



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

**JAN 18 1996**

Wesley E. Barnes, Project Manager, YMSCO, NV

ISSUANCE AND ACCEPTANCE OF CORRECTIVE ACTION EXTENSION OF DEFICIENCY REPORT (DR) YMQAD-96-D030 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION'S (YMQAD) SURVEILLANCE YMP-SR-94-052 (SCPB: N/A)

Reference: Ltr, Brocoum to Spence, dtd 1/8/96

Enclosed is DR YMQAD-96-D030 generated as a result of a YMQAD surveillance.

In accordance with the implementation of Administrative Procedures (AP) 16.1Q and AP 16.2Q, Corrective Action Request (CAR) YM-94-101 has been converted into a DR, specifically YMQAD-96-D030. Under direction of the Office of Quality Assurance, this conversion was necessary for this nonsignificant condition CAR as its resolution date extends beyond the end of the calendar year.

It will be necessary in future correspondence to refer to the new DR number in lieu of the original CAR number. Accordingly, CAR YM-94-101 is now considered closed.

In addition, we accept your request for an extension of completion of corrective action. Please note that finalization of the Yucca Mountain Site Characterization Office's position with the U.S. Nuclear Regulatory Commission regarding qualifying existing data, as identified in your extension request, is not related to this CAR and should not affect the schedule for timely completion of corrective action. Additionally, your corrective actions require in part that Yucca Mountain Administrative Procedure 3.1Q (the successor of Quality Assurance Procedure 3.5) be issued to address technical data requirements.

The new Remedial Action Completion and Corrective Action to Preclude Recurrence due dates are February 29, 1996. As the first request for extension on this DR, the new due date is accepted in accordance with AP 16.2Q, Revision 0.

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PDR WASTE  
WM-11 PDR

YMP-5

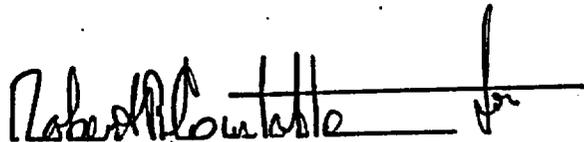
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Wesley E. Barnes

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Please be advised additional requests will be escalated through the Office of Civilian Radioactive Waste Management.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Mary G. McDaniel at 794-7592.



Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-950

## Enclosures:

1. DR YMQAD-96-D030
2. PR/DR Continuation Page

## cc w/encls:

- J. G. Spraul, NRC, Washington, DC
- S. W. Zimmerman, NWPO, Carson City, NV
- S. C. Stonebraker, M&O/TRW, Las Vegas, NV
- D. S. White, M&O/TRW, Las Vegas, NV
- D. E. Donovan, M&O/WCFS, Las Vegas, NV

## cc w/o encls:

- W. L. Belke, NRC, Las Vegas, NV
- M. G. McDaniel, YMQAD/QATSS, Las Vegas, NV
- A. W. Rabe, YMQAD/QATSS, Las Vegas, NV
- D. G. Sult, YMQAD/QATSS, Las Vegas, NV
- C. C. Warren, YMQAD/QATSS, Las Vegas, NV

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 Deficiency Report  
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**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document: QARD, Rev. 0, and YAP-SIII.3Q, Rev. 0	2 Related Report No. YMP-SR-94-052, CAR YM-94-101
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3 Responsible Organization: YMSCO	4 Discussed With: C. Newbury
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5 Requirement/Measurement Criteria:  
**Note: This DR is issued to supercede CAR YM-94-101 in order to implement the revised OCRWM Corrective Action Program.**

DOE/RW-0333P, QARD, Supplement III, Revision 0, Section 2.3.A states:  
"Data shall be identified to provide traceability, indicate usability,..."

YAP-SIII.3Q, Revision 0, Section 3.15 defines technical data as:  
"Technical data acquired or developed for the YMP under a Nuclear Regulatory Commission accepted quality assurance program or qualified in accordance with appropriate YMP procedure. Developed data cannot be classified as "Qualified" if derived from unqualified data sources."

6 Description of Condition:  
Contrary to the identified requirements, data sets have been classified as qualified when they were not qualified. This error was perpetuated in the Technical Data Catalog which contains a listing of all Yucca Mountain Technical Data and its status. Some of these data sets have been identified and documented in the following referenced CARs:

CAR YM-94-083 -  
The following LANL data are identified as qualified but were acquired or developed, or reference source data acquired or developed, prior to NRC acceptance of the QA program:

TDIF	300807	DTN	LA000000000026.001
TDIF	300933	DTN	LA000000000026.002
TDIF	300496	DTN	LA000000000011.001
TDIF	300449	DTN	LA000000000012.001
TDIF	301206	DTN	LA000000000012.002

(continued)

7 Initiator Mary G. McDaniel <i>Mary G. McDaniel</i> Date 1/11/96	9 QA Review Mary G. McDaniel <i>Mary G. McDaniel</i> Date 1/1/96
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10 Response Due Date N/A	11 QA Issuance Approval <i>Robert Blount</i> QAR (PR)/AOQAM (DR) Date 126-96
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12 Remedial Actions:  
See response to CAR YM-94-101

13 Remedial Action Response By: N/A Date	14 Remedial Action Due Date N/A Date
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15 Remedial Action Response Acceptance QAR N/A Date	16 PR Verification/Closure QAR N/A Date
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**DEFICIENCY REPORT**

**17 Recommended Actions:**

Determine if data, incorrectly identified as qualified, have been used to develop data or used in other quality-affecting activities (such as, scientific investigation, design, or performance assessment) and the product or output incorrectly identified as qualified or traceability back to the correct qualification status of the input not maintained. Evaluate impact and take appropriate corrective action. Correct any identified traceability issues.

This determination should be based on:

- 1) The determined extent of deficiencies identified in CARs YM-94-083, YM-94-084 and YM-94-077, and
- 2) Similar conditions that may exist with other affected organizations submitting data to the technical data management system or using such data.

**18 Investigative Actions:**

See response to CAR YM-94-101

**19 Root Cause Determination:**

N/A

**20 Action to Preclude Recurrence:**

See response to CAR YM-94-101

**21 Response by:**

N/A Date

**22 Corrective Action Completion Due Date:**

02/29/96

**23 Response Accepted**

QAR N/A Date

**24 Response Accepted**

AOQAM N/A Date

**25 Amended Response Accepted**

QAR Date

**26 Amended Response Accepted**

AOQAM Date

**27 Corrective Actions Verified**

QAR Date

**28 Closure Approved by:**

AOQAM Date

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PR/DR CONTINUATION PAGE

6 - Description of Condition (continued)

TDIF	301670	DTN	LA000000000053.001
TDIF	300235	DTN	LA000000000008.001

CAR YM-94-084 -

The following LLNL data are identified as qualified but were acquired or developed prior to NRC acceptance of the QA program:

TDIF	200186	LLLLYMP9011018.000
TDIF	200194	LLLLYMP9110169.000

CAR YM-94-077 -

Unqualified data (RIB, Item 1.1325, Rock Physical Properties, a. Rock Density) was used as an input to data package DTN #SNT0112209300.002, "Data Transmittal Package for Design Support Analysis North Ramp Design Packages 2C (Revision 1)" and the data output from this package was labeled as qualified. The traceability back to the unqualified input was not maintained.

17 - Recommended Actions (continued)

If any data have been qualified, ensure traceability from the qualification documentation to the associated data, appropriate reference to the qualification documentation within the technical data management system, and retrievability of the qualification documentation within the Records Management System.

NOTE: The record package for DTN LA000000000011.001 included in an excerpt from a document addressing erosion rates at Yucca Mountain, Nevada. This excerpt addresses qualification of data and refers to a technical assessment and peer review. Further investigation located, from the records system, what appears to be the qualification documentation for this data, however, locating these records was difficult and accomplished by referrals from personnel involved in the activities. What other data this documentation may apply to has not been determined.

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               QA

**CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)**

Conditions adverse to quality identified in this CAR are transferred to DR YMQAD-96-D030 in order to implement the revised OCRWM Corrective Action Program. This CAR is considered closed.

Mary A. McSamuel  
QAR

1/11/96  
Date

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**CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)**