



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

JUN 26 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

**EVALUATION OF RESPONSE TO DEFICIENCY REPORT (DR) YMQAD-96-D060
RESULTING FROM OFFICE OF QUALITY ASSURANCE SURVEILLANCE
YMP-SR-96-011 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT
SYSTEM MANAGEMENT AND OPERATING CONTRACTOR (SCPB: N/A)**

The Yucca Mountain Quality Assurance Division staff has evaluated the response to DR YMQAD-96-D060. 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 that date. Please send a copy of extension requests to Deborah G. Sult, YMQAD/QATSS, P.O. Box 98608, Mail Stop 455, Las Vegas, Nevada 89193-8608.

If you have any questions, please contact either Robert B. Constable at (702) 794-5580 or Patout H. Cotter at (702) 794-1332.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-2035

Enclosure:
DR YMQAD-96-D060

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. B. Justice, M&O, Las Vegas, NV
R. P. Ruth, M&O, Las Vegas, NV
Records Processing Center

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JUN 26 1996

L. Dale Foust

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

ORIGINAL
THIS IS A RED STAMP

☐ Performance Report
☒ Deficiency Report

NO. YM-QAD-96-D060

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PERFORMANCE/DEFICIENCY REPORT

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

2 Related Report No.
YM-SR-96-011

3 Responsible Organization:
CRWMS M&O Design

4 Discussed With:
O. J. Gilstrap / C. Garrett / A. Segrest / J. Naaf / J. Heaney /

5 Requirement/Measurement Criteria:

YAP-15.1Q, Paragraph 5.2, "Dispositioning NCRs." Paragraph 5.2.2, states:

The Dispositioner:

h) for Use-As-Is dispositions, verifies that affected drawings and specifications are annotated to reference Use-As-Is dispositioned NCR and completes appropriate portion of Block 7, "Completion of Disposition," of the NCR; NOTE: If the Use-As-Is disposition is a one time exception to the approved drawings and/or specifications and the approved drawings and/or specifications are not revised, indicate this as part of the technical justification.

6 Description of Condition:

Contrary to YAP-15.1Q requirements:

1. The following dispositions of NCRs do not indicate "Use-As-Is" as a one time exception to the approved drawings and/or specifications:

YMSCO-95-0052
YMSCO-95-122
YMSCO-95-0150

2. The following dispositions of NCRs do not identify the applicable change document (BCP or ECR):

YMSCO-95-0119
YMSCO-95-0137

7 Initiator

Patout H. Corter

Date 5/8/96

9 QA Review

QAR

Date 5/8/96

10 Response Due Date

20 Working Days From Issuance

11 QA Issuance Approval

QAR (PRI)/AOQAM (DRI)

Date 5/15/96

12 Remedial Actions:

Revise NCRs as necessary to comply with QAP requirements.

116
6-11-96

SEE EXPLANATION - BLOCK 18 INVESTIGATIVE
ACTIONS ON PAGE 4

13 Remedial Action Response By:

Date 6/14/96

14 Remedial Action Due Date

SEP. 30, 1996

Date

15 Remedial Action Response Acceptance

QAR

Date 6/21/96

16 PR Verification/Closure

QAR

N/A

Date

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17 Recommended Actions:

1. Determine the full extent of this condition, i.e., review all "use-as-is" and "repair" NCRs to identify like conditions.
2. Determine the root cause of deficient condition.
3. Determine and implement actions to preclude recurrence.

18 Investigative Actions:

SEE TEXT ON PR/DR CONTINUATION PAGE 4

19 Root Cause Determination:

NOT REQUIRED SEE TEXT BLOCK 18
INVESTIGATIVE ACTIONS FOR REASONING ON
PR/DR CONTINUATION PAGE 4

20 Action to Preclude Recurrence:

SEE TEXT ON PR/DR CONTINUATION PAGE 4

21 Response by:

Date

6/14/96

22 Corrective Action Completion Due Date:

SEP. 30, 1996

23 Response Accepted

QAR

Date

6/21/96

24 Response Accepted

AOQAM

Date

6-25-96

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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Block 5, Requirement/Measurement Criteria, continued

YAP-15.1Q, Paragraph 6.1, Paragraph 6.1.7, "Disposition Factor," states:

"For all dispositions - Documents or record changes required by disposition of the nonconformance shall be identified in the NCR, and when each document or record is changed, the justification for the change shall identify the NCR number. The NCR shall not be closed prior to changes to the affected documents being completed.

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BLOCK 12 REMEDIAL ACTION

REFERENCE: YAP-15.1Q CONTROL OF NONCONFORMANCES

Refer to BLOCK 18 Investigative Action and BLOCK 20 Action to Preclude Recurrence for reasoning regarding this BLOCK. A DAR has already been submitted to get the procedure changed as indicated. NCRs written during FY '95 and '96 will be reviewed to make sure that BLOCK 4 Justification?Comments indicates the disposition is a one time exception to drawings and specifications if "Use-as-Is" or "Repair" is indicated as a disposition. Revisions, if required will be processed according to section 5.4 of the procedure.

BLOCK 18 INVESTIGATIVE ACTIONS

See BLOCK 12 REMEDIAL ACTION above.

Response to Condition 1 of BLOCK 6

MGDS Development agrees that NCRs dispositioned "Use-as-Is" or "Repair", on a one time basis should be identified. A DAR has been generated and submitted requesting that the NCR form be modified to add a block to check off if a "Use-As-Is" or "Repair" disposition is a one time only basis. In addition the DAR requests that the note be deleted and made a mandatory requirement by checking the new block on the NCR form. A further Root Cause is not required.

Response to Condition 2 BLOCK 6

The NCR YMSCO-95-0119 disposition is reject/scrap, not "Use-As-Is". No Action is necessary.

NCR YMSCO-95-0137 states "The ESF Ground Support Design Analysis and Test, Inspection and Material Dedication Analysis: Shotcrete, Rockbolts and Accessories was revised along with Specification 02165 thereby changing para. 3.03.E.3 which removes the requirement for measuring the density of the grout mix.

Review of changes to Specification 02165 revision 5 (BCP nos. 02-95-050, 056, 066, 133, 170 and ECR nos. 95-074, 96-006, 014, 036, and 053) indicate that the changing of Specification 02165 para. 3.03.E.3 as required by disposition to NCR 95-0137 was not by ECR or BCP. The change was made during complete revision no. 6 of Specification 02165. The NCR referenced the specification revisions in the resolution. No action necessary. A further Root Cause is not required.

BLOCK 20 ACTION TO PRECLUDE RECURRENCE

A DAR has been generated and submitted requesting that the NCR form be modified to add a block to check off if a use-as-is or repair disposition is a one time only basis. In addition the DAR requests that the note be deleted and made a mandatory requirement by checking the new block on the NCR. The MGDS Development Manager will issue an IOC instruction memo to the design staff working on the disposition of NCRs regarding the one time exception to the drawings and specifications to make sure that the one time exception is included in BLOCK 4 Disposition Evaluation.