



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

SEP 19 1996

L. D. 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) YM-96-D-089
 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION'S
 (YMQAD) AUDIT YM-ARC-96-18 OF SANDIA NATIONAL LABORATORIES**

The YMQAD staff has evaluated the response to DR YM-96-D-089. The response has been determined to be unsatisfactory because of the following reasons:

Parts of Block 14 - Remedial Action, need to be rewritten: (1) Sentence one states, "there is no value to correct the Document Review and Comment forms. . . ." This implies there may be no reason to have complete forms. This would not be appropriate. This sentence needs to be deleted from the response. (2) Sentence three reads, "There does not appear to be sufficient impact to quality. . . ." The word "appear" suggests an uncertain position. If there are problems with the 120 active work agreements, there is ample concern that the 275 inactive, closed work agreements have the same problems. (3) A check needs to be performed of these work agreements and documented to show the extent of the problem. Any problems found need to be resolved.

Block 15 - Extent of Condition, needs to be rewritten. Due to the uncertainty mentioned above, this section needs to be written to commit to the needed check of records.

Blocks 16 and 17 - Root Cause Determination and Action to Preclude Recurrence, respectively, need to be written to explain what will be done. The level of uncertainty of this DR requires a Root Cause Determination and an Action to Preclude Recurrence to be performed.

An amended response is required to be submitted to this office within ten working days of the date of this letter. Send the original of your response to Deborah Sult, YMQAD/QATSS, P.O. Box 98608, Mail Stop 455, Las Vegas, Nevada 89193-8608. If an extension to the due date is necessary, it must be requested in writing, with appropriate justification, prior to that date.

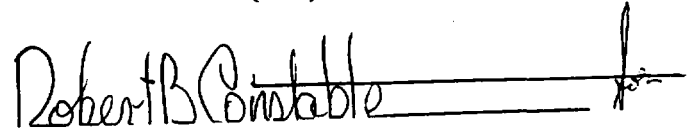
9609240285 960919
 PDR WASTE PDR
 WM-11

102.7

NH33
 WM-11

Recip: NMSS/HLUR

If you have any questions, please contact either Robert B. Constable at (702) 794-5580 or Stephen D. Harris at (702) 794-5522.



YMQAD:RBC-2663

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

Enclosure:
DR YM-96-D-089

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. R. Richards, M&O/SNL, Albuquerque, NM, M/S 1333
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
S. D. Harris, YMQAD/QATSS, Las Vegas, NV
D. G. Sult, YMQAD/QATSS, Las Vegas, NV
D. G. Horton, DOE/OQA, Las Vegas, NV

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

ORIGINAL
THIS IS A RED STAMP
 Performance Report
 Deficiency Report
NO. YM-96-D089
PAGE 1 OF 2
QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: QAIP 6-3, Revision 03	2 Related Report No. YM-ARC-96-18
3 Responsible Organization: SNL	4 Discussed With: Joe Schelling

5 Requirement/Measurement Criteria:

Section 5.1, Step 3, Note 2: states, "The review requester shall specify the criteria to be used to perform the review and shall assure that each reviewer is provided with those criteria (e.g., procedure checklists or review guidelines.) Example criteria are printed on the back side of the DRC form."

6 Description of Condition:

Contrary to the above requirement review criteria were not specified on DRC forms on 3 of 4 review packages audited:

 WA-182, Revision 01
 WA-205, Revision 02
 QAIP 1-2, Revision 10 (Corrections made during audit)

Other blanks on the DRC forms were also not completed (e.g., Revision # of the document in review.)

7 Initiator <i>Richard L. Weeks for</i> Stephen D. Harris Date 8/1/96	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown; Must be Yes if PR
--	---

10 Recommended Action: (Not required for PR)

All DRC forms need to be evaluated and corrected as necessary to indicate review criteria and document revision, as a minimum.

11 QA Review: <i>Richard L. Weeks for</i> QAR Stephen D. Harris for Date 8/1/96	12 Response Due Date 20 working days from issuance
13 Affected Organization QA manager Issuance Approval: (QAR for PR) Printed Name R.E. SPENCE Signature <i>Robert B. Buntable</i> Date 8.7.96	
22 Corrective Action Verified QAR Date	23 Closure Approved by: (N/A for PR) AOQAM Date

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

PR/DR NO. YM-96-D089
PAGE 2 OF 3
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

See Continuation Page.

15 Extent of Condition: (Not required for PR)

See Continuation Page.

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:

October 30, 1996

19 Response by: *PR*
R RICHARDS *OS F Ell*

Initial

Amended

Date *9/7/96*

Phone *805-898-0611*

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

9/5/96. Brad & Susan

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

8 Performance Report
 Deficiency Report

NO. YM-96-D089
PAGE 3 OF 3
QA: L

PR/DR CONTINUATION PAGE

BLOCK 14 - REMEDIAL ACTIONS:

For the QAIPs, there is no value to correct the Document Review and Comment forms as they are non-processed records and will never be submitted to the Project Records system. For the Work Agreements: The SNL QA Staff will inspect the approximately 120 active work agreement records packages and ensure that the criteria to be used for the review are specified or specify the default criteria on the reverse of the DRC form and ensure that the Work Agreement Revision number is on the DRC form or enter it. There does not appear to be sufficient impact to quality to submit revised records to the Records Processing Center in Las Vegas for the approximately 275 inactive, closed work agreement records packages.

Further, the DRC form will be modified with the next revision to QAIP 6-3 to state that, unless specified otherwise, the reviewer is to use the default criteria on the reverse of the form for the particular type of review (technical, management, or QA) being conducted.

Also, a QA Advisory will be issued to reinforce the concept that all blank spaces on a form must be accounted for.

BLOCK 15 - EXTENT OF CONDITION:

Because there are review criteria on the reverse of the DRC form and because the procedures requiring reviews all mention the criteria on the reverse, there are quite a few DRC forms without review criteria specified. And, since the Work Agreement is normally attached to the DRC form, there are quite a few with the revision number missing. However, since the number of DRC forms processed as QA records is finite and bounded and we are able to correct those records, there is no need to accomplish a root cause determination. Actions taken during the remedial action phase of the DR correction (modifying the form and issuing a QA advisory) should prevent recurrence of this deficiency so there is no need to specify additional actions to preclude recurrence.