



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

JUL 25 1995

Wesley E. Barnes, PM, YMSCO, NV  
ATTN: James R. Compton, AMSL, YMSCO, NV

**EVALUATION OF RESPONSE TO DEFICIENCY REPORT (DR) YM-96-D-059  
RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION'S  
(YMQAD) REVIEW (SCPB: N/A)**

The YMQAD staff has evaluated the response to DR YM-96-D-059. 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.

If you have any questions, please contact either Robert B. Constable at (702) 794-5580 or Mary G. McDaniel at (702) 794-1468.

Richard E. Spence, Director  
Yucca Mountain Quality Assurance Division

YMQAD:RBC-2253

Enclosure:  
DR YM-96-D-059

cc w/encl:

J. G. Spraul, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
Patricia Pytel, M&O, Las Vegas, NV  
D. S. White, M&O, Las Vegas, NV  
E. R. Cooper, YMSCO, NV  
Records Processing Center

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV  
D. G. Horton, OQA, NV  
M. G. McDaniel, 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.**

**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document: QAP 5.1, Revision 7	2 Related Report No. N/A
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3 Responsible Organization: Yucca Mountain Site Characterization Office	4 Discussed With: J. Zimmerman
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5 Requirement/Measurement Criteria:  
 QAP 5.1, Section 5.6, required the preparer to:

"a) Perform the document interface review as follows:...

- 2) Complete Section 2 of the Document Development form, identifying any OCRWM controlled document reviewed to determine impact resulting from the procedure activity.
- 3) Initiate a DAR or other authorized change request against any affected OCRWM controlled document, and record the number of the request on the Document Development form.

b) If the procedure implements QARD requirements, prepare a requirements matrix, using the Requirements Matrix Input form, Attachment 8, for a new procedure, or for an existing procedure, using a report from the RTN with any changes identified..."

6 Description of Condition:  
 Contrary to the above, document interface reviews and Requirements Traceability Network (RTN) Matrix reviews/updates were not performed for the following procedures:

YAP-SIII.1Q, Revision 1  
 AP-17.1Q, Revision 0

7 Initiator Mary G. McDaniel <i>Mary G. McDaniel</i> Date 5/7/96	9 QA Review QAR <i>Mary G. McDaniel</i> Date 5/7/96
10 Response Due Date: 20 Working Days From Issuance	11 QA Issuance Approval QAR (PR)/AOQAM (DR) <i>RC Spivey</i> Date 5/15/96

12 Remedial Actions:  
 Based on the extent of condition identified in Block 18, TPM will direct procedure Preparers to conduct document interface reviews and prepare Requirements Matrix Input form or mark-up an RTN report as follows: For the three procedures for which "editorial" Intern Change Notices (ICN) were issued the Document Development Form (DDF) was completed and identified that no other documents were impacted by the changes. No RTN matrix will be prepared due to the scope of the editorial changes; the editorial changes did not renumber sections or attachments, or change the title or document number therefore the RTN matrix has not been affected. TPM will update the RTN matrix to reflect the current revision/ICN number.

-continued-

13 Remedial Actions Response By: <i>Jarri Adams</i> Date 7/17/96	14 Remedial Action Due Date <i>Jarri Adams</i> Date 9-6-96
15 Remedial Action Response Acceptance QAR <i>Mary G. McDaniel</i> Date 7/18/96	16 PR Verification/Closure QAR N/A Date

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**DEFICIENCY REPORT**

**17 Recommended Actions:**

Determine extent of condition identified in Block 6 for procedures and revisions developed since 3/1/96. Direct document interface reviews for those procedures/revisions identified and initiate Document Action Requests, procedure modifications, corrective actions, as appropriate. In addition, direct preparation of RTN Matrix updates, as appropriate, and submit for QA review in accordance with QAP 6.2. Update RTN as necessary.

**18 Investigative Actions:**

Technical Publications Management (TPM) has determined the extent of the condition identified in Block 6. The Document Action Request Tracking System (DART) was queried to determine which procedures and revisions had been entered into the formal QAP 6.2 review process after 03/01/96. A matrix is attached listing the affected documents. This deficiency occurred as a result of an error upon implementing QAP 5.1. TPM staff were working on the resolution of comments for YAP-5.1Q, Revision 3, which directs Affected Organizations to use the DAR and follow the process in QAP 5.1 for development, change, and review of procedures. Due to many conflicts during this resolution, the procedure was not effective concurrent with the QAP 5.1. It was effective 06/28/96. TPM misunderstood that it should direct Affected Organizations to work to QAP 5.1 after its implementation, but before YAP-5.1Q Revision 3 became effective. -continued-

**19 Root Cause Determination:**

N/A

**20 Action to Preclude Recurrence**

N/A

**21 Response By**

*Jeri Hedons*

Date *7/17/96*

**22 Corrective Action Completion Due Date**

*N/A*

**23 Response Accepted**

QAR *Miss McNeal*

Date *7/18/96*

**24 Response Accepted**

AOQAM *Blomquist* Date *7-23-96*

**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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12. Remedial Actions: -continued-

For the remaining procedures identified, the DDF and the RTN Matrix or marked-up RTN report will be prepared and processed as follows. 1) For in-process procedures the DDF and RTN Matrix will be included in the procedure comment resolution package and submitted for QA review as part of the comment resolution process. The RTN Matrix will be updated as part of the formal QAP 5.1 process. 2) For completed procedures the RTN Matrix will be submitted to QA for QAP 6.2 review and acceptance. The RTN Matrix will be updated after QA acceptance.

Upon completion of YMQAD reviews of the DDFs and RTN Matrix Input forms or the marked-up RTN reports, if applicable, these documents will be included in the Records Packages for each procedure, or if a Records Package has already been filed, a supplemental package will be submitted to include these documents.

TPM staff have been instructed in the proper use of both YAP-5.1Q and QAP 5.1 for completion of the DAR, DDF, and the RTN Matrix Input form, if applicable, for requesting a procedure activity for documents received in TPM after 05/07/96, the date YMQAD initiated the Performance/Deficiency Report. The Publication Coordination Supervisor is monitoring this effort to ensure no further deficiencies result. YAP-5.1Q became effective 06/28/96, and directs in Section 5.2, Request for Development or Change of an AP, that Requestors initiate an OCRWM DAR located in QAP 5.1 and follow the process steps in QAP 5.1 to complete development or change of an AP.

18. Investigative Actions: -continued-

On discussion with YMQAD, it was clarified that sufficient direction exists in YAP-5.1Q, Revision 2, to allow TPM to direct Affected Organizations to complete the DAR in QAP 5.1 and follow the process in QAP 5.1 for procedure development, change, review, and cancellation including completion of the Document Development Form. This misunderstanding is an isolated incident and therefore Root Cause Determination and Action to Preclude Recurrence is not required.

**DOCUMENTS IN PROCESS BEFORE 3/1 - IN REVIEW AFTER 3/1**

DOCUMENT #	REVISION/ICN #	PREPARER	CURRENT STATUS
AP-2.1Q	0/0	D. Hendrix	Comment Resolution
AP-2.2Q	0/0	D. Hendrix	Comment Resolution
YAP-5.7Q	0/0	A. Burningham	Effective 04/25/96
YAP-SIII.1Q	1/0	S. Bodnar	Comment Resolution
YAP-SIII.4Q (EDITORIAL ICN)	0/1	E. Cooper	Effective 06/18/96

**DOCUMENTS PUT INTO PROCESS AND SENT OUT FOR REVIEW AFTER 3/1**

DOCUMENT #	REVISION/ICN #	PREPARER	CURRENT STATUS
AP-17.1Q	0/0	L. Tate	Comment Resolution
YAP-2.11Q	0/0	T. Grant	To approval 06/17/96
YAP-3.5Q	3/0	S. Wright-Moncilovic	Comment Resolution

**DOCUMENTS PUT INTO PROCESS AND COMPLETED AFTER 3/1  
(EDITORIAL ICNs)**

DOCUMENT #	REVISION/ICN #	PREPARER	CURRENT STATUS
HLP-2.3Q	0/1	C. Weber	Effective 07/01/96
QAP 6.2	3/1	B. Tate	Effective 04/01/96