



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

MAY 28 1996

L. Dale Foust
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

ISSUANCE OF DEFICIENCY REPORT (DR) YMQAD-96-D062 ISSUED TO SUPERSEDE
PERFORMANCE REPORT (PR) YMQAD-96-P020 (SCPB: N/A)

Enclosed is DR YMQAD-96-D062 issued to supersede PR YMQAD-96-P020.
This upgrade is due to the resolution of the deficiencies identified
in PR YMQAD-96-P020 requiring investigative action. As a result of
this upgrade, PR YMQAD-96-P020 is now closed.

Please identify the corrective action to be taken and implemented to
correct the deficiency. A DR Continuation Page has been provided.
Send the original of your response to Deborah Sult, YMQAD/QATSS,
P.O. Box 98608, Mail Stop 455, Las Vegas, Nevada 89193-8608. Response
to the DR is due 20 working days after issuance. Any extension to the
due date must be requested in writing, with appropriate justification,
prior to the due date.

If you have any questions, please contact either Robert B. Constable
at 794-5580 or Mary G. McDaniel at 794-1468.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-1827

Enclosures:

1. DR YMQAD-96-D062
2. PR/DR Continuation Page

9606030112 960528
PDR WASTE
WM-11 PDR

NHO3 1/1
102
WM-11

L. Dale Foust

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cc w/encls:

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 encls:

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

030050

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bcc w/encls:

J. R. Compton, YMSCO, NV

R. L. Craun, YMSCO, NV

J. M. Replogle, YMSCO, NV

B. J. Verna, YMSCO, NV

ORIGINAL
THIS IS A RED STAMP

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

Performance Report
 Deficiency Report
NO. YMQAD-96-D062
PAGE 1 OF 3
QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Quality Assurance Requirements and Description (QARD), DOE/RW-0333P, Rev. 5		2 Related Report No. YM-ARC-96-03 YMQAD-96-P020	
3 Responsible Organization: Kiewit/Parsons Brinckerhoff (Kiewit/PB)		4 Discussed With: C. Rixford / J. Christensen	
5 Requirement/Measurement Criteria: QARD, Section 5.0, Paragraph 5.2.2, states in part: "Implementing documents shall include the following information as appropriate to the work to be performed: A. Responsibilities and organizational interfaces of the organizations affected by the document. B. A sequential description of the work to be performed including controls for altering the sequence of required inspections, tests, and other operations." QARD, Section 2.0, Paragraph 2.2.10, states in part: "Implementing documents and documents that specify technical or quality requirements shall be reviewed to the following requirements: A. Review criteria shall be established before performing the review. C. The review shall be performed by individuals other than the preparer." <p style="text-align: right;">(Continued on Page 3)</p>			
6 Description of Condition: NOTE: This DR is issued to supersede Performance Report YMQAD-96-P020 since resolution of the deficiency involves investigative actions. PR YMQAD-96-P020 issued 12/21/95 identified the following description of condition: Contrary to the above, MCP-2.0, Revision 13 does not: 1. Adequately define the responsibilities of the Construction Manager or Quality Control Manager and the sequential description of the work to be performed as it relates to the initiation and preparation of the Work Package. 2. Define the interface between MCP-2.0 and MCP-10.0 as it relates to the Work Package. MCP-10.0, Revision 9, Section 3.2.2, identifies how inspection hold and witness points are identified in the Work Package and Section 3.2.1 establishes requirements/guidance on Work Package content and review criteria. 3. Adequately define the process or address QARD, Section 2.0, Paragraph 2.2.10, requirements for the review, approval, and revision of the Work Process Description (WPD). <p style="text-align: right;">(Continued on Page 3)</p>			
7 Initiator Mary G. McDaniel <i>Mary G. McDaniel</i> Date <u>5/10/96</u>		9 QA Review QAR <i>Mary G. McDaniel</i> Date <u>5/10/96</u>	
10 Response Due Date: 20 Working Days From Issuance		11 QA Issuance Approval QAR (PR)/AOQAM (DR) <i>RC Spive</i> Date <u>5/24/96</u>	
12 Remedial Actions:			
13 Remedial Actions Response By: Date		14 Remedial Action Due Date Date	
15 Remedial Action Response Acceptance QAR Date		16 PR Verification /Closure QAR Date	

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DR NO. YMQAD-96-D062
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*YVBL
5/16/96*

DEFICIENCY REPORT

17 Recommended Actions:

Identify in Block 20, changes made to MCP-2.0 and MCP-10.0 per YMQAD-96-P020 to clarify the rôles of the Construction Manager and Quality Control Manager in the Work Package preparation process; changes made to MCP-2.0 to control the review and approval of WPDs, Travelers, and Supplemental Travelers and revisions thereto; and training completed for the revised procedures.
Identify in Block 18 Work Package reviews performed in accordance with the revised MCP-2.0 per YMQAD-96-P020 and the results of these reviews. Also, identify in Block 18 the action taken to address the generation of records by the WPD per YMQAD-96-P020.

(Continued on Page 3)

18 Investigative Actions:

19 Root Cause Determination:

20 Action to Preclude Recurrence:

21 Response By:

Date

22 Corrective Action Completion Due Date

23 Response Accepted

QAR

Date

24 Response Accepted

AOQAM

Date

25 Amended Response Accepted

QAR

Date

26 Amended Response Accepted

AOQAM

Date

27 Corrective Action Verified

QAR

Date

28 Closure Approved by:

AOQAM

Date

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

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PERFORMANCE/DEFICIENCY REPORT

Block 5, Requirement/Measurement Criteria, continued

E. The scope of the review shall consider all aspects of the document.

1. Each organization or technical discipline affected by the document shall review the document according to the established review criteria. Changes to the document..."

QARD, Section 17.0, Paragraph 17.2.2A, states: "Implementing documents shall:

1. Identify those documents that will become QA Records."

Block 6, Description of Condition, continued

4. Adequately define what is considered a revision to the Work Package as addressed by Section 3.2.4 and when Environmental Safety and Health, Construction, and Quality Control review is required. Revision to Travelers and WPDs are not being documented in accordance with 3.2.4.
5. The generation of records by the WPD is not addressed. WPD 2.20.3, Revision 4, "TBM Excavation-North Ramp," controls the generation of records that provide objective evidence for TCP-2.3.

Review of corrective actions associated with YMQAD-96-P020 identified the following conditions:

1. MCP-2.0, Revision 16, Section 3.2.4, states: "Review of revisions to Work Package(s), which may include revisions to the WPD, Traveler, or Supplemental Traveler, shall be conducted in accordance with Paragraph 3.2.1D....In the event a revision to one of these documents results in a scope change impacting the Work Package, the WPD, Traveler, or Supplemental Traveler, or applicable document shall be revised and processed in accordance with Paragraph 3.2.1D." Paragraph 3.2.1D does not exist.
2. WPD 2.23.7, Revision 0, effective date 3/18/96 reflects approval by the Construction Manager and review by the Quality Control Manager, on the WPD itself. MCP-2.0 does not address this review and approval process for the WPD and remedial actions accepted 1/31/96 for YMQAD-96-P020 indicate that WPDs will not be approved other than through the checklist and Master Approval Sheet.
3. WPD 2.23.7, Revision 0, Section 3.0, references Section C and Section D of the Work Package for applicable procedures and contract documents. Section C and D of the Work Package include lists of applicable procedures and contract documents, respectively. MCP-2.0 does not provide for the review of these listings if documents are added or deleted.

Block 17, Recommended Actions, continued

Modify MCP-2.0 to reflect the correct paragraph reference for review of revisions to WPDs, Travelers, and Supplemental Travelers and define the WPD review and approval process by the Quality Control Manager and Construction Manager, as reflected on the WPD.

Establish control for the review and approval of changes to the list of applicable procedures and contract documents identified in Section C and D of the Work Package.

**OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
DEFICIENCY DOCUMENT ENCODING**

1. Document No. Y1M1Q1A1D---916---D101612---
 Issuing Org. Code
 Fiscal Yr. (last 2 digits)
 Document Type
 Seq. Number
 Extension number (for multiple deficiencies)

Doc. Type Codes:

- | | |
|-------------------------------|--|
| C - Corrective Action Request | O - Other: NRC commitments, Vendor documents |
| D - Deficiency Report | A - Deficiency closed during audit |
| P - Performance Report | S - Deficiency closed during surveillance |
| N - Nonconformance Report | T - STIR |

2. Initiation Date 05---16---96 (MM/DD/YY)

3. Deficiency Code: 051*

Deficiency Code: 023*

Deficiency Code: *

4. Deficiency Cause Code: 011C*

Deficiency Cause Code: *

Deficiency Cause Code: *

5. Hardware Code: (if applicable)

6. Supplier: (if applicable)

7. Miscellaneous: (if applicable)

8. Data File Review:

Open deficiency found: No Yes - DD# _____

Three or more recurring deficiencies in the same organization noted in last 4 quarters No Yes

If Yes, STIR initiated? Yes - STIR No.

No - If No, provide justification:

Y1M1Q1A1D-96-P020 converted to Y1M1Q1A1D-96-0062

OAR *Mary M. Samuel*

Date 5/17/96

* See latest revision of Trending Codes List

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8 Performance Report
 Deficiency Report

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PR/DR CONTINUATION PAGE