



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

OCT 25 1995

L. Dale Foust  
Technical Project Officer  
for Yucca Mountain Site  
Characterization Project  
TRW Environmental Safety Systems, Inc.  
101 Convention Center Drive, Suite P-110  
Las Vegas, NV 89109

EVALUATION OF RESPONSES TO DEFICIENCY REPORTS (DR) YMQAD-95-D010  
AND YMQAD-95-D012 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE  
DIVISION'S (YMQAD) AUDIT YM-ARP-95-19 OF SANDIA NATIONAL  
LABORATORIES (SCPB: N/A)

The YMQAD staff has evaluated the responses to DRs YMQAD-95-D010  
and YMQAD-95-D012. The responses have been determined to be  
satisfactory. Verification of completion of the remedial actions  
will be performed after the effective date provided. Any  
extension to this date must be requested in writing, with  
appropriate justification, prior to the date. Please send a copy  
of extension requests to Deborah Sult, YMQAD/QATSS,  
101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109.

If you have any questions, please contact either Robert B.  
Constable at 794-7945 or Richard L. Weeks at 794-7853.

*Robert B. Constable*

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-286

Enclosures:  
DR YMQAD-95-D010 and  
YMQAD-95-D012

cc w/encl:

J. G. Spraul, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
T. A. Wood, HQ (RW-14) FORS  
R. L. Strickler, M&O, Vienna, VA  
Richard Jiu, M&O, Las Vegas, NV  
R. P. Ruth, M&O, Las Vegas, NV  
R. R. Richards, SNL, Albuquerque, NM, M/S 1333

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV  
D. G. Sult, YMQAD/QATSS, Las Vegas, NV

YMP-5

030016  
951103027B 951025  
PDR WASTE PDR  
WM-11

102.7  
WM-11  
N403/1

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

8  Performance Report  
 Deficiency Report  
NO. YM1040-95-D-010  
PAGE 1 OF 2  
QA: L

**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document: QARD, Revision 4	2 Related Report No. YM-ARP-95-19
---	--------------------------------------

3 Responsible Organization: M&O/SNL	4 Discussed With: Larry Costin
--	-----------------------------------

5 Requirement/Measurement Criteria:  
Section 2.2.2, B., 3. states, "The system shall provide positive control over external interfaces between affected organizations and internal interfaces within the organization. An interface exists when one organization prescribes an activity or requirement to, or shares an activity or requirement with, another organization."

Section 5.2 states, "Work shall be performed according to controlled implementing documents."

Section 2.2.4, D. states, "Planning shall be performed to ensure work is accomplished under suitably controlled conditions. Planning elements shall include, as appropriate:  
D. Identification and selective application, or development, of appropriate implementing documents."

6 Description of Condition:  
Contrary to the above requirements, the process that controlled the development of, "Design Support Analyses:North Ramp Design Package 2C", Revision 1, which was utilized by the M&O as design input, is indeterminate and therefore, it is not possible to evaluate compliance to an implementing procedure.

Discussion:Work Agreements 130 Revision 01 and 110 Revision 01 stated that the design analyses report referenced above would be issued as a Sandia Letter Report. During interviews with SNL personnel it was stated that a SAND report number had been issued and subsequently withdrawn for this report. Finally, the report was submitted to the Technical Data Base under TDIF No. 303124. Since the report was not issued as either an SLTR or SAND report, there is no documented acceptance criteria for acceptance of the report. Additionally, the WA 's that controlled this analyses were never revised to correctly identify the product that was generated.

7 Initiator <i>John Pelletier</i> John Pelletier Date 08/31/95	9 QA Review <i>Richard L. Weeks</i> Richard L. Weeks Date 08/31/95
10 Response Due Date 20 Days after issuance	11 QA Issuance Approval <i>[Signature]</i> QAR (PR)/AQQAM (DR) Date 9.5.95

12 Remedial Actions:  
see continuation page

13 Remedial Action Response By: <i>Michael C. Bradley</i> Michael C. Bradley Date 10/6/95	14 Remedial Action Due Date N/A Date
15 Remedial Action Response Acceptance <i>Richard L. Weeks</i> Richard L. Weeks Date 10/9/95	16 PR Verification/Closure N/A Date

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

8  Performance Report  
 Deficiency Report  
 NO. Ym-95-D-010  
 PAGE OF  
 QA: L

**PR/DR CONTINUATION PAGE**

Corrective Action Response for Deficiency Report YMQAD-D-010

**12. Remedial Action:** There is considerable correspondence in evidence within the Task Files to document the interfaces that resulted in the final report being submitted to the Technical Data Base under TDIF No. 303124. There are no remedial actions that would have value added at this point in time.

**18. Investigative Action:**

1. A SNL YMP Quality Assurance staff member will research all closed Work Agreements by wbs number (a) to identify those technical documents generated for design information and (b) investigate if the stated deliverable in the Work Agreement was produced, to determine extent of deficiency. If other deficiencies are found as a result of the review, a plan for further corrective actions and a statement of impact to quality will be submitted as an amendment to this response.

2. A SNL YMP Quality Assurance staff member will review all open Work Agreements (a) to identify if any open work agreements are utilized for the development of design information, (b) to identify what products will be generated, and (c) to identify acceptance criteria. If other deficiencies are found as a result of the review, a plan for further corrective actions and a statement of impact to quality will be submitted as an amendment to this response.

**19. Root Cause:**

The Task Leader viewed the Work Agreement as a planning document instead of as a controlling document. The Work Agreement was not updated as decisions to control the work changed.

**20. Actions to Prevent Recurrence:**

Computer Based Training (CBT) for QAIP 1-5 is being developed as part of the actions to prevent recurrence on YM-95-014. The CBT training on QAIP 1-5 will address when a work agreement needs to be updated to control the work.

**21. Overall Responsible Individual:**

*Michael Brady*  
 Micheale Brady

22.	<u>Action</u> <u>para. above</u>	<u>Responsible</u> <u>Party</u>	<u>Anticipated</u> <u>Completion Date</u>
	18.	Don Wrobel	Nov. 27, 1995
	20.	Jud Blickley	Nov. 20, 1995

*initials Radioactive Waste*

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

8  Performance Report  
 Deficiency Report  
NO. YMRAD-95-D-012  
PAGE 1 OF 2  
QA: L

**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document: YAP-SIII.3Q, Revision 0	2 Related Report No. YM-ARP-95-19
--	--------------------------------------

3 Responsible Organization: M&O/SNL	4 Discussed With: Michael Brady
--	------------------------------------

5 Requirement/Measurement Criteria:

Section 5.2.2, NOTE states, Preliminary data provided to other YMP investigators are to be transferred under a cover letter, which includes the following statements; "The data provided herein have not received complete technical and quality checks and, therefore, are considered to be preliminary. These data are for information only and cannot be used for licensing activities until recorded in the ATDT and all technical and quality checks are complete." In addition, all data sheets are to be stamped "PRELIMINARY-INFORMATION ONLY".

6 Description of Condition:

Contrary to the above requirement, there is no objective evidence that technical data provided to the M&O for scoping analyses studies for the "Design Support Analyses: North Ramp Design Package 2C" was transferred to the M&O in compliance with the above stated requirement. Specifically, preliminary data was transferred to the M&O and subsequently utilized as design input without including the following statements, "The data provided herein have not received complete technical and quality checks and, therefore, are considered to be preliminary. These data are for information only and cannot be used for licensing activities until recorded in the ATDT and all technical and quality checks are complete. In addition, all data sheets are to be stamped "PRELIMINARY-INFORMATION ONLY." Additionally, corrections were made to the technical data by SNL personnel after the technical data was sent to the M&O. The M&O was not made aware of the corrections and continued to use the incorrect data throughout Revision 2 of the scoping analyses.

7 Initiator <i>John Pelletier</i> John Pelletier	<i>8/31/95</i> Date 08/31/95	9 QA Review <i>R. L. Weeks</i> QAR Richard L. Weeks	<i>8/31/95</i> Date 08/31/95
---	---------------------------------	--	---------------------------------

10 Response Due Date 20 days after issuance	11 QA Issuance Approval <i>Richard L. Weeks</i> for QAR (PRI)/AQQAM (DRI)	Date <i>9.5.95</i>
--	---	--------------------

12 Remedial Actions:  
*see continuation page*

13 Remedial Action Response By: <i>Michael C. Brady</i> Date <i>10/6/95</i>	14 Remedial Action Due Date <i>N/A</i> Date
---	---

15 Remedial Action Response/Acceptance QAR <i>Richard L. Weeks</i> Date <i>10/9/95</i>	16 PR Verification/Closure QAR <i>N/A</i> Date
---	---

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

8  Performance Report  
 Deficiency Report  
 NO. YM-95-D-012  
 PAGE 2 OF  
 QA: L

**PR/DR CONTINUATION PAGE**

**Corrective Action Response for Deficiency Report YMQAD-95-D-012**

12. Remedial Action: The response to YMQAD-95-D-011 commits the M&O A/E organization to requesting the data (contained in TDIF 303124, Rev. 1) associated with the condition reported in this DR from the TDB using YAP-SIII.2.Q. In the response to YMQAD-95-D-013, the M&O A/E organization concludes that "An evaluation of the consequences of initially using preliminary data concluded that there was no impact on the results of the analysis". No further remedial action is considered necessary.

18. Investigative Action:

1. SNL will request that Agapito Associates examine outgoing correspondence relating to WA 130 "Design Package 2C Support" to determine if other cases exist wherein preliminary data was forwarded to the M&O prior to SNL submitting a TDIF.
2. SNL will investigate SNL work performed under Work Agreements 110 & 114 to determine if interfaces with the M&O provided "preliminary-data".
3. If other deficiencies are found as a result of these examinations (18.1 & 18.2), a plan for further corrective actions and a statement of impact to quality will be submitted as an amendment to this response.

19. Root Cause: The contractor was aware of the requirement. Under the conditions that the recipient of the data knew that the information was incomplete and preliminary and the submittal was remarkably casual, the contractor did not mark the information preliminary. This was an error of omission.

20. Actions to Prevent Recurrence:

The SNL Lab Lead will draft a memorandum to staff members including contractors describing this incident and emphasizing the importance of clearly identifying the status of information provided to other M&O and DOE participants.

Training being developed for CAR No. YM-95-14 to improve staff awareness and utilization of WA's as controlling documents, will clearly identify that the issue of interface control should be routinely addressed and requirements for the trainee to us: YAP SIII.3Q are clearly identified when appropriate.

21. Overall Responsible Individual: Michaele C. Brady

*Michael C. Brady*  
10/6/95

22. Action para. above	Responsible Party	Anticipated Completion Date
18.1 to 18.3	Eric Ryder	Nov. 27, 1995
20.1	Michaele C. Brady	Nov. 1, 1995