



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

FEB 27 1996

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 DEFICIENCY REPORTS (DR) YMQAD-96-D040 THROUGH  
 YMQAD-96-D042 RESULTING FROM U.S. DEPARTMENT OF ENERGY  
 HEADQUARTERS QUALITY ASSURANCE DIVISION'S (HQQAD) AUDIT  
 HQ-ARC-96-01 (SCPB: N/A)

Enclosed are DRs YMQAD-96-D040 through YMQAD-96-D042 generated as  
 a result of HQQAD Audit HQ-ARC-96-01.

Please identify the corrective actions to be taken and  
 implemented to correct the deficiencies. PR/DR Continuation  
 Pages have been provided. Send the originals of your  
 responses to Deborah Sult, YMQAD/QATSS, 101 Convention Center  
 Drive, Suite 640, Las Vegas, Nevada 89109. Responses to the  
 DRs are due 20 working days from issuance. Extensions to due  
 dates must be requested in writing, with appropriate  
 justification, prior to the due dates.

If you have any questions, please contact either Robert B.  
 Constable at 794-7945 or Charles C. Warren at 794-7248.

Richard E. Spence, Director  
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-1221

Enclosures:

1. DRs YMQAD-96-D040 through  
 YMQAD-96-D042
2. PR/DR Continuation Pages

9603060218 960227  
 PDR WASTE  
 WM-11 PDR

060013

NH03  
 102.7  
 WM-11

L. Dale Foust

-2-

FEB 27 1996

cc w/encls:

T. A. Wood, HQ (RW-14) FORS  
R. L. Strickler, M&O, Vienna, VA  
R. P. Ruth, M&O, Las Vegas, NV  
J. G. Spraul, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV

cc w/o encls:

W. L. Belke, NRC, Las Vegas, NV  
J. T. Schmit, YMQAD/QATSS, Las Vegas, NV  
D. G. Sult, YMQAD/QATSS, Las Vegas, NV  
C. C. Warren, YMQAD/QATSS, Las Vegas, NV

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

8  Performance Report  
 Deficiency Report  
NO. YMQAD-96-D040  
PAGE 1 OF 2  
QA: L

**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document:  
NWI-SMF-005Q, Rev. 0

2 Related Report No.  
Audit Report HQ-ARC-96-01

3 Responsible Organization:  
DS & SM

4 Discussed With:  
Robert Spencer

5 Requirement/Measurement Criteria:  
Section 3.6, "M&TE Calibration Notice System," Step 1 requires the following of the M&TE Custodian:

Issue written notices to responsible DS & SM Section Managers at least two months prior to the calibration due date of M&TE/OE only. (Notices are to be sent by the 25th day of each month.)

6 Description of Condition:

The M&TE Custodian has not issued written notices to responsible DS & SM Section Managers prior to the calibration date of some M&TE/OE such as balances and recording thermometers. In addition, the notices that have been issued for other M&TE/OE were not issued at least two months prior to the calibration due date as required.

7 Initiator C.C. Warren  
C. C. Warren Date 02/15/96

9 QA Review C.C. Warren  
QAR C. C. Warren Date 02/19/96

10 Response Due Date  
20 working days from issuance

11 QA Issuance Approval [Signature]  
QAR (PRI)/AUCAM (DR) Date 2-26-96

12 Remedial Actions:

13 Remedial Action Response By:  
Date

14 Remedial Action Due Date  
Date

15 Remedial Action Response Acceptance  
QAR Date

16 PR Verification/Closure  
QAR Date

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

8  
DR NO. YMQAD-96-D040  
PAGE 2 OF 2  
QA: L

**DEFICIENCY REPORT**

**17 Recommended Actions:**

1. Evaluate the impact of improper notification for M&TE/OE coming due for calibration to assure equipment was not in use after the date calibration was due.
2. If the notification system is to be modified, make necessary changes to procedure(s) and perform training of personnel as corrective action to preclude recurrence.
3. If notification system is to remain as specified in procedures, take appropriate action to preclude recurrence of procedural noncompliance.

**18 Investigative Actions:**

**19 Root Cause Determination:**

**20 Action to Preclude Recurrence:**

**21 Response by:**

Date

**22 Corrective Action Completion Due Date:**

**23 Response Accepted**

QAR

Date

**24 Response Accepted**

AOQAM

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

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

8  Performance Report  
 Deficiency Report  
NO. YMQAD-96-D041  
PAGE 1 OF 2  
QA: L

**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document:  
DOE/RW-0333P QARD

2 Related Report No.  
HQ-ARC-96-01

3 Responsible Organization:  
M&O

4 Discussed With:  
Wes Pugmire (M&O QA), Larry Croft, Dave Van Bibber (EFPD)

5 Requirement/Measurement Criteria:  
Appendix C.2.3 states "nonconforming products resulting from activities specified in work controlling documents (such as job packages or work requests) shall be documented, evaluated, identified, segregated, and dispositioned in accordance with Section 15.0, Nonconformances, of this QARD."

6 Description of Condition:

The M&O has issued procedures which do not require nonconforming products to be processed in accordance with Section 15.0 of the QARD (e.g. in accordance with YAP15.1Q). Procedures QAP 12-1, Rev 2 and NLP-III-4 direct one to AP 16.1Q (and/or AP16.2Q) for nonconforming products rather than YAP15.1Q. Additionally, the M&O has processed changes to NWIs (subtier implementation procedures) to delete references to YAP 15.1 Q and instead reference the Section 16 procedures in violation of QA program requirements.

7 Initiated  
*K.O. Gilkerson*  
K.O. Gilkerson Date 02/16/96

9 QA Review  
*J.S. Martin*  
QAR *J.T. Schmit* Date 2-11-96

10 Response Due Date  
20 working days from issuance

11 QA Issuance Approval  
*[Signature]*  
QAR (PR)/AOCAM (DR) Date 2.26.96

12 Remedial Actions:

13 Remedial Action Response By:  
Date

14 Remedial Action Due Date  
Date

15 Remedial Action Response Acceptance  
QAR Date

16 PR Verification/Closure  
QAR Date

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

8  
DR NO. YMQAD-96-D041  
PAGE 2 OF 2  
QA: L

**DEFICIENCY REPORT**

**17 Recommended Actions:**

Revise M&O procedures as necessary to comply with QARD.

**18 Investigative Actions:**

**19 Root Cause Determination:**

**20 Action to Preclude Recurrence:**

21 Response by:  Date	22 Corrective Action Completion Due Date:
23 Response Accepted  QAR Date	24 Response Accepted  AOQAM 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

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

8  Performance Report  
 Deficiency Report  
 NO. YMQAD-96-D042  
 PAGE 1 OF 3  
 QA: L

**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document: OCRWM QARD DOE/RW-0333P, Revision 5	2 Related Report No. HQ-ARC-96-01, CAR YM-95-028
--	---

3 Responsible Organization: CRWMS M&O	4 Discussed With: A. Segrest
--	---------------------------------

5 Requirement/Measurement Criteria:  
QARD Section 17.0

Paragraph 17.2.2.D states in part: "... Records shall be considered QA records when stamped, initialed, or signed and dated as complete."

QAP-17-1, Rev. 4 (Record Source Responsibilities for Inclusionary Records), Para. 5.4.2.E.1 states: "The Record Source shall: submit original or copies of individual inclusionary records, records package segments, and records packages required by the procedures governing an activity, hardcopy and unbound whenever possible, to the RPC no later than 20 working days after completion (e.g., upon final approval signature) for the Nevada Site...."

6 Description of Condition:  
Contrary to the above requirements, QA records were not submitted to the RPC within 20 working days after completion.

Examples:

1. An Impact Review Action Notice requesting review of a letter from Hollins to Segrest (per NLP-3-26, Rev. 0) was completed 8-11-95 and had not been submitted to the RPC as of 2/14/96.
2. Two (2) Title III Documentation Instructions (DI# BABEA0000-01717-5600-00001, Rev .0 and DI# BABEA0000-01717-5600-00002, Rev .0) were completed 11-3-95 and had not been submitted to the RPC as of 2/14/96.
3. Engineering Change Requests No. E96-0035, E96-0036, E96-0037, and E96-0038 were completed 12/21/95 and submitted to the RPC 2/6/96. (Continued)

7 Initiator J. T. Schmit <i>J. T. Schmit</i> Date 02/16/96	9 QA Review QAR J. T. Schmit <i>J. T. Schmit</i> Date 02/16/96
---	---

10 Response Due Date <i>3-19-96</i> <b>20 WORKING DAYS FROM ISSUANCE</b>	11 QA Issuance Approval <i>[Signature]</i> QAR (PRI)/AOCAM (DR). Date <i>2-26-96</i>
---	--

12 Remedial Actions:

13 Remedial Action Response By: Date	14 Remedial Action Due Date Date
15 Remedial Action Response Acceptance QAR Date	16 PR Verification/Closure QAR Date

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

8  Performance Report  
 Deficiency Report

NO. YMOAD-96-D042  
PAGE 2 OF 3  
QA: L

PR/DR CONTINUATION PAGE

6 Description of Condition

Examples (cont'd)

4. QAP-17-6, Rev. 3, (Protection, Retrieval and Retention of Inclusionary Records) was completed and made effective 8/21/95, and was submitted to the RPC on 2/14/96.
5. B00000000-01717-4600-00057, Rev. 01, "Technical Document Preparation Plan for the MGDS Advanced Conceptual Design (Revised) Report" was approved 1/15/96 and had not been submitted to the RPC as of 2/15/96.
6. Borehole Access Request/Completion Report for USW-WT10 was completed 11/13/95 and had not been submitted to the RPC as of 2/14/96.
7. Borehole Access Request/Completion Reports dating back to 3/30/93 were submitted to the RPC on Transmittal No. DRC-164 dated 2/9/96.

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

**DEFICIENCY REPORT**

**17 Recommended Actions:**

1. Submit all past due records to the RPC in accordance with QAP-17-1, Rev. 4.
2. Revise PAR for QAP-17-1, Rev. 4, dated 8-7-95 to eliminate change to Para. 5.4.5.A.10, which is in conflict with QARD Section 17.2.2.D.

**18 Investigative Actions:**

**19 Root Cause Determination:**

**20 Action to Preclude Recurrence:**

<b>21 Response by:</b>  Date	<b>22 Corrective Action Completion Due Date:</b>
<b>23 Response Accepted</b>  QAR Date	<b>24 Response Accepted</b>  AOQAM Date
<b>25 Amended Response Accepted</b>  QAR Date	<b>26 Amended Response Accepted</b>  AOQAM Date
<b>27 Corrective Actions Verified</b>  QAR Date	<b>28 Closure Approved by:</b>  AOQAM Date

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

8  Performance Report  
 Deficiency Report

NO. OF  
PAGE OF  
QA: L

PR/DR CONTINUATION PAGE

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

8  Performance Report  
 Deficiency Report

NO. OF  
PAGE OF  
QA: L

PR/DR CONTINUATION PAGE