



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

**MAY 21 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 AMENDED RESPONSE TO DEFICIENCY REPORT (DR)  
YMQAD-96-D037 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE  
DIVISION'S (YMQAD) SURVEILLANCE YMP-SR-94-035 OF THE CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT AND OPERATING  
CONTRACTOR (CRWMS M&O) (SCPB: N/A)

The YMQAD staff has evaluated the amended response to  
DR YMQAD-96-D037. The amended response has been determined to  
be satisfactory. Please note, though, that we would like to be  
kept apprised by Lotus Notes of the status of the CRWMS M&O  
Management Plan for Unreported TFM Data.

Verification of completion of the corrective action will be  
performed after the CRWMS M&O Management Plan for Unreported TFM  
Data has been issued.

If you have any questions, please contact either Robert B. Constable  
at 794-5580 or Patout H. Cotter at 794-1332.

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-1773

Enclosure:  
DR YMQAD-96-D037

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  
Records Processing Center

cc w/o encl:

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

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**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document:  
YAP-2.8Q, Rev. 0

2 Related Report No.  
YMP-SR-94-035, YM-94-033, Rev. 1

3 Responsible Organization:  
CRWMS M&O

4 Discussed With:  
R. Dresel, O. J. Gilstrap

5 Requirement/Measurement Criteria:

This DR is issued to supersede CAR YM-94-033, Rev. 1, in order to implement the revised OCRWM Corrective Action Program.

YAP-2.8Q, Tracers, Fluids and Materials Data Reporting and Management requires that data from TFM reports of actual TFM use/removal, including accidental spills/releases be inputted into the TFM database.

6 Description of Condition:

It was found during the YMQAD implementation review that responsibilities were not well defined and understood by the implementing organizations and that TFM data reports are not being transmitted to the TFM Database Administrator from the responsible affected organizations so that they could be inputted to the TFM database.

7 Initiator

P. H. Cotter

*P.H. Cotter*

Date 2/7/96

9 QA Review

QAR P. H. Cotter

*P.H. Cotter*

Date 2/7/96

10 Response Due Date

N/A

11 QA Issuance Approval

QAR (PR)/AOQAM (DR)

*[Signature]*

Date 2-11-96

12 Remedial Actions:

See response to CAR YM-94-033, Rev. 1

13 Remedial Action Response By:

N/A

Date

14 Remedial Action Due Date

Date 1/2/96

15 Remedial Action Response Acceptance

QAR N/A

Date

16 PR Verification/Closure

QAR N/A

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**17 Recommended Actions:**

The M&O Construction and Operations Organization should coordinate the efforts of the AOs to initiate reporting of use of TFMs in accordance with YAP-2.8Q.

**18 Investigative Actions:**

See response to CAR YM-94-033, Rev. 1

**19 Root Cause Determination:**

N/A

**20 Action to Preclude Recurrence:**

N/A

**21 Response by:**

N/A Date

**22 Corrective Action Completion Due Date:**

January 2, 1996

**23 Response Accepted**

QAR N/A Date

**24 Response Accepted**

AOQAM N/A Date

**25 Amended Response Accepted**

QAR *[Signature]* Date 5/13/96

**26 Amended Response Accepted**

AOQAM *[Signature]* Date 5/17/96

**27 Corrective Actions Verified**

QAR Date

**28 Closure Approved by:**

AOQAM Date

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Introduction

This is an amended response to Deficiency Report (DR) YMQAD-96-D037. This amended response establishes our action plan for resolving the YAP-2.8Q implementation problems as documented in Surveillance Report 96-NSS-25.

The original response to this DR (submitted in response to CAR YM-94-033/Rev. 1) was submitted on October 31, 1995. The corrective actions from that response, and the status of each, are discussed below.

- **A revision to YAP-2.8Q to more specifically discuss responsibilities under that procedure:** Revision 01 of YAP-2.8Q was issued on January 5, 1996, and included a definition of Responsible Planning Organizations (RPOs), responsible for requesting use of TFMs, and Responsible Reporting Organizations (RROs), responsible for reporting actual use or removal of TFMs.
- **Formal classroom training on the revised YAP-2.8Q:** Subsequent to the revision of YAP-2.8Q, classroom training was performed on January 8, January 18, and February 7, 1996, involving representatives from each RPO and RRO.
- **Submission of outstanding TFM reports to the TFM Database Administrator (DBA):** Based on the surveillance results (96-NSS-25), it was determined that this amended response was necessary. The report found examples of TFM data that were not reported within the time allowed per YAP-2.8Q. These outstanding TFM data were in addition to the TFM data submitted per the original response to CAR YM-94-033/Rev 1.
- **A QA surveillance of compliance to YAP-2.8Q:** An M&O QA surveillance was completed by November 7, 1995 and surveillance report 96-NSS-03 was issued to fulfill this commitment.

As a result of subsequent followup surveillance, (96-NSS-25), additional investigation has been performed, and additional corrective actions are proposed in this amended response.

Investigation

The latest revision to YAP-2.8Q (Rev. 1) requires RROs to transmit reports of actual TFM use/removal to the Determination of Importance (DI) Manager. Under this latest revision, the DI Department is responsible for reviewing the TFM reports for consistent terminology use,

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approving the reports, and forwarding the reports to the TFM Database Administrator (DBA) for entry into the database, and the Records Processing Center (RPC). (Note: in YAP-2.8Q/Rev. 0, reports were made directly to the TFM DBA and RPC.)

The DI Manager is presently receiving (in accordance with YAP-2.8Q Rev. 1) TFM reports from the following RROs, as indicated in Table 1: the Constructor (Kiewit/PB), the Drilling Management Organization (DMO), the Surface Based Testing Coordination Office (SBTCO), and the ESF Test Coordination Office (ESFTCO). The other RROs (Construction & Field Ops/Surface Based Testing Facility Operations [C&FO/SBTFO] and Environmental Sciences) are aware of their reporting requirements. C&FO/SBTFO have indicated that they have not used or removed TFMs that would be considered reportable, and as a result have no outstanding or in-process TFM reports. Environmental Sciences have indicated that reportable TFM data are being recorded and will be reported to the DI Manager within the time required in YAP-2.8Q, also as indicated in Table 1.

As indicated in Table 1, each of the RROs is currently complying with YAP-2.8Q/Rev. 1. The pending data (i.e., reports in progress) from Environmental Sciences are to be submitted to the DI Manager in accordance with the periodic reporting requirements of YAP-2.8Q/Rev. 1.

The DI Manager has begun reviewing and submitting actual TFM reports to the TFM DBA.

In addition, each of the RROs is in the process of investigating the status of backlog unreported data (generally, data that were not sent to the TFM DBA in accordance with YAP-2.8Q/Rev. 0). The DI Manager is developing a plan (see Remedial Actions) for completing the RRO's determination of the extent of this unreported backlog TFM data, along with a schedule for submitting these data for entry in to the TFM database.

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Remedial Actions

The following remedial actions will allow this DR to be closed.

By May 17, 1996, the M&O Assistant General Manager (Dale Foust) will issue a Management Plan to all M&O/Nevada Operations Managers, reinforcing the responsibilities of RPOs and RROs under YAP-2.8Q. The Management Plan will describe the implementation of YAP-2.8Q for the backlog TFM data with the following details:

1. a summary of the history and results of this DR, identification of the current RPOs and RROs, and a statement reinforcing their responsibilities under YAP-2.8Q;
2. direction to the RROs to identify, compile, and submit unreported backlog TFM data to the DI Manager per YAP 2.8Q, including:
  - a. a date for each RRO to evaluate the extent of his organization's backlog TFM data (see note 1 below);
  - b. a date for each RRO to compile the backlog data and submit it to the DI Manager;
3. direction to the DI Manager for completing reports of backlog TFM data in accordance with YAP-2.8Q, including a date for the DI Manager to review the submittals and forward them to the TFM DBA and RPC.
4. Concurrence from each of the RRO managers, DI Manager, and the M&O Nevada Site QA Manager

Note 1: the documentation of extent and schedule for completing the reporting of backlog data will include the completion of in-process records currently being compiled as indicated in Table 1 of this DR response.

Prepared by: Thomas C. New Date: 4-26-96

Approved by: [Signature] Date: 4-26-96

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**Table 1: Current TFM Reporting Status (by Responsible Reporting Organization [RRO])**

RRO	Person Contacted	TFM Status
C&FO/ Constructor	David Wayman (secondary contact)	1. Transmittal under YAP-2.8Q/Rev 0 to TFM DBA complete per Note 1 2. Transmittal under YAP-2.8Q/Rev 1 to DI Mgr taking place per Note 2
C&FO/ Drilling Mgmt	Eddie Wright (primary)	1. Transmittal under YAP-2.8Q/Rev 0 to TFM DBA pending 2. Transmittal under YAP-2.8Q/Rev 1 to DI Mgr from 1/5/96 to 4/5/96 pending 3. Transmittal under YAP-2.8Q/Rev 1 to DI Mgr from 4/8/96 to present per Note 3
C&FO/SBTFO	Rufus Taylor (secondary)	1. Transmittal under YAP-2.8Q/Rev 0 to TFM DBA under investigation 2. No reportable TFMs generated since effective date of YAP-2.8Q/Rev 1 per Note 4
SBTCO	Ron Smith (primary)	1. Transmittal under YAP-2.8Q/Rev 0 to TFM DBA in progress per Note 5 2. Transmittal under YAP-2.8Q/Rev 1 to DI Mgr for G-2 pump test and C-Hole testing activities complete per Note 6
ESFTCO	Alan Mitchell (secondary)	1. All TFM usage except tracer gas reported to date per Note 7 2. Tracer gas submittal under investigation
Environmental Sciences	Kevin Blomquist (secondary)	1. Transmittal under YAP-2.8Q/Rev 0 to TFM DBA pending/under investigation 2. Topsoil Storage Area TFM use in progress, scheduled for reporting in accordance with YAP-2.8Q/Rev 1, to DI Mgr

Note 1: Letter, Wightman to Sandifer, *Tracers, Fluids, And Materials (TFM) Reporting in Response to Deficiency Report (DR) YMQAD-96-D037*, 4/1/96

Note 2: Letter, Wightman to Hastings, *Actual Use of TFM; ESF North Ramp - JP 9416 (2/9/96)* and Letter, Wightman to Hastings, *Actual Use of TFM; Water Use for YMP Surface Activities (3/15/96)*

Note 3: Informal copies of reports since 3/22/96 transmitted to DI Manager, formal copies being prepared for transmittal; formal transmittal of week ending 4/12/96 as per Letter LV.DMO.EFW.4/96-170, Wright to Hastings, *DMO Weekly TFM Report (4/16/96)*

Note 4: IOC LV.SBTF.SCS.4/96-205, Smith to Hastings, *Usage of Tracers, Fluids, or Materials During the Period January 5, 1996 through April 15, 1996 (SCPb: NA)*, 4/16/96

Note 5: IOC LV.SPO.TBR.4/96-366, Reynolds to Bartley, *Identification of Potential Sources of Unreported Tracers, Fluids, and Materials (TFMs) in Surface-Based Testing Activities*, April 16, 1996.

Note 6: IOC LV.SPO.RES.4/96-365, *Transmittal of TFM Reports for G-2 and C-Hole Complex (4/16/96)*

Note 7: Report of minor use of silicone rubber compound reported under YAP-2.8Q/Rev. 1 (2/1/96) and Letter, Mitchell to Bartley, *Status of Reporting Information Regarding TFM for ESF Testing Activities (4/11/96)*