

August 16, 1995

0437

MEMORANDUM TO: Joseph Holonich, Chief  
High-Level Waste and Uranium Recovery  
Projects Branch  
Division of Waste Management

FROM: John Thoma, Section Leader  
High-Level Waste and Quality Assurance Section  
High-Level Waste and Uranium Recovery  
Projects Branch  
Division of Waste Management

SUBJECT: REVIEW OF FISCAL YEAR 1994 DOE AUDITS AND SURVEILLANCES WITH  
NO NRC OBSERVERS

My staff has reviewed the Fiscal Year 1994 DOE Office of Civilian Waste Management Office of Quality Assurance reports of audits and surveillances that were not observed by NRC staff members. There were 3 such audits and 68 such surveillances. Several surveillances were rescheduled or combined as noted in Attachment 2.

Our review indicated that the findings of the DOE audits and surveillances with no NRC observers are consistent with the findings of the DOE audits and surveillances observed by the NRC staff. Thus, the review increases our confidence that the DOE audits and surveillances are effective in identifying deficiencies.

A summary of the review results is attached. Attachment 1 covers audits and Attachment 2 covers surveillances. Each attachment lists the report number, organization audited or surveilled, date of the audit or surveillance, and the resulting corrective action requests (CARs). There were 44 CARs identified: 8 during the audits and 36 during the surveillances.

In addition to CARs, some of the reviewed reports identified recommendations made by the audit/surveillance teams. These do not require tracking or follow-up by DOE. We reviewed the recommendations to determine whether they should have been classified as CARs and concluded that they were properly classified by DOE.

Attachments: As noted.

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DATE	08/16/95		08/16/95		08/16/95				

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ATTACHMENT 1: RESULTS OF REVIEW OF FISCAL YEAR 1994 REPORTS OF DOE AUDITS  
WITH NO NRC OBSERVERS

<u>REPORT NUMBER</u>	<u>AUDITEE</u>	<u>DATE</u>	<u>CORRECTIVE ACTION REQUESTS</u>
HQ-94-01	SNL	11/8-12/93	<p>HQ-94-001: The actual SNL organization does not agree with current program documents and there is no evidence that the QA Program reporting and tracking system has been implemented.</p> <p>HQ-94-002: The QA Manual has not been kept current with SNL practices and does not comply with the applicable requirements of the Quality Assurance Requirements Document (QARD) DOE/RW-0214 Rev 3.</p> <p>HQ-94-003: There have been insufficient internal QA surveillances performed, no internal audits were performed in FY-93, and a sub-contracted service has not been audited in accordance with QA Program commitments.</p>
HQ-94-04	YMPO	7/25-29/94	-NONE-
YMP-94-08	LANL	8/15-19/94	<p>YM-94-078: Deficiencies in completed QA record packages.</p> <p>YM-94-079: Use of inappropriate buffers when calibrating pH meters.</p> <p>YM-94-80: Procurement procedure not in compliance with QARD requirements - data recorded was not explained as to its acceptability or unacceptability.</p> <p>YM-94-081: Procedure violation in scientific notebooks - the acceptability or unacceptability of data was not recorded.</p> <p>YM-94-082: Traceability of software requirements into the software design not performed during the design phase as required.</p>

**ATTACHMENT 2: RESULTS OF REVIEW OF FY-94 REPORTS OF DOE SURVEILLANCES WITH NO NRC OBSERVERS**

<u>REPORT NUMBER</u>	<u>ORG.</u>	<u>DATE</u>	<u>CORRECTIVE ACTION REQUESTS</u>
HQ-SR -94-02	M&O/VA	1/10-14/94	<p>HQ-94-004: Personnel performing quality affecting work prior to verification of education and experience.</p> <p>HQ-94-005: QA records being corrected without being re-authenticated and re-approved by the originating organization.</p> <p>HQ-94-006: Audit and surveillance reports do not contain all the necessary objective evidence to support the evaluations.</p> <p>HQ-94-007: User organizations not establishing procedures for controlling the use of software.</p> <p>HQ-94-008: Inadequate root cause determination and inadequate verification of corrective action.</p>

HQ-SR -94-04	M&O/VA	3/8-10/94	-NONE-
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**NOTE: THE FOLLOWING REPORT NUMBERS ARE PRECEDED WITH YMP-SR-:**

94-001	M&O/LV	10/11-14/93	-NONE-
94-002	RSN/NTS	10/5-11/2/93	-NONE-
94-003	REECO/NTS	10/7-15/93	-NONE-
94-004	USGS/CO	11/1-3/93	-NONE-
94-005	REECO/NTS	11/1-16/93	YM-94-011: Some forms were being signed as completed prior to actual completion. Forms do not have a space for test results to be annotated per procedure.
94-006	M&O/LV	11/22/93	-NONE-
94-007	USGS/CO	11/16-19/93	-NONE-
94-008	EG&G/LV	11/29/93	-NONE-
94-009	M&O/LV	11/3-8/93	-NONE-

94-010 REECO/NTS 11/9-30/93

YM-94-008: Failure to report water left in the tunnel or alcove as a consumed quantity per procedure.

YM-94-009: Procedures do not address requirements concerning water use for construction and operation.

94-011 M&O/LV 11/17-22/93

-NONE-

94-012 USGS/NTS 12/8/93

-NONE-

94-013 M&O/LV 12/13-30/93

YM-94-012: No objective evidence that the procedural requirements in AP-6.17Q for performing event tree analyses to support documentation for the addition of items important to safety have been met.

YM-94-013: QA records either not appropriately controlled or not identified per M&O QAP-6-1.

YM-94-014: No controls are in place to ensure that all structures, systems, and components and related activities are adequately evaluated as the design proceeds.

YM-94-015: Validation status of data not identified or tracked (per Quality Assurance and Description Document - QARD, DOE/RW-0333P) in the Waste Isolation Evaluation for the Determination of Importance Evaluation, Revision 6, for the Exploratory Studies Facility (ESF) Starter Tunnel Drill and Blast Section.

94-014 LANL & LLNL/NTS 12/6/93

-NONE-

94-015 REECO/NTS 12/13/93

-NONE-

94-016 RSN/LV 12/14/93

-NONE-

94-017 REECO/NTS 12/17/93

-NONE-

94-018 REECO/NTS 12/16/93

-NONE-

94-019 YMPO/NTS 12/20/93

-NONE-

94-020 REECO & RSN/NTS 1/4/94

-NONE-

94-021	M&O/VA	1/17-21/94	-NONE-
94-022	M&O/NTS	1/19-2/11/94	YM-94-019: Job package participants are not conforming with procedural requirements regarding the submittal of records.
94-023	REECO/NTS	1/21-2/25/94	YM-94-024: Missing calibration report, failure to identify hydraulic jack as testing equipment, and accuracy of pressure gauge not specified in procedure.
94-024	REECO/ LV & NTS	5/19/94	-NONE-
94-025	REECO/WA	2/2-4/94	-NONE-
94-026	M&O/LV	1/25-31/1994	-NONE-
94-027	M&O/LV	1/31-2/1/94	-NONE-
94-028	M&O/LV	2/7-27/94	YM-94-025: Failure of Yucca Mountain Project Organization QA group to use proper forms as required by procedure.  YM-94-026: Failure to process some QA Procedures in accordance with procedures.
94-029	M&O/LV	2/21-25/94	-NONE-
94-030	M&O/LV	2/(8-14)/94	YM-94-020: The review criteria specified in NLP-3-16 for the review of the TIDBITS computer program does not adequately describe the requirements necessary to ensure that the program is complete or adequate.
94-031	REECO/NTS	2/7/94	-NONE-
94-032	M&O/LV	4/11-12/94	-NONE-
94-033	M&O/LV	3/(7-18)/94	-NONE-
94-034	M&O/LV	2/24/94	YM-94-021: Inability of Field Change Control Board to meet the five-day processing time requirement for expedited and urgent Field Change Requests.
94-035	YMPO/LV	3/3-4/27/94	YM-94-33: Several findings regarding poor control, understanding, and use of tracers, fluids, and/or materials (TFMs).

YM-94-35: Technical Directive was not issued for the TFM activity performed by LANL, for the M&O to perform TFM coordination, or for EG&G database and reporting.

YM-94-36: TFMs are not controlled as technical data because they are not identified as such in the Technical Parameter Library.

YM-94-37: Several examples of inadequate measuring the use of TFMs and of not updating the database for ESF and Surface Based Testing activities.

YM-94-38: Several examples where TFM controls and limits were not specified.

94-036	REECO/WA	3/16-19/94	-NONE-
94-037	YMPO/NTS	3/21-4/4/94	YM-94-030: Revisions 6-9 of TPP-92-01 and revision 1 of TPP T-93-09 not sent to the local records center as required by AP-5.32Q.
			YM-94-031: Procedures AP-5.32Q and AP-5.21Q not in compliance with QARD record requirements.
94-038	M&O/LV	3/8-10/94	-NONE-
94-039	USGS/CO	3/15-17/94	YM-94-027: Procedural requirements for software management (QMP 3.03, revision 4) were not well implemented.
94-040	SNL & NCAR/CO	4/5-7/94	-NONE-
94-041	M&O/LV	3/22-23/94 & 4/12-15/94	-NONE-
94-042	USGS/NTS	3/8 & 15/94 & 4/21/94	-NONE-
94-043	USGS/NTS	3/9-17/94	-NONE-
94-044	YMPO/ LV & NTS	3/25/94-4/22/94	-NONE-
94-045	M&O/NC	4/25-29/94	94-OC-004: Verification of education was not completed prior to performing work subject to QARD requirements.

94-OV-021: M&O QAP-17-1, "Record Source Responsibilities for QA Records" and QAP-17-2, "Receipt and Handling of QA Records and Records Packages," do not meet QARD standards.

94-046 USGS/UNR 4/26-28/94 -NONE-

94-047 M&O/LV 6/8-15/94 -NONE-

94-048 M&O/NTS 5/18-19/94 -NONE-

94-049 YMSCO/LV 6/13/94 YM-94-042: Several identified deficiencies indicated that the training objectives as a result of the Yucca Mountain Site Characterization Office reorganization transition were not completely accomplished.

94-050 REECO/NTS 7/31-8/12/94 -NONE-

94-051 REECO/NTS 7/7-8/94 -NONE-

94-052 LLNL/CA 7/25/94 & 10/13/94 YM-94-77: A non-qualified Regulatory Information Base item was used in developing a data set and the status of the data set was identified as "QA"

YM-94-083: Existing technical data identified as qualified when actually the data were not qualified.

YM-94-084: Existing technical data identified as qualified when actually the data were not qualified.

YM-94-101: Unqualified data sets were identified as qualified on the associated Technical Data Information Form. This error was perpetuated into the Technical Data Catalog.

94-053: INCLUDED IN SURVEILLANCE NO. 94-052

94-054: INCLUDED IN SURVEILLANCE NO. 94-052

94-055 SNL/NER 9/15-16/94 -NONE-

94-056 REECO/LV 6/20-23/94 -NONE-

94-057 DELAYED; WILL BE PERFORMED IN 1995

94-058 YMSCO/LV 7/8-8/17/94 YM-95-01: Three Field Change Requests

- 6 -

(FCRs) had not received interim approval by QA as required.

YM-95-02: Some design related FCRs were not reviewed by the design organization's QA group

94-059	YMSCO/NTS	7/7-15/94	-NONE-
94-060	M&O/LV	7/18-22/94	-NONE-
94-061	DELAYED; BECAME 95-007		
94-062	DOE/NV	8/10-11/94	-NONE-
94-063	USGS/CO & T&MSS/LV	9/21-30/94 & 10/24-25/94	YM-95-003: Procedures do not adequately detail the processes used by USGS for the control of data.
94-064	M&O/VA	8/14-19/94	-NONE-
94-065	USGS/PA	8/18/94	-NONE-
94-066	M&O/LV	8/29-9/2/94	-NONE-
94-067	M&O/CA	9/19-22/94	-NONE-
94-068	DELAYED; BECAME 95-001		