD: Ken Hooks

UH. Encl.

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Richard L. Bullock

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4. As implied in the RSN CAR response, the auditor had expected to see each implementing procedure address:
  - a. Individual QA Records.
  - b. QA Record Packages.

If the procedure did not produce any QA Record Packages, a positive statement to that effect was expected.

5. The auditor also expected RSN to take preventive action by revising procedures PP-05-01, paragraph 6.1.7, and QAP-5.1(Y), paragraph 6.1.8g, to reflect that implementing procedures must address QA Record Packages.
6. In the response to this CAR, RSN has provided a list of which procedures address record packages along with a statement that the balance of the (procedures) identify the individual records that are to be submitted, i.e., it is RSN's position that they have met their procedural commitment.
7. Based on a review of the information supplied by RSN in the response, it has been determined that RSN appears to have addressed the intent of the requirement but had not stated in a positive manner when Record Packages did not exist.
8. While reviewing the information supplied by RSN in the response, it was noted that in at least one instance RSN has called for a Record Package within the body of the procedure but has not clarified in Section 7 what constituted the Record Package (i.e., PP-02-04, Section 7.0, lists a number of documents as QA Records but does not clarify that they are or are not part of the Readiness Review Package referred to in paragraph 6.9 of the procedure).
9. The RSN commitment to revise procedure PP-17-03 by September 30, 1991, to clarify intent by stating "records or record packages" will not result in value added clarification. Besides, the proposed revision would cause the procedure to be in conflict with the YMP Records Management Plan.

#### CONCLUSION

1. Based on review of the RSN response to the subject CAR, YMQAD agrees that RSN has addressed the subject of record packages in presently written RSN procedures; however, in order to take full credit, RSN should:
  - a. Provide the list of which procedures generate record packages to their Local Records Center.
  - b. Revise PP-02-04, Section 7.0, to clarify which records are part of the Readiness Review Package.
2. To help prevent recurrence of misunderstandings or inadvertent non-implementation, RSN should revise procedures PP-05-01 and QAP-5.1(Y) to reflect the requirements of PP-17-03 regarding record packages.

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

14 CAR NO.: YM-91-073  
 DATE: 08/08/91  
 SHEET: 1 OF 1  
 QA  
 WBS No.: 1.2.9.3

**CORRECTIVE ACTION REQUEST**

1 Controlling Document RSN PP-17-03, Rev. 0	2 Related Report No. Audit YMP-91-04
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3 Responsible Organization RSN	4 Discussed With J.L. Rue
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10 Response Due 20 days from issue	11 Responsibility for Corrective Action R.L. Bullock	12 Stop Work Order Y or N No
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5 Requirement:  
 RSN PP-17-03, Rev. 0, Para. 5.1 states in part, "RSN Department managers are responsible for:  
 A. Ensuring that all design specifications, procurement documents, task plans, study plans, test procedures, implementing procedures, instructions, statements of work, or other documents specify the QA records and records package to be generated, supplied, or maintained as a result of that process, and that personnel who generate, receive or approve these records submit them to the RMC.

6 Adverse Condition:  
 RSN Department Managers are not ensuring that implementing procedures specify the records package to be generated.  
  
 DISCUSSION  
 Objective evidence was found that implementing procedures are identifying QA records to be generated; however, no procedures were found that addressed records packages.

7 Recommended Action(s):  
 Correct the deficiency identified. Investigate to determine if there are other similar deficiencies. Take action to prevent recurrence.

8 Initiator R.E. Powe	Date: 08/08/91	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: OOA <u>Catherine Hampton</u>	Date: 8-12-91
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15 Verification of Corrective Action:  
 No Verification required. *not* - See Evaluation of CAR Response (R) 10/25/91

16 Corrective Action Completed and Accepted: OOA <u>R. E. Powe</u> Date <u>10/21/91</u>	17 Closure Approved By: OOA <u>R. E. Spence</u> <u>10/25/91</u>
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WASHINGTON, D.C.

CAR NO YM-91-073  
DATE 9/11/91  
SHEET 1 OF 1

**CORRECTIVE ACTION REQUEST**  
(continuation sheet)

**A. Extent of Deficiency**

This is not a valid deficiency due to the following reasons:

A review of current procedures indicates that the following procedures identify record packages:

PP-01-04 RO Issued 7-12-91 Section 7.0  
PP-02-04 RO Issued 4-29-91 Section 6.9  
PP-02-05 RO Issued 2-15-91 Section 7.0  
PP-03-03 RO Issued 4-15-91 Section 7.0  
PP-04-01 RO Issued 2-15-91 Section 7.0  
PP-17-04 RO Issued 6-14-91 Section 6.9  
PP-19-05 RO Issued 6-14-91 Section 7.0  
QAP-7.2(Y) RO Issued 7-23-91 Section 7.0  
QAP-7.4(Y) RO Issued 7-23-91 Section 7.0  
QAP-18.1(Y) RO Issued 2-22-91 Section 7.0

These are the only procedures that require submittal as a record package. The balance of the identify the individual records that are to be submitted.

The RSN interpretation of PP-17-03, paragraph 5.1 is that all design specifications, procurement documents, task plans, study plans, etc., are to identify the QA records or record packages (as applicable) to be generated, supplied or maintained by that process. The auditor applied a different interpretation to paragraph 5.1, that this statement required both records and record packages to be identified. This is not the intent of paragraph 5.1. Paragraph 5.1 of PP-17-03 will be clarified by stating records or record packages will be identified. This action should be completed by September 30, 1991.

**B. Root Cause**

N/A

**C. Remedial Action**

N/A

**D. Corrective Action to Prevent Recurrence**

N/A

Response Approved: *T. L. Sullivan*

Date: 9/11/91

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WASHINGTON, D.C.

CAR NO. YM-91-073  
DATE: \_\_\_\_\_  
SHEET: \_\_\_\_\_ OF \_\_\_\_\_

**CORRECTIVE ACTION REQUEST  
(continuation sheet)**

Response Accepted: R. Stone See attached evaluation 10/21/91  
QAR Date

Response Accepted: R.C. Spence 10/25/91  
QQA Date

EVALUATION OF CAR YM-91-073 RESPONSE dated 9/11/91

The subject RSN response is acceptable as written and no further action regarding this CAR is necessary, however RSN management may want to consider taking further action based on the discussion and conclusions that follow.

DISCUSSION

1. DOE RW-0214, Revision 4, OCRWM QARD, Section 17 requires (by reference to ASME NQA-1, Supplement 17S-1) that the QA records receipt control system include a method for designating the required records.
2. YMP/CC-0016, Revision 2 "YMP Records Management Plan", Appendix A "Identification, Preparation, Submittal, and Correction of Records", paragraph A.2.1 "Identification of Records" states in part:

"Records shall be identified in accordance with the following requirements:

1. Records and record packages (both QA and non-QA) to be generated, supplied, submitted, and maintained shall be specified and identified in all design specifications, procurement documents, task plans, study plans, test procedures, implementing procedures, instructions, or other YMP or Participant documents."
3. The procedural requirement cited in the CAR, PP-17-03, Revision 0, paragraph 5.1 is an almost direct quote from Appendix A, paragraph A.2.1.1 of the YMP Records Management Plan, YMP/CC-0016, Revision 2 and appears to be the RSN method of designating required records.
4. As implied in the RSN CAR response, the auditor had expected to see each implementing procedure address:
  - a. Individual QA Records and
  - b. QA Record Packages.

If the procedure did not produce any QA Record Packages, a positive statement to that effect was expected.

5. The auditor also expected RSN to take preventive action by revising procedures PP-05-01, paragraph 6.1.7 and QAP-5.1(Y), paragraph 6.1.8g to reflect that implementing procedures must address QA Record Packages.
6. In the response to this CAR, RSN has provided a list of which procedures address record packages along with a statement that the balance of the (procedures) identify the individual records that are to be submitted, i.e. It is RSNs position that they have met their procedural commitment

EVALUATION OF CAR YM-91-073 RESPONSE dated 9/11/91 (Continued)

7. Based on a review of the information supplied by RSN in the response it has been determined that RSN appears to have addressed the intent of the requirement but had not stated in a positive manner when Record Packages did not exist.
8. While reviewing the information supplied by RSN in the response it was noted that in at least one instance RSN has called for a Record Package within the body of the procedure but has not clarified in Section 7 what constituted the Record Package (i.e. PP-02-04, Section 7.0 lists a number of documents as QA Records but does not clarify that they are or are not part of the Readiness Review Package referred to in paragraph 6.9 of the procedure).
9. The RSN commitment to revise procedure PP-17-03 by 9/30/91 to clarify intent by stating "records or record packages" will not result in value added clarification. Besides the proposed revision would cause the procedure to be in conflict with the YMP Records Management Plan.

CONCLUSION

1. Based on review of the RSN response to the subject CAR, YMQAD agrees that RSN has addressed the subject of record packages in presently written RSN procedures, however in order to take full credit RSN should:
  - a. Provide the list of which procedures generate record packages to their Local Records Center
  - b. Revise PP-02-04, Section 7.0 to clarify which records are part of the Readiness Review Package
2. To help prevent recurrence of misunderstandings or inadvertent non implementation RSN should revise procedures PP-05-01 and QAP-5.1(Y) to reflect the requirements of PP-17-03 regarding record packages.
3. RSN should not revise PP-17-03 to change the "and" to "or".

THIS CAR IS CONSIDERED CLOSED.

  
\_\_\_\_\_  
QAR

10/21/91  
DATE

Richard L. Bullock

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OCT 25 1991

3. RSN should not revise PP-17-03 to change the "and" to "or".

CAR YM-91-073 is considered closed.

If you have any questions, please contact either Catherine E. Hampton at 794-7973 or Richard E. Powe at 794-7749.

*R. E. Spence*

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:CEH-505

Enclosure:  
CAR YM-91-073

cc w/encl:

K. R. Hooks, NRC, Washington, ~~DC~~  
S. W. Zimmerman, NWPO, Carson City, NV  
M. J. Regenda, RSN, Las Vegas, NV

cc w/o encl:

J. W. Gilray, NRC, Las Vegas, NV  
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08