



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

JUL 31 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

**VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT
 (DR) YM-96-D-041 RESULTING FROM U.S. DEPARTMENT OF ENERGY
 HEADQUARTERS QUALITY ASSURANCE DIVISION'S AUDIT HQ-ARC-96-01
 (SCPB: N/A)**

The Yucca Mountain Quality Assurance Division staff has verified the corrective action to DR YM-96-D-041 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either Robert B. Constable at (702) 794-5580 or John S. Martin at (702) 794-5591.

Robert B. Constable

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-2293

Enclosure:
 DR YM-96-D-041

cc w/encl:
 T. A. Wood, DOE/HQ (RW-14) FORS
 J. G. Spraul, NRC, Washington, DC
 S. W. Zimmerman, NWPO, Carson City, NV
 R. L. Strickler, M&O, Vienna, VA
 B. R. Justice, M&O, Las Vegas, NV
 R. P. Ruth, M&O, Las Vegas, NV
 Records Processing Center

cc w/o encl:
 W. L. Belke, NRC, Las Vegas, NV
 D. G. Sult, YMQAD/QATSS, Las Vegas, NV
 D. G. Horton, OQA, NV
 James Blaylock, YMQAD, NV

*NH03/1
 102.7
 WM-11*

9608060321 960731
 PDR WASTE PDR
 WM-11

Recip: J. Spraul

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

8 Performance Report
 Deficiency Report
YM-96-D-041
NO. MQAD-96-0041
PAGE 1 OF 7 3/24/96
QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:
DOE/RW-0333P QARD

2 Related Report No.
HQ-ARC-96-01

3 Responsible Organization:
M&O

4 Discussed With:
Wes Pugmire (M&O QA), Larry Croft, Dave Van Bibber (EFPD)

5 Requirement/Measurement Criteria:
Appendix C.2.3 states "nonconforming products resulting from activities specified in work controlling documents (such as job packages or work requests) shall be documented, evaluated, identified, segregated, and dispositioned in accordance with Section 15.0, Nonconformances, of this QARD."

6 Description of Condition:
The M&O has issued procedures which do not require nonconforming products to be processed in accordance with Section 15.0 of the QARD (e.g. in accordance with YAP15.1Q). Procedures QAP 12-1, Rev 2 and NLP-III-4 direct one to AP 16.1Q (and/or AP16.2Q) for nonconforming products rather than YAP15.1Q. Additionally, the M&O has processed changes to NWIs (subtier implementation procedures) to delete references to YAP 15.1 Q and instead reference the Section 16 procedures in violation of QA program requirements.

7 Initiator
K.O. Gilkerson
K.O. Gilkerson Date 02/16/96

9 QA Review
J.S. Martin
J.S. Martin
QAR *J.T. Schmitt* 2-11-96 Date

10 Response Due Date
20 working days from issuance

11 QA Issuance Approval
[Signature]
QAR (PRI/AOQAM (DR)) Date 2-26-96

12 Remedial Actions:
See PR/DR Continuation Page 3 of 4, Block 12, Remedial Action.

13 Remedial Action Response By:
Dennis Sorensen
Dennis Sorensen Date 3/26/96

14 Remedial Action Due Date
Date 6/28/96

15 Remedial Action Response Acceptance
QAR *[Signature]* Date 4/10/96

16 PR Verification/Closure
QAR N/A Date

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

DR NO. *YM-46-D-047*
PAGE 2 OF 4
QA: L

DEFICIENCY REPORT

17 Recommended Actions:

Revise M&O procedures as necessary to comply with QARD.

18 Investigative Actions:

See PR/DR Continuation Page 3 of 4, Block 18, Investigation Activities.

19 Root Cause Determination:

See PR/DR Continuation Page 4 of 4, Block 19, Root Cause Determination.

20 Action to Preclude Recurrence:

As this issue was a matter of requirements interpretation and a "one-time" condition associated with documentation of "out of tolerance" of M&TE, corrective action to preclude recurrence is not applicable.

21 Response by: Dennis Sorensen <i>[Signature]</i> Date 3/26/96	22 Corrective Action Completion Due Date: 6/28/96
23 Response Accepted QAR <i>[Signature]</i> Date 4/10/96	24 Response Accepted AOQAM <i>[Signature]</i> Date 4-17-96
25 Amended Response Accepted QAR <i>[Signature]</i> N/A Date	26 Amended Response Accepted AOQAM N/A Date
27 Corrective Action Verified QAR <i>[Signature]</i> Date 7/24/96	28 Closure Approved by: AOQAM <i>[Signature]</i> for Date 7-29-96

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

8 Performance Report
 Deficiency Report

NO. YMQAD-96-D041
PAGE 3 OF 4

QA: L

PR/DR CONTINUATION PAGE

Block 12, Remedial Action:

1. QAP-12-1, Revision 2, will be revised to reflect that "out of tolerance conditions" for M&TE will be documented and processed in accordance with YAP-15.1Q. This revision is scheduled for completion by June 1, 1996, by Dennis Sorensen.

4 4-10-96

2. NLP-SIII-2 (as this procedure mainly addresses scientific data) was revised to require that when a "deficiency causes an item or physical sample to be nonconforming, or if the deficiency causes designed constructed or partially constructed systems, structures, or components to be nonconforming, initiate a Nonconformance Report in accordance with YAP-15.1Q, Control of Nonconformances." This revision was completed and effective on March 8, 1996, by Dennis Sorensen.

3. NWI-RED-006Q and NWI-SMF-005Q will be reviewed and revised, as necessary, for consistency with documentation and processing requirements M&TE "out of tolerance conditions" as specified with higher tier procedures. This revision is scheduled for completion by June 28, 1996, by respective Responsible Managers.

Block 18, Investigation Activities:

A review was conducted to evaluate QA Program requirements to identify and confirm violation of QARD requirements, as indicated in this DR, Block 6. In addition, interviews were conducted with M&O personnel to include George Donaldson, Dennis Sorensen, Mike Harris, Doug Franks, Robert Justice, Dan Tunney, Ron Berlien, and Joe Willis. Several meetings were also conducted to discuss this issue.

This issue was also presented to Mr. Dick Spence (DOE Director, Yucca Mountain QA Division) and John Marin (QATSS). Mr. Spence directed that the M&O was to document and process "out of tolerance" M&TE in accordance with YAP-15.1Q.

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

8 Performance Report
 Deficiency Report

NO. YMQAD-96-D041

PAGE 4 OF 4

QA: L

PR/DR CONTINUATION PAGE

Block 19, Root Cause Determination:

OCRWM Quality Assurance requirements and associated procedures did not require, or provide for, implementation of QARD, Section 15; QARD, Appendix C; or YAP-15.1Q, for control of M&TE found to be "out of tolerance." Root cause identified and determined to be associated with the following conditions:

1. Block 6 (which indicated a violation of QARD requirements), of this Deficiency Report, referred to QARD, C.2.3, which discusses documenting, evaluating, identifying, segregating, and dispositioning of "nonconforming products." There were no relationships identified or found to associate "M&TE" with "nonconforming products." Therefore, reference to YAP-15.1Q was not included or related to M&TE in the preparation of M&O procedures for control of M&TE found to be "out of tolerance."
2. QARD, Section 12, was reviewed and found not to reference QARD Section 15, for control of M&TE found to be "out of tolerance." Therefore, reference to YAP-15.1Q was not included or related to M&TE in the preparation of M&O procedures for control of M&TE found to be "out of tolerance."
3. QARD, Section 15, was reviewed and was found not to reference QARD Section 12, for control of M&TE found to be "out of tolerance." This Section was found only to include "items and samples." The definition for "item" found in the QARD Glossary does not include M&TE. Therefore, reference to YAP-15.1Q was not included or related to M&TE in the preparation of M&O procedures for control of M&TE found to be "out of tolerance."
4. YAP-15.1Q, Revision 2, dated 7/3/95, did not include M&TE found to be "out of tolerance," but was specific to "items and samples." Therefore, reference to YAP-15.1Q was not included or related to M&TE in the preparation of M&O procedures for control of M&TE found to be "out of tolerance."

VERIFICATION OF CORRECTIVE ACTION
FOR DEFICIENCY REPORT (DR) YMQAD-96-D041

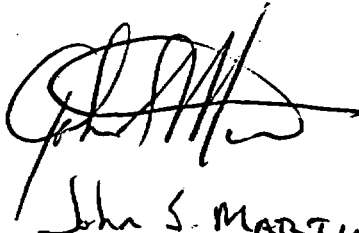
The corrective actions for subject DR were verified on 7/19/96 and 7/23/96. All actions committed to within the accepted response were found to be completed and acceptable. The following are the procedures verified as being revised:

- QAP-12-1, Revision 3, paragraph 5.7, revised to delineate that M&TE found to be out of calibration would be evaluated in accordance with YAP-15.1Q.
- NLP-SIII-4, Revision 2, paragraph 5.5, was revised to reference YAP-15.1Q.
- NWI-RED-006Q, Revision 1/ICN 1, paragraphs 3.5 and 3.7 were revised to reference YAP-15.1Q.
- NWI-SMF-005Q, Revision 1/ICN 1, paragraph 3.5 was revised to reference QAP-12-1.

In addition to the above committed corrective actions, two other procedures were revised to reference QAP-12-1. These procedures are:

- NWI-MET-001Q, Revision 1, references QAP-12-1.
- NWI-MET-009Q, Revision 1, references QAP-12-1.

Based on the accepted response, completion of committed corrective actions no further actions are deemed necessary at this time. This DR is considered closed.

QAR  7/24/96
John S. MARTIN