

memorandum

DATE: SEPTEMBER 19, 1996 QA:L

REPLY TO: RW-3

ATTN OF:

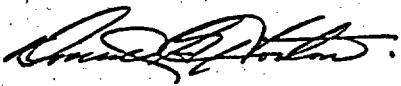
SUBJECT: Issuance of Deficiency Reports YM-96-D-095 through YM-96-D-100 and YM-96-D-102 resulting from Quality Assurance (QA) Audit HQ-ARC-96-003 of Yucca Mountain Site Characterization Office Activities.

TO: Wesley E. Barnes, Project Manager, Yucca Mountain Site Characterization Project Office (YMSCO)

Please find attached the six Deficiency Reports (DRS) issued as a result of audit HQ-ARC-96-003 conducted by the Office of Quality Assurance, Headquarters Quality Assurance Division (HQAD) of the Yucca Mountain Site Characterization Office QA Program and implementation in Las Vegas, Nevada, on August 5 through 9, 1996.

A response to the DRS is required by the date listed in Block 12 on the DR form. The response must be signed and should include concise corrective actions to be taken, the names of the responsible individuals, and the scheduled completion dates. Refer to AP 16.1Q, Attachments 9.3 and 9.5 for direction in developing your response. The response needs to address the required action on Blocks 10 and 14 through 17 on the DR form. Please submit your original response on PR/DR continuation sheets, a copy of which is also attached for your use.

If you have any questions, please contact Bob Clark at (202) 58601238 or James George at (202) 488-5429.


Donald G. Horton, Director
Office of Quality Assurance

Attachments

D. Dreyfus, RW-1
L. Barrett, RW-2
T. Johnson, RW-3.1
T. Wood, RW-14
J. Spraul, NRC, Washington, DC
C. Haughney, NRC, Washington, DC
R. Loux, NWPO, Carson City, NV
S. Zimmerman, NWPO, Carson City, NV
Jim Regan, Churchill County Commission, Fallon, NV
D. Bechtel, Clark County Comprehensive, Las Vegas, NV
Susan Dudley, Esmeralda County, Goldfield, NV
Sandy Green, Eureka County, Eureka, NV
Tammy Manzini, Lander County, Battle Mountain, NV
Jason Pitts, Lincoln County, Pioche, NV
V. Poc, Mineral County, Hawthorne, NV
P. Niedzielski-Eichner, Nye County, Chantilly, VA

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PDR WASTE
WM-11 PDR

102.7

NH 33
WM-11

Recap: NMSS/HLUR

L. Bradshaw, Nye County, Tonopah, NV
William Offutt, Nye County, Tonopah, NV
Wayne Cameron, White Pine County, Ely, NV
B. Mettam, County of Inyo, Independence, CA
Mifflin and Associates, Las Vegas, NV
R. Ruth, M&O/Duke, Las Vegas, NV
R. Morgan, M&O/Duke, Vienna, VA
J. Clark, M&O, Vienna, VA
C. Henkel, NEI, Washington, DC
R. Spence, YMQAD, Las Vegas
W. Dixon, Assistant Manager for Environmental, Safety and Health, Las Vegas
J. Adams, Assistant Manager for Administration
R. Craun, Assistant Manager for Engineering and Field Operations
S. Jones, Assistant Manager for Scientific Programs
S. Brocoum, Assistant Manager for Suitability and Licensing

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

8 Performance Report
 Deficiency Report
 NO. YM-96-D-095
 PAGE 1 OF
 QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: YMSCO Procedure YLP-2.1Q, Rev. 1, ICN 2 & QARD, Rev. 5
 2 Related Report No. HQ-ARC-96-003

3 Responsible Organization: YUCCA Mountain Site Characterization Office (YMSCO) - AMA
 4 Discussed With: Dick Spence/Sandra L. Rouse

5 Requirement/Measurement Criteria:
 QARD Section 2.2.12B, D and F
 "...Establish description for those positions that include work subject to the QARD."
 "...Establish minimum education and experience requirements for each position."
 "...Ensure minimum education and experience are verified or, when minimum education and experience cannot be specifically verified, provide a statement of justification for the personnel assignment."
 (CONTINUED ON PAGE 3)

6 Description of Condition:
 Contrary to the requirements in block 5 above:
 1) Personnel Qualification Records Packages of those Federal Employees referenced on Attachment 1 do not contain one or more of the following:
 a. Position Qualification Statement (PQS)
 b. Definition of Education Requirements
 c. Definition of Experience Requirements
 d. Adequate documentation of verification of education and experience*
 e. Justification Statement for Education or Experience which could not be verified (as applicable).
 *Note: Letters documenting that verification had been performed reference DOE Order 3731.1, which does not describe a process of verification of education and experience.
 2) YLP-2.1Q does not describe (or refer to) a process for verification of minimum education and experience.

7 Initiator: Charles E. Betts Date 09/11/96
 9 Is condition an isolated occurrence?
 Yes No Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)
 1) Ensure that each open Personnel Qualifications Records Package for Federal OCRWM YMSCO Personnel contain the following information:
 a. Position Qualification Statement (PQS)
 b. Definition of Education Requirements
 c. Definition of Experience Requirements
 d. Adequate documentation of verification of education and experience.
 e. Justification Statement for Education or Experience which could not be verified (as applicable) (CONTINUED ON PAGE 3)

11 QA Review: QAR Date 9/18/96
 12 Response Due Date: 10/31/96

13 Affected Organization QA Manager Issuance Approval: (QAR for PR)
 Printed Name: Donald G. Horton Signature: R.W. Celf Date: 9/18/96

22 Corrective Actions Verified: QAR Date
 23 Closure Approved by: (N/A for PR) AOQAM Date

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WASHINGTON, D.C.

PR/DR NO. YM-96-D-095
PAGE 2 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required Yes No

17 Action to Preclude Recurrence: (Not required for PR)

Required Yes No

18 Corrective Action Completion Due Date:

19 Response by:

Initial

Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

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8 Performance Report
 Deficiency Report

NO. YM-96-D-095

PAGE 3 OF

QA: L

PR/DR CONTINUATION PAGE

5 REQUIREMENT (CON'T)

QARD Section 17.2.1.A.7

"Documents that meet the following requirements shall be classified as lifetime QA records...Personnel training and qualification documents for individuals executing QA program requirements."

QARD Section 5.2 and 5.2.2.C

"Work shall be performed in accordance with controlled implementing documents...implementing documents shall include...a sequential description of the work to be performed..."

YLP-2.1Q Section 7.1

"Each of the following shall be designated as a lifetime QA record.

- a) Position Description
- b) Position Qualification Statement....
- d) Documentation Attesting to Completion of Verification"

10 RECOMMENDED ACTIONS (CON'T)

- 2) To clearly document the Verification of Education and Experience Requirements the preferred and/or alternate methods for Verification of Education and Experience as delineated in the QARD Lessons Learned/Program Clarification NO. 93-001 (See Attachment 2) should be adhered to.
- 3) Review Position Qualification Statement to determine if information is relevant to latest position held and that evidence of verification was performed. Letter of Justification as minimum will be required for all position changes.
- 4) Ensure that YLP-2.1Q-YMSCO is revised to provide clear and concise direction for conducting Personnel Qualification including all those activities which have been detailed in recommendations (1) through (3) above. Any differences in processing Federal vs. Contractor Personnel Qualification activities should be clearly delineated.
- 5) Ensure that all supervisory personnel receive training to YLP-2.1Q-YMSCO, "YUCCA MOUNTAIN SITE CHARACTERIZATION OFFICE QUALIFICATION AND TRAINING".
- 6) Ensure those individuals responsible for the implementation and conduct of Personnel Qualifications have been properly trained to YLP-2.1Q-YMSCO.
- 7) Ensure adequate objective evidence of the aforementioned requirements are included in the YMSCO Records System.

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WASHINGTON, D.C.

8 Performance Report
 Deficiency Report

NO. YM-96-D-095

PAGE 4 OF

QA: L

PR/DR CONTINUATION PAGE

ATTACHMENT 1

EMPLOYEE	PQS IN PLACE	EDUCATION REQUIREMENTS DEFINED	EXPERIENCE REQUIREMENTS DEFINED	EDUCATION VERIFIED	EXPERIENCE VERIFIED	JUSTIFICATION FOR EDUCATION	JUSTIFICATION FOR EXPERIENCE
MARK C. TYNAN	YES	NO NOTE 1	NO NOTE 1	SEE NOTE 2	SEE NOTE 2	N/A	N/A
RICHARD CRAUN	NO	NO	NO	SEE NOTE 2	SEE NOTE 2	N/A	N/A
JOHN G. GANDI	YES	NO NOTE 1	NO NOTE 1	SEE NOTE 2	SEE NOTE 2	N/A	N/A
MICHAEL VALENTINE	YES	NO	NO	YES	YES	N/A	N/A

NOTE 1: Memo in personnel file that states, "DOE Education and Employment Records Verification of Education and Employment have been completed for the DOE Employee. These verifications have been completed in accordance with DOE Order 3731.1, Suitability, Position Sensitivity and Related Personnel Matters."

NOTE 2: Memo in personnel file that states, "Position descriptions for federal employees are written and processed in accordance with procedures established by the OPM. Minimum education and experience requirements are documented in the OPM Handbook X-118, Qualification Standards for Position Under the General Schedule."

N/A: Not Applicable

**CIVILIAN RADIOACTIVE WASTE MANAGEMENT (CRWM) PROGRAM
OFFICE OF QUALITY ASSURANCE (OQA)
LESSONS LEARNED/PROGRAM CLARIFICATION NO. 93-001**

SUBJECT

QA Program Element 2.0, Quality Assurance Program, specifically: Verification of Minimum Education and Experience.

CONDITION SUMMARY

Some CRWM affected organizations are unaware of the different methodologies of satisfying the requirement for Verification of Minimum Education and Experience.

RESOLUTION

Education Verification

Preferred Method: On company letterhead, request written verification of the highest level of education the employee (or potential employee) had earned from the school Office of the Registrar. Request verification of degree(s) awarded, (or transcript) education major, and dates attended.

Alternate Method: Telephone the school's Office of the Registrar, identify your company and yourself, and request verification of the highest level of education the employee (or potential employee) had earned. Record the following information:

- Date and time
- Telephone number
- Registrar staff member's name providing information
- Degree(s) awarded
- Education major
- Dates attended
- (units toward degree, if a degree was not awarded)
- The signature and date of the requestor

Note: An employee furnished copy of a diploma or transcript is not satisfactory for use as objective evidence in education verification.

Experience Verification

Preferred Method: On company letterhead, request written verification of work experience from the employee's previous employer(s) for the dates and position descriptions cited on the employee's resume.

**CIVILIAN RADIOACTIVE WASTE MANAGEMENT (CRWM) PROGRAM OFFICE OF
QUALITY ASSURANCE (OQA)**

LESSONS LEARNED/PROGRAM CLARIFICATION NO. 93-001

(continued)

Alternate Method: Telephone the employee's previous company personnel department or previous department manager. Identify your company and yourself and request verification of the employee's work experience. Record the following information:

- Date and time
- Company name, address and telephone number, personnel staff member name or previous department staff member providing the information.
- Dates employed
- Position description
- The signature and date of the requestor.

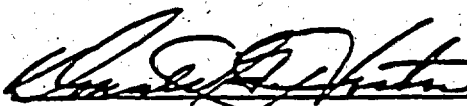
In the event that the employee's previous company is out of business or personnel records are no longer available, due to time duration since being employed by the company, it is permissible to contact person(s) that have personal knowledge of the employee's work history for a specified time frame. Record the following information:

- Date and time
- Persons name, address and telephone number providing the information
- Confirmation of the dates provided on employee's resume. Record actual time frame being evaluated
- Position description title, or job title
- The signature and date of the requestor.

Note: Objective evidence accumulated or generated for the purpose of education and experience verification is subject to surveillance and audit.

BASIS FOR RESOLUTION

DOE/RW/0333P, Rev.#0 QARD, QA Element 2.0, Quality Assurance Program. Paragraph 2.2.11 Personnel Selection, Indoctrination, Training and Qualification. Item F. states "Ensure minimum education and experience are verified or, when minimum education and experience cannot be specifically verified, provide a statement and justification for the personnel assignment."

 5/11/93
Date

Donald G. Horton
Director
Office of Quality Assurance

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

8 Performance Report
 Deficiency Report
 NO. YM-96-D-096
 PAGE 1 OF
 QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Quality Assurance Requirements and Description (QARD), Revision 5	2 Related Report No. HQ-ARC-96-003
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3 Responsible Organization: Yucca Mountain Site Characterization Office (YMSCO) <i>- Duty Project Manager</i>	4 Discussed With: Richard Spence
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5 Requirement/Measurement Criteria:

QARD (DOE/RW-0333P), Section 2.0, Quality Assurance Program, Paragraph 2.2.1 B. 4., states that each Affected Organization shall review revisions to the QARD and incorporate changes into their implementing documents, as appropriate.

6 Description of Condition:

Contrary to the requirement, no objective evidence could be produced to show that YMSCO had completed the required reviews of Revision 5 of the QARD to determine and incorporate required changes into implementing documents since Revision 5 became effective in October of 1995.

7 Initiator <i>[Signature]</i> James George Date 09/11/96	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Actions: (Not required for PR)
 Complete the effort to incorporate changes to implementing documents as a result of the Revision 5 changes to the QARD.
 Provide a schedule for completion of required implementing document revisions.
 Perform an analysis to determine the impact of not having completed procedure revisions, as required.

11 QA Review QAR <i>[Signature]</i> Date 9/18/96	12 Response Due Date 10/31/96
---	----------------------------------

13 Affected Organization QA Manager Issuance Approval: (QAR for PR)	
Printed Name Donald G. Horton	Signature <i>[Signature]</i> Date 9/18/96

22 Corrective Actions Verified QAR Date	23 Closure Approved by: (N/A for PR) AOQAM Date
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U.S. DEPARTMENT OF ENERGY
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PR/DR NO. YM-96-D-096
PAGE 2 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required Yes No

17 Action to Preclude Recurrence: (Not required for PR)

Required Yes No

18 Corrective Action Completion Due Date:

19 Response by:

Initial

Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

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8 Performance Report
 Deficiency Report

NO. YM-96-D-096

PAGE 3 OF

QA: L

PR/DR CONTINUATION PAGE

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

8 Performance Report
 Deficiency Report
 NO. YM-96-D-097
 PAGE 1 OF
 QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:
YMSCO Procedure YAP-2.1Q, Rev. 1, ICN 2

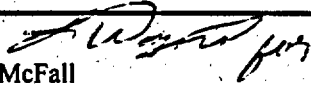
2 Related Report No.
HQ-ARC-96-003

3 Responsible Organization:
YUCCA Mountain Site Characterization Office (YMSCO)
-AMA

4 Discussed With:
Sandra L. Rouse


- 5 Requirement/Measurement Criteria:
- 1) Paragraph 5.4.1.c requires the supervisor (for job change qualification and training) to initiate a training assignment.
 - 2) Paragraph 5.4.2 requires the supervisor to verify, to the extent possible, that the employee meets the minimum education and experience required for the position if the new position description requires additional education or experience.
 - 3) Paragraph 5.4.5 requires that the employee completes training on documents that govern quality affecting activities prior to performing those activities and verifies this on the training assignment
 - 4) Paragraph 5.1.1.a and b require the supervisor to develop or obtain a Position Description (PD) and complete Part 1, except for Item 1 of the Position Qualification Statement (PQS).

- 6 Description of Condition:
- 1) Contrary to the above requirement, R. Schreiner's PD (dated 02/02/96) says that he is to participate in technical and management reviews of participant produced technical documents in support of Assistant Manager for Engineering and Field Operations under the Quality Assurance Requirements and Description. Training records indicate that he is not required, nor has he completed training to Yucca Mountain Site Characterization Project Administrative Procedure YAP-6.2Q (Document Review).
 - 2) Contrary to the above requirement, there is no evidence indicating this was done for J. Savino when transferring to the Project Management Organization (PMO).
 - 3) Contrary to the above requirement, there is no evidence that J. Savino has completed any training since transferring to the PMO.
 - 4) Contrary to the above requirements, R. Schreiner and J. Frank have no PQS in their training files and J. Savino has not had a new PD or PQS updated since 1991.

7 Initiator 
Kenneth T. McFall Date 09/11/96

9 Is condition an isolated occurrence?
 Yes No Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)

11 QA Review 
QAR Date 9/18/96

12 Response Due Date
10/31/96

13 Affected Organization QA Manager Issuance Approval: (QAR for PR)

Printed Name Donald G. Horton Signature  Date 9/18/96

22 Corrective Actions Verified
QAR Date

23 Closure Approved by: (N/A for PR)
AOQAM Date

OFFICE OF CIVILIAN
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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

PR/DR NO. YM-96-D-097
PAGE 2 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required Yes No

17 Action to Preclude Recurrence: (Not required for PR)

Required Yes No

18 Corrective Action Completion Due Date:

19 Response by:

Initial

Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

8 Performance Report
 Deficiency Report

NO. YM-96-D-097

PAGE 3 OF

QA: L

PR/DR CONTINUATION PAGE

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

8 Performance Report
 Deficiency Report
NO. YM-96-D-098
PAGE 1 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Quality Assurance Requirements and Description (QARD), Rev. 5	2 Related Report No. HQ-ARC-96-003
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3 Responsible Organization: Yucca Mountain Site Characterization Office (YMSCO) - AMEFO	4 Discussed With: Bernard J. Verna
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5 Requirement/Measurement Criteria:
QARD Section 7.0, Paragraph 7.2.1, states, in part, "Procurements shall be planned and documented to ensure a systematic approach to the procurement process. Procurement planning shall:

D. Provide for the integration of the following activities:

8. Acceptance of items and service."

QARD 2.0, Paragraph 2.2.1B., states in part, "Affected organizations shall establish implementing documents applicable to their scope of work that translate QARD requirements into work processes.

6 Description of Condition:

Contrary to the above requirements YMSCO-Assistant Manager for Engineering and Field Operations has not established implementing documents for the acceptance of items and services (Specifications and Drawings) when those items and services are not identified as deliverables in accordance with Yucca Mountain Site Characterization project Administrative Procedure YAP-5.1Q, Revision 3, "Submittal of Documents for Development, Change, Review, and Deliverable Acceptance.

Examples of this deficiency include the design for the South Portal and South Portal Access Road.

7 Initiator John S. Martin Date 09/11/96	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Actions: (Not required for PR)

- Investigate the process to determine how those services will be accepted and review and/or develop procedures as necessary.
- Perform those actions necessary to accept those services noted in Block 6.

11 QA Review QAR [Signature] Date 9/18/96	12 Response Due Date 10/31/96
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13 Affected Organization QA Manager Issuance Approval: (QAR for PR)	
Printed Name Donald G. Horton	Signature R.W. Clef for Date 9/18/96

22 Corrective Actions Verified QAR Date	23 Closure Approved by: (N/A for PR) AOQAM Date
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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

PR/DR NO. YM-96-D-098
PAGE 2 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required Yes No

17 Action to Preclude Recurrence: (Not required for PR)

Required Yes No

18 Corrective Action Completion Due Date:

19 Response by:

Initial

Amended

Date

Phone

20 Response Accepted

21 Response Accepted (N/A for PR):

QAR

Date

AOQAM

Date

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

8 Performance Report
 Deficiency Report

NO. YM-96-D-098

PAGE 3 OF

QA: L

PR/DR CONTINUATION PAGE

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

8 Performance Report
 Deficiency Report
NO. YM-96-D-099
PAGE 1 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Quality Assurance Requirements and Description (QARD), Rev. 5	2 Related Report No. HQ-ARC-96-003
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3 Responsible Organization: Yucca Mountain Site Characterization Office (YMSCO) -AMA	4 Discussed With: Judith E. Zimmermian/Sandra L. Moore
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5 Requirement/Measurement Criteria:
QARD, Section 5.0, Paragraph 5.2, states "Work shall be performed in accordance with controlled implementing documents."

QARD Section 6.0, Paragraph 6.2.5, states in part: "The distribution and use of documents, including changes and editorial corrections to documents shall include the following:

- A. Documents, either in hard copy or electronic media, used to perform work shall be distributed to, or made available to, and used at, the work location.
- B. Effective dates shall be established for approved implementing documents.
- C. The disposition of obsolete or superseded documents shall be controlled to ensure that they are not used to perform work."

6 Description of Condition:
Contrary to the above requirements, the control of forms is such that a current revision of a form may not be available in the forms system for use.
Discussion:
Procedure Yucca Mountain Site Characterization Project Administrative Procedure YAP-5.20 Q, Revision 1, "Forms Administration," allowed the Technical Publications Management (TPM) organization the latitude to input into the electronically controlled forms system a new or revised form 20 working days after the effective date of the form. In discussions with the TPM it was ascertained that YAP-5.20Q was scheduled for deletion and was during the course of the audit. It was stated that Quality Assurance Procedure QAP 5.1 would be utilized to ensure that the forms system is updated. However, in review of QAP 5.1, it was found that no positive controls exist or are described as to how this is to be accomplished.

(Continued on Page 3)

7 Initiator <i>J. S. Martin</i> John S. Martin Date 09/11/96	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Actions: (Not required for PR)
1) Investigate the process to determine how only correct and current forms will be posted within the electronic database on the effective date.
2) It is recommended that a procedure similar to Yucca Mountain Site Characterization Project Line Procedure, YLP-5.2Q, Assistant Manager for Administration, "Maintenance of the OCRWM Program Procedures Database," be developed to ensure that only current forms are available for use.

11 QA Review QAR <i>J. W. [Signature]</i> Date 9/15/96	12 Response Due Date 10/31/96
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13 Affected Organization QA Manager Issuance Approval: (QAR for PR) Printed Name Donald G. Horton Signature <i>R. W. [Signature]</i> Date 9/18/96
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22 Corrective Actions Verified QAR Date	23 Closure Approved by: (N/A for PR) AOQAM Date
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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

PR/DR NO. YM-96-D-099
PAGE 2 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required Yes No

17 Action to Preclude Recurrence: (Not required for PR)

Required Yes No

18 Corrective Action Completion Due Date:

19 Response by:

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20 Response Accepted

21 Response Accepted (N/A for PR):

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

8 Performance Report
 Deficiency Report

NO. YM-96-D-099

PAGE 3 OF

QA: L

PR/DR CONTINUATION PAGE

Description of Condition (continued from page 1).

In addition, in review of the Forms Control System, a note appears which indicates the user is responsible for ensuring that they are using the latest form. The electronic media Forms Control System provides controlled forms for use and was developed to provide access by project users. The current revision of forms should be available for use, as it is for procedures in the Program Procedures Database. It should not be left up to the user to ensure he has the latest form. It is the responsibility of the organization controlling input of the form into the system.

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

8 Performance Report
 Deficiency Report

NO. YM-96-D-099

PAGE 4 OF

QA: L

PR/DR CONTINUATION PAGE

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

8 Performance Report
 Deficiency Report

NO. YM-96-D-100

PAGE 1 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Quality Assurance Requirements Document (QARD), Rev. 5, Section 17.0	2 Related Report No: Audit HQ-ARC-96-003
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3 Responsible Organization: Yucca Mountain Site Characterization Office (YMSCO) - AMSP	4 Discussed With: Diane McAlister
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5 Requirement/Measurement Criteria:
QARD Section 17.2.2 B. states that individuals creating QA records shall ensure that the QA records are legible, accurate, complete, appropriate to the work accomplished, and identifiable to the item(s) or activity(s) to which they apply.

6 Description of Condition:
Contrary to the requirement, in attempting to follow-up on the status and condition of records generated in relation to the implementation of procedure YAP-SIII.3Q, Processing of Technical Data on the Yucca Mountain Site Characterization Project, the following problems were identified with the sampled packages as identified by their respective Data Tracking Numbers (DTN):

A. DTN MO07QED000003.001 identified on the Technical Data Information Form (TDIF) that the identification of the acquired data was from a gyroscopic directional survey for borehole UE-25-WT11. However, the Technical Data Submittal indicated that the directional survey was conducted at a different location, i.e. USW-WT-11.

B. DTN GS940508312231.006 records package table of contents identifies the borehole as USW UZ-16, while the TDIF identifies it as borehole UE-25 UZ#16. Also, in the comments section of the TDIF there is an indication that the TDIF was revised on 7/11/96, while the final "checked" date appears to be 7/7/96. Also, there appears to be no link between the sample ID numbers and the data attached to the TDIF or it is missing.
(See continuation).

7 Initiator Richard Peck <i>[Signature]</i> Date 09/11/96	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Actions: (Not required for PR)

- Investigate population for other records problems.
- Determine significance of these deficiencies and the potential impact on the use of the data.

11 QA Review QAR <i>[Signature]</i> Date 9/18/96	12 Response Due Date 10/31/96
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13 Affected Organization QA Manager Issuance Approval: (QAR for PR) Printed Name Donald G. Horton Signature <i>[Signature]</i> Date 9/18/96

22 Corrective Actions Verified QAR _____ Date _____	23 Closure Approved by: (N/A for PR) AQQAM _____ Date _____
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PR/DR NO. YM-96-D-100
PAGE 2 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required Yes No

17 Action to Preclude Recurrence: (Not required for PR)

Required Yes No

18 Corrective Action Completion Due Date:

19 Response by:

Initial

Amended

Date

Phone

20 Response Accepted

21 Response Accepted (N/A for PR):

QAR

Date

AQAM

Date

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WASHINGTON, D.C.

8 Performance Report
 Deficiency Report

NO. YM-96-D-100

PAGE 3 OF

QA: L

PR/DR CONTINUATION PAGE

6. Description of Condition (Continued):

C. DTN GS940508312231.007 indicates on the TDIF that the borehole numbers are USW UZ-N11, USW UZ-N15, USW UZ-N16, etc. The relative humidity oven calculation sheets attached to the TDIF show the numbering with a character moved (e.g., UZN-11, UZN-15, UZN-16, etc.). Also the TDIF package indicates that it is composed of three (3) pages, while the package is actually composed of twenty-five (25) pages. The attached data sheets are not paginated, therefore making it difficult to determine if all data is actually contained relevant to that particular TDIF.

D. Relevant to the pagination issue mentioned above, it appears that most of the Data Sheets attached to the sampled TDIF packages were not numbered as pages of the respective package. This makes accountability difficult and raises the question as to whether or not all data has been properly recorded and documented as a record..

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8 Performance Report
 Deficiency Report

NO. YM-96-D-100

PAGE 4 OF

QA: L

PR/DR CONTINUATION PAGE

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U.S. DEPARTMENT OF ENERGY
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8 Performance Report
 Deficiency Report
 NO. YM-96-D-102
 PAGE 1 OF
 QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Quality Assurance Requirements and Description (QARD), Rev. 5
 2 Related Report No. HQ-ARC-96-003

3 Responsible Organization: Yucca Mountain Site Characterization Office (YMSCO) - AMA
 4 Discussed With: Judith E. Zimmerman/Sandra L. Moore

5 Requirement/Measurement Criteria:
 QARD, Section 5.0, Paragraph 5.2.4 Compliance with Implementing Documents states in part: "Individuals shall comply with implementing documents..."

6 Description of Condition:
 Individuals cannot comply with Yucca Mountain Site Characterization Project Line Procedure (YLP) -4.1Q-YMSCO, "Procurement Actions." YLP-4.1Q-YMSCO stipulates the utilization of Administrative Procedure (AP) -6.17Q. AP-6.17Q was superseded by YAP-2.7Q, "Item Classification and Maintenance of the Q-List" on 3/1/95.
 Discussion:
 On March 1, 1996, Quality Assurance Procedure (QAP) 5.1, Revision 7, was issued addressing the requirement for impact review of documents that may be affected by a change to or cancellation of a procedure. Prior to this time no requirement existed for impact analysis.

7 Initiator: John S. Martin Date 09/17/96
 9 Is condition an isolated occurrence?
 Yes No Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)
 1) Revise YLP-4.1Q to delete reference to the cancelled procedure and to add reference the correct one, as appropriate.
 2) Investigate to determine extent of the condition and the impact of referencing a cancelled procedure, included should be an analysis as to whether or not the appropriate procedure was utilized during the time-frame.

11 QA Review: QAR [Signature] Date 9/18/96
 12 Response Due Date: 10/31/96

13 Affected Organization QA Manager Issuance Approval: (QAR for PR)
 Printed Name: Donald G. Horton Signature: [Signature] Date: 9/18/96

22 Corrective Actions Verified: QAR Date
 23 Closure Approved by: (N/A for PR) AQQAM Date

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PR/DR NO. YM-96-D-102
PAGE 2 OF
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required Yes No

17 Action to Preclude Recurrence: (Not required for PR)

Required Yes No

18 Corrective Action Completion Due Date:

19 Response by:

Initial

Amended

Date

Phone

20 Response Accepted

21 Response Accepted (N/A for PR):

QAR

Date

AOQAM

Date

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8 Performance Report
 Deficiency Report

NO. YM-96-D-102

PAGE 3 OF

QA: L

PR/DR CONTINUATION PAGE