



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

APR 09 1996

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 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

EVALUATION OF RESPONSE TO DEFICIENCY REPORT (DR) YMQAD-96-D042
 RESULTING FROM U.S. DEPARTMENT OF ENERGY HEADQUARTERS QUALITY
 ASSURANCE DIVISION'S AUDIT HQ-ARC-96-01 (SCPB: N/A)

The Yucca Mountain Quality Assurance Division staff has evaluated the response to DR YMQAD-96-D042. The response has been determined to be satisfactory. Verification of completion of the corrective action 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 James T. Schmit at 794-7709.

Robert B. Constable

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-1516

Enclosure:
 DR YMQAD-96-D042

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

- cc w/o encl:
- W. L. Belke, NRC, Las Vegas, NV
 - D. G. Sult, YMQAD/QATSS, Las Vegas, NV
 - J. T. Schmit, YMQAD/QATSS, Las Vegas, NV

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8 Performance Report
 Deficiency Report
NO. YMOAD-96-D042
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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 *J. T. Schmit* Date 02/16/96
9 QA Review: QAR J. T. Schmit *J. T. Schmit* Date 02/16/96

10 Response Due Date: *20 WORKING DAYS FROM ISSUANCE*
3-19-96
11 QA Assurance Approval: *[Signature]* Date *2-26-96*
QAR (PRI/AOCAM (DR))

12 Remedial Actions:
SEE PR/DR CONTINUATION P. 4 OF

13 Remedial Action Response By: *A.M. SEGREST* Date *3-26-96*
14 Remedial Action Due Date: *6-3-96*
MAY 3, 1996 Date *3-26-96*

15 Remedial Action Response Acceptance: QAR *J. T. Schmit* Date *4/3/96*
16 PR Verification/Closure: QAR *N/A* Date

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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.

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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:

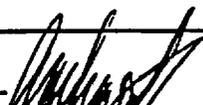
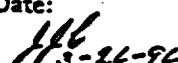
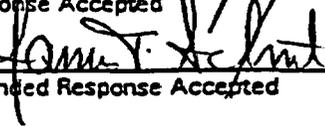
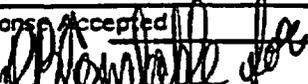
SEE PR/DR CONTINUATION PAGE 5 OF

19 Root Cause Determination:

SEE PR/DR CONTINUATION PAGE 5 OF

20 Action to Preclude Recurrence:

SEE PR/DR CONTINUATION PAGE 5 OF

21 Response by: <i>AM. SERPENT</i>  Date <u>3-26-96</u>	22 Corrective Action Completion Due Date: APR 3, 1996 <u>6-3-96</u>  <u>3-26-96</u>
23 Response Accepted QAR <i>J. T. DeLunt</i>  Date <u>4/3/96</u>	24 Response Accepted AOQAM  Date <u>4-8-96</u>
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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Response BLOCK 12 REMEDIAL ACTIONS:

1. (From Recommended Actions Block 17)

"Submit all past due records to the RPC in accordance with QAP-17-1, Rev. 4."

The examples listed in the DR have been submitted to the RPC or DRC as follows:

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.

The RPC signed receiving the transmittal for the above document on 2/16/96. #MOY-960125-03

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.

The RPC received the transmittal for the above documents on 2/15/96. #MOY-960125-02

3. Engineering Change Request No. E96-0035, E96-0037, and E96-0038 were completed 12/21/95 and submitted to the RPC 2/6/96.

The RPC had received the above transmittal before the compliance audit.

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.

The RPC had received the above transmittal during the compliance audit.

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.

The RPC has received a segmented package (ref:RPC-960311-01) for the TDPP.

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.

The above document was submitted to the area 25 DRC on 2/14/96. This document is being compiled in a segmented package.

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.

The above documents were submitted to the records segmented package before the audit.

2. (From Recommended Actions Block 17)

"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."

The subject section of the PAR was rejected because of the reason cited above. The Procedure, QAP-17-1, is currently being revised to produce Revision 5. The procedure revision is substantially along and is currently ready for another review/concurrence cycle. ATTACHMENT I is a Lotus Notes from the author on the how the wording in this section is intended to read. The closure for this item will be the completed procedure.

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Response BLOCK 18 INVESTIGATIVE ACTIONS

The investigative action will be conducted primarily by the Office of Product Integrity (OPI) group supported by various M&O operations groups. The focus of the Investigative Action is to determine the extent of a condition identified by Deficiency Report YMQAD-96-D042 regarding records submittal within a 20 day period after completion. The investigative action will be performed to determine the extent and impact of the condition and the results of the determination. The results will establish if a root cause determination and corrective action to preclude recurrence are required, or provide justification for no further actions.

The investigative action will look at a sample (initially approximately 10 %, the sample will be expanded if required) of various Quality Affecting products that were produced by the M&O within the time frame of August 21, 1996 until February 16, 1996. The sample products and/or records packages identified will be identified.

Response BLOCK 19 ROOT CAUSE DETERMINATION

The Root cause is expected to be a conclusion of the Investigative Actions described in Block 18.

Response BLOCK20 ACTION TO PRECLUDE RECURRENCE

The Action to Preclude Recurrence is expected to be developed during the Investigative Actions. The Investigative Actions will determine the severity and the extent of the problem. Once this is known the the Action to Preclude Recurrence will follow.

h:\data\afs\dr042b.afs

ATTACHMENT I

A1 OF A 1

To: Mary Woods
cc:
From: Margie Shepherd
Date: 03/26/96 03:24:44 PM EST
Subject: DR-042

This is the current wording in Draft B of QAP-17-1, Rev. 5. The wording, of course, can change (for the better), but I intend to keep the intent!!!

5.5.6 SUBMITTING RECORDS PACKAGES TO A RECORDS CENTER

The Record Source shall:

- A. complete a Transmittal/Receipt Acknowledgment, labeling a privileged records package as such in accordance with A-SRP-0032, and forward it with the records package to a Records Center; and**
- B. submit the original or a legible copy of the records package to a Records Center no later than:**
 - 1. 20 working days after completion (e.g., final approval signature) of the last record generated by the subject activity of the records package (not including the Records Package Table of Contents); or**
 - 2. for a personnel qualification and training records package, 20 working days after termination of employment with the M&O; or**
 - 3. for a procurement records package, in accordance with applicable procurement procedures.**