



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

JUN 03 1996

L. Dale Foust
Technical Project Officer
for Yucca Mountain
Site Characterization Project
TRW Environmental Safety Systems, Inc.
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Las Vegas, NV 89109

ISSUANCE OF SURVEILLANCE RECORD YMP-SR-96-011 RESULTING FROM
YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION'S (YMQAD) SURVEILLANCE
OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT
AND OPERATING CONTRACTOR (CRWMS M&O) DESIGN (SCPb: N/A)

Enclosed is the record of Surveillance YMP-SR-96-011 conducted
by the YMQAD at the CRWMS M&O Design facilities in the Bank of
America Building, Las Vegas, Nevada, and the Yucca Mountain Site,
Nevada, April 22, 1996 through May 15, 1996.

The purpose of the surveillance was to determine and verify that
the process for controlling changes to design requirements,
resulting from dispositioning Nonconformance Reports "Use-As-Is"
and "Repair," meet applicable procedure and Quality Assurance
Requirements and Description document requirements.

Two Deficiency Reports (DR) were issued as a result of this
surveillance. Responses to the DRs, which were transmitted via
separate letter, are due by the date indicated in Block 10 of the
DRs.

This surveillance is considered completed and closed as of the
date of this letter. A response to this surveillance record is
not required; however, the open DRs will continue to be tracked
until they are closed to the satisfaction of the Quality
Assurance Representative and the Director, Office of Quality
Assurance.

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PDR WASTE
WM-11 PDR

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102.7
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JUN 03 1996

L. Dale Foust

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If you have any questions, please contact either Mario R. Diaz at (702) 794-1489 or Patout H. Cotter at (702) 794-1332.



Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:MRD-1871

Enclosure:
Surveillance Record
YMP-SR-96-011

cc w/encl:

D. A. Dreyfus, HQ (RW-1) FORS
R. W. Clark, HQ (RW-3.1) FORS
T. A. Wood, HQ (RW-14) FORS
C. J. Henkel, NEI, Washington, DC
J. G. Spraul, NRC, Washington, DC
W. L. Belke, NRC, Las Vegas, NV
R. R. Loux, NWPO, Carson City, NV
Cyril Schank, Churchill County Commission, Fallon, NV
D. A. Bechtel, Clark County Comprehensive, Las Vegas, NV
J. D. Hoffman, Esmeralda County, Goldfield, NV
Eureka County Board of Commissioners, Eureka, NV
Lander County Board of Commissioners, Battle Mountain, NV
V. E. Poe, Mineral County, Hawthorne, NV
Wayne Cameron, White Pine County, Ely, NV
B. R. Mettam, County of Inyo, Independence, CA
Mifflin and Associates, Las Vegas, NV
M. J. Clevenger, M&O/LANL, Los Alamos, NM
Donald Mangold, M&O/LBNL, Berkeley, CA
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J. D. Christensen, M&O, Las Vegas, NV
R. P. Ruth, M&O, Las Vegas, NV
J. W. Willis, M&O, Las Vegas, NV
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Records Processing Center

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

QUALITY ASSURANCE SURVEILLANCE RECORD

SURVEILLANCE DATA

¹ORGANIZATION/LOCATION:
Civilian Radioactive Waste
Management System
Management and Operating
Contractor (CRWMS M&O)
Design/Yucca Mountain Site and
Las Vegas, Nevada

²SUBJECT: Dispositioning of "Use-As-Is"
and "Repair" Nonconformance Reports
(NCR)

³DATE: 4/22/96 - 5/15/96

⁴SURVEILLANCE OBJECTIVE: To determine and verify that the process for controlling changes to design requirements resulting from dispositioning NCRs "Use-As-Is" and "Repair" meet applicable procedure and Quality Assurance Requirements and Description (QARD) requirements.

⁵SURVEILLANCE SCOPE: The scope of this surveillance, to review NCRs dispositioned "Use-As-Is" and "Repair," and implementing procedures to verify that implementation of QARD and Yucca Mountain Administrative Procedure (YAP) 15.1Q requirements is adequate and effective.

⁶SURVEILLANCE TEAM:
Team Leader:

Patout H. Cotter

Additional Team Members:

N/A

⁷PREPARED BY:

Patout H. Cotter 5/31/96

Surveillance Team Leader Date

⁸CONCURRENCE:

N/A

QA Division Director

Date

SURVEILLANCE RESULTS

⁹BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:

See Page(s) 2 & 3

¹⁰SURVEILLANCE CONCLUSIONS:

See Page(s) 3 & 4

¹¹COMPLETED BY:

P. H. Cotter 5/31/96
Surveillance Team Leader Date

¹²APPROVED BY:

for [Signature] 6-3-96
QA Division Director Date

Block 9 (continued) BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:

From April 22, 1996 through May 15, 1996, a surveillance was performed (not continuous but on a part-time basis) of the CRWMS M&O Design organization at the Yucca Mountain Site and their offices in the Bank of America Building, Las Vegas, Nevada. The objective of this surveillance was to verify that the process for controlling changes in design requirements resulting from NCRs dispositioned "Use-As-Is" and "Repair" were in compliance with requirements listed below:

QARD, Revision 5, Section 15, "Nonconformances," Paragraph 15.2.4, "Disposition of Nonconforming Items"

1) Dispositions and technical justifications are documented.

All of the NCRs reviewed documented dispositions and technical justifications.

2) Items that do not meet original design requirements that are dispositioned "Use-As-Is" or "Repair" are subject to design control measures commensurate with those applied to the original design.

The requirement to have design control measures (the "what") was identified, but the work process (the "how to") was not described in the implementing procedures identified in the QARD requirements matrix. (See Block 10, Deficiency Report (DR)-Yucca Mountain Quality Assurance Division (YMQAD)-96-D061.)

3) Dispositions identify if the specifying document requires changes.

Some of the NCRs reviewed do not identify if the specifying document will require change or not. (See Block 10, DR-YMQAD-96-D060.)

YAP 15.1Q, Revision 2, Interim Change Notice (ICN) 1, "Control of Nonconformances"

4) The dispositioner for "Use-As-Is" dispositions verifies that affected drawings and specifications are annotated to reference "Use-As-Is" disposition NCRs.

Some of the NCRs reviewed identified applicable Engineering Change Requests (ECR) and others, which were "one time only," did not identify how the applicable document would be annotated. (See Block 10, DR-YMQAD-96-D060.)

5) The dispositioner indicates in the technical justification if the "Use-As-Is" disposition is a one-time exception to the approved drawings and/or specifications and drawings and/or specification are not revised.

Some of the NCRs reviewed did not identify that the disposition was a one-time exception. (See Block 10, DR-YMQAD-96-D060.)

The following documents were examined to determine compliance with the requirements identified on the previous page:

NCRs

Yucca Mountain Site Characterization Office (YMSCO) 95-0052, 0065, 0076, 0081, 0100, 0119, 0120, 0121, 0122, 0132, 0135, 0137, 0143, 0150, 0152, 0155, 0156, 0157, 0158, 0162

Procedures

Nevada Line Procedure (NLP) 3.10, Revision 7, "Preparation of Changes to Engineering Drawings and Specifications"

Quality Assurance Procedure (QAP) 3-8, Revision 6, "Specifications"

QAP 3-9, Revision 6, "Design Analysis"

QAP 3-10, Revision 6, "Engineering Drawings"

QAP 3-0, Revision 4, "Design Control Process"

QAP 3-25, Revision 2, "Configuration/Change Control"

YAP 15.1Q, Revision 2, ICN 1, "Control of Nonconformances"

The following CRWMS M&O individuals were interviewed or contacted during the course of this surveillance:

C. R. Garrett, Lead, Title III Design
R. A. Skorseth, Engineer, Title III Design
R. Bennett, Quality Control Supervisor, Construction
W. J. Glasser, Manager, Quality Assurance (QA) Construction
O. J. Gilstrap, Manager, Quality Engineering
J. W. Willis, QA Manager, Nevada
G. Heaney, Engineer, Title III Design
A. M. Segrest, Manager, Mined Geologic Disposal System
D. J. Rogers, Supervisor, Subsurface Design
J. J. Clark, Support Staff Supervisor
J. L. Naaf, Manager, Exploratory Studies Facility Design
R. L. Howard, Engineer, Office of Product Integrity
J. Bailey, Deputy Operations Manager

Block 10 (continued) SURVEILLANCE CONCLUSIONS:

Based on review of NCRs; implementing procedures; interviews with project personnel; and the issuance of two deficiency reports, it was determined that the adequacy and effectiveness of implementation of the quality assurance program requirements for dispositioning of "Use-As-Is" and "Repair" NCRs in accordance with the requirements of the QARD and YAP 15.1Q is marginally effective.

DR-YMQAD-96-D060

Contrary to the requirements of YAP 15.1Q, Revision 2, ICN 1, Paragraphs 5.2.2 h), Note, and 6.1.7, three NCRs did not indicate "Use-As Is" as a one-time exception to the approved drawings and/or specifications, and two did not identify the applicable ECR.

DR-YMQAD-96-D061

Contrary to the QARD, Revision 5, Section 2, Paragraph 2.2.1, requirement that implementing documents translate QARD requirements (design control measures) into work processes, the work process for controlling changes to design requirements related to NCRs dispositions "Use-As-Is" one-time exceptions and "Repair" is not documented in an implementing procedure. Also, the present QARD requirements matrix does not correctly identify where the QARD, Revision 5, Section 2, Paragraphs 2.2.1c and 2.2.1c.1, requirements are directly addressed in a CRWMS M&O implementing procedure.