



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

OCT 11 1995

Wesley E. Barnes, Project Manager, YMSCO, NV

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF CORRECTIVE ACTION REQUEST (CAR) YM-95-048 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION'S (YMQAD) AUDIT YM-ARP-95-13 (SCPB: N/A)

The YMQAD staff has verified the corrective action to CAR YM-95-048 and determined the results to be satisfactory. As a result, the CAR is considered closed.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Daniel A. Klimas at 794-7696.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-178

Enclosure:
CAR YM-95-048

cc w/encl:

J. G. Spraul, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
S. C. Stonebraker, M&O, Las Vegas, NV
D. S. White, M&O, Las Vegas, NV
M. W. Smith, YMSCO, NV

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV
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RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.8. CAR NO. YM-95-048
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CORRECTIVE ACTION REQUEST

1. CONTROLLING DOCUMENT:

YAP 2.6Q

2. RELATED REPORT NO.:

YM-ARP-95-13

3. RESPONSIBLE ORGANIZATION:

YMSCO

4. DISCUSSED WITH:

Bob Barton

5. REQUIREMENT:

Para 5.1.1a, states in part, "The AM/Director assigns a preparer to develop Participant Planning Sheets (PPS) to include a Statement of Work, Determination of Quality Affecting work and application of QA Control (Grading); the identification of technical and QA requirements for work to be quality affecting..."

6. ADVERSE CONDITION:

Contrary to the above, PPSs issued to Lawrence Berkeley Laboratory (LBL) identify Quality Affecting scopes of work with QARD applicability. However, LBL is not on the Office of Civilian Radioactive Waste Management Qualified Suppliers List (QSL) and the intent is to perform work under memorandum of agreements (MOAs) using USGS, LANL, etc., approved QA Program/Procedures. Since the PPSs are issued directly to LBL, there is no documented objective evidence that directs LBL to perform QA affecting work under the existing MOAs for specific work scopes. Deliverables from LBL do not identify the QA Program used to perform work.

EXAMPLE PPSs REVIEWED:

1.2.3.11.2 LBL Surface-Based Geophysical Testing

1.2.3.3.1.2.8 LBL Fluid Flow in Unsaturated Zone Fractured Rock

LBL Letter of April 28, 1995 for deliverables for WBS 1.2.3.11.2, Milestones OBB02C and OBB03C, states LBL followed appropriate QA Procedures. However, the program/procedures followed is not discernible.

9. Does a Significant Condition

Adverse to Quality exist? ☐ Yes ☒ NoIf Yes, Check One: ☐ A ☐ B ☐ C ☐ D ☐ E

10. Does a stop work condition exist?

☐ Yes ☒ No; If Yes, Attach copy of SWOIf Yes, Check One: ☐ A ☐ B ☐ C

13. Response Due Date:

20 working days
from issuance11. Required Actions: ☒ Remedial ☒ Extent of Deficiency ☒ Preclude Recurrence ☐ Root Cause Determination

12. Recommended Actions:

1. The project office should initiate documentation that provides LBL direction regarding the applicable QA Program/Procedures to be followed until LBL's QA Program is approved.

2. Determine the QA Program used for deliverables received to date and evaluate any impact on the deliverable.

7. Initiator

Walter R. Coutier *Walter R. Coutier* 4/26/95

14. Issuance Approved by

QADD *[Signature]* Date 6-28-95

15. Response Accepted

QAR *Frank [Signature]* Date 8/8/95

16. Response Accepted

QADD *[Signature]* Date 8-11-95

17. Amended Response Accepted

QAR Date

18. Amended Response Accepted

QADD Date

19. Corrective Actions Verified

QAR *Don [Signature]* Date 10-4-95

20. Closure Approved by

QADD *[Signature]* Date 10-10-95

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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

RESPONSE TO CAR YM-95-048

This response is based on the YMQAD position that all Affected Organizations (AOs) work to a single Office of Civilian Radioactive Waste Management (OCRWM) QA Program, and that each AO must prepare implementing procedures to control their scope of work in accordance with QARD requirements.

This deficiency is the result of a prolonged cycle of submittal and acceptance of the Lawrence Berkeley Laboratories (LBL) implementing procedures responding to the QARD. YMSCO Assistant Managers (AMs) prepared Participant Planning Sheets (PPSs) fully expecting LBL's implementing procedures and RTN Matrix to be accepted prior to PPS approval. It was further expected that until acceptance of their own RTN Matrix, LBL would continue working to the approved implementing procedures of USGS or LANL, as applicable, when the term "QARD Applies" was placed in the PPS Statement of Work. LBL had performed the same workscope in FY94 subcontracted through USGS and LANL. However, FY95 is the first year the PPS is assigned directly to LBL. The USGS or LANL approved implementing procedures are the only procedures available to LBL for performing the quality affecting workscope formerly assigned through USGS or LANL.

Remedial Actions:

1. YMSCO and YMQAD will execute a Letter of Clarification between DOE and LBL by 9/1/95 specifying which QA program (approved implementing documents) LBL must use until the LBL RTN Matrix is accepted, when performing each FY95 quality affecting workscope listed in the "Extent of Deficiency" section below. The documentation must serve as a clarification of the statement "QA Applies" in the PPSs and apply retroactively to cover the period beginning at PPS issuance.
2. LBL will identify to YMSCO by 9/1/95 the QA Program (USGS or LANL implementing procedures) used to perform quality affecting work that resulted in deliverables submitted between 10/1/94 and the acceptance date of LBL's RTN Matrix. YMSCO will regard the deliverables as conforming to QA requirements if the implementing procedures controlling the work are those specified in #1 above.

The LBL "QA Yes" PPSs are identified below in the "Extent of Deficiency" section. Remedial Action #1 above will clarify the QA requirements sufficiently for continuation of FY95 activities by LBL. Revising the listed PPSs would serve no purpose, as they are now being reprocessed for FY96 in accordance with YAP-2.6Q, with workscopes formerly assigned to LBL being directed to the M&O.

7/27/95 AMSI:RFB-4072

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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

Extent of Deficiency

The following "QA Yes" PPSs were issued to LBL without clearly specifying a QA program or the implementing procedures to be used:

- | | |
|---------------|--|
| 1.2.3.3.1.2.8 | Fluid Flow in UZ Fractured Rock |
| 1.2.3.3.1.2.9 | Site UZ Modeling and Synthesis |
| 1.2.3.3.1.3.3 | UZ Hydro. System Synthesis and Modeling |
| 1.2.3.4.1.5.2 | Demo of Applicability of Laboratory Data |
| 1.2.3.11.2 | Surface-Based Geophysical Testing |
| 1.2.5.3.5 | Technical Database Input |

This deficiency does not affect any other Participant, as all others are on the Qualified Suppliers List and have achieved acceptance of their RTN Matrix.

Action to Preclude Recurrence

1. YMQAD will by 8/1/95 accept the LBL RTN Matrix of QARD implementing procedures.
2. YMSCO will revise YAP-2.6Q by 9/30/95 to:
 - a. Check that when quality affecting work is in the PPS, the preparer has entered "The following quality affecting work shall be accomplished in accordance with approved implementing procedures identified on the current OCRWM-accepted RTN Matrix" at the beginning of the Statement of Work field.
 - b. Check that the preparer has clearly identified any non-quality affecting deliverables in the Deliverables field in accordance with YAP-30.17 when the Statement of Work indicates quality affecting activities.

VERIFICATION OF CAR YM-95-048

Remedial Action

Clarification letter for QA Program Controls Spence to Bodvarsson August 18, 1995.

Lawrence Berkeley letter identifying QA Program used to perform deliverables submitted between 10/1/94 and acceptance of LBL's RTN Matrix approval. Bodvarsson to Susan Jones August 30, 1995.

Action to preclude Recurrence

YMQAD acceptance of LBL's RTN Matrix ref. letter YMQAD:CEH-4027 7/21/95

Revision to YAP-2.6Q ICN #1 9/29/95

JD 10/4/95