



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

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 for Yucca Mountain
 Site Characterization Project
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 Las Vegas, NV 89109

**EVALUATION OF RESPONSE TO DEFICIENCY REPORT (DR) YM-96-D-086
 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-086. The response has been determined to be partially unsatisfactory: Block 14, explaining the initial remedial actions appears to be acceptable, however, Blocks, 15, 16 and 17 are not, because of the following reasons:

Block 15 - Extent of Condition, mentions that Quality Assurance Implementing Procedure 17-3, Revision 2, Appendix A, has conflicts with other referenced procedures for the generation of records. It also mentions that the deficiency appears to be confined to that Appendix. The term "appears" is not measurable. This response is not satisfactory. An evaluation needs to be performed and documented showing whether or not other conflicts exist and what needs to be done to resolve the conflict. If other resolution needs to be done, this action must be performed. These actions must then be verified by the Office of Quality Assurance.

Block 16 says no Root Cause Determination needs to be performed and Block 17, no Action to Preclude Recurrence is needed. This is unsatisfactory. Administrative Procedure 16.1Q, Revision 1, Section 5.3e) Note: gives direction for both Root Cause and Action to Preclude Recurrence. Since the cause of this DR is unclear and extent is unknown, a Root Cause Determination and an Action to Preclude Recurrence are necessary to satisfactorily complete actions to permit closure. In addition, the date for completion may need to be revised.

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.

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Recap: NMSS/HLUR

SEP 19 1996

L. D. Foust

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

Robert B Constable _____

YMQAD:RBC-2665

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

Enclosure:
DR YM-96-D-086

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

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

ORIGINAL
TUE 08 Performance Report
 Deficiency Report
NO. YM-96-D086
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: QARD, Revision 4	2 Related Report No. YM-ARC-96-18
3 Responsible Organization: SNL	4 Discussed With: C. Jaramillo

5 Requirement/Measurement Criteria:

QARD 17.2.2, D. states in part, "Records shall be considered QA records when stamped, initialed, or signed and dated as complete...."

QAIP 17-3, Revision 02, Appendix A, Page 10 & 11 identifies DRCs and mark-up procedures as QA records.

QAIP 6-3, Revision 03, Section 5.3 Step 6 - states (author/request), "Shall submit DRC form(s) and any markups to the local records center in accordance with Procedure 17-1."

(See individual document procedure to determine if the DRC is maintained as a QA record.)

6 Description of Condition:

DRC forms for review of QAIP 5-1, Revision 05 and QAIP 1-2, Revision 10 and mark-up procedures have not been submitted to the LRC.

Also, it appears the requirements of QAIP 17-3, Revision 02 and QAIP 6-3, Revision 03 are in conflict with one other. Specifically, Section 6.0, bullet, states, "See individual document procedure to determine if the DRC is maintained as a QA record," however, QAIP 17-3, Revision 02, Appendix A (see QAIP 6-3) lists DRC and other documents such as marked-up procedures as lifetime records.

*R.L.W.
8/6/96*

7 Initiator <i>Richard L. White</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
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10 Recommended Action: (Not required for PR)

Obtain and submit missing records to the LRC.

Evaluate the issue described in the second paragraph of Block 6 above, and revise procedures as appropriate.

11 QA Review: <i>Richard L. White</i> QAR Stephen D. Harris 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. Constable</i> Date 8.7.96	
22 Corrective Action 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.

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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 1, 1996

19 Response by:

FOR R. RICHMONS

OS F Ell

Initial

Amended

Date 9/4/96

Phone 818-0611

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

9/5/96 *Bridget Spence*

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

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PR/DR CONTINUATION PAGE

BLOCK 14 - REMEDIAL ACTIONS:

The records have actually been processed correctly based upon the statement in QAIP 6-3, "See individual document procedures to determine if the DRC is maintained as a QA record." and the statement from QAIP 5-1 that states, "Non-processed records generated by this procedure may be retained by the Quality Assurance Department in a separate record package. The record package includes procedure review comment and resolution documentation including DRC forms." The Quality Assurance Department is maintaining the DRC forms and markup copies of QAIP 5-1, Revision 05 and QAIP 1-2, Revision 10 as non-processed records. However, QAIP 17-3, Appendix A is definitely in conflict with QAIP 6-3. Records and Quality Assurance personnel are developing a revision to QAIP 17-3 which removes Appendix A and places the LIFETIME - NONPERMANENT designation in the procedure that defines the record. This will both eliminate the current conflict and prevent the procedures from becoming out of sync with each other in the future. In the interim, the list of LIFETIME - NONPERMANENT records will be maintained as an appendix to the master file codes list. Also, the wording of QAIP 6-3 will be changed to clarify the fact that QAIP 6-3 generates no records; records are generated by the procedure which required the review (e.g. QAIP 5-1 for Quality Assurance Implementing Procedures). QAIP 5-1 will also be updated to require the LIFETIME - NONPERMANENT designation in the individual procedures.

BLOCK 15 - EXTENT OF CONDITION:

QAIP 17-3, revision 02, Appendix A has been compared to the individual procedures which call for the generation of records. It conflicts in many areas. The deficiency, however, appears to be confined to that Appendix; authors of Quality Assurance Implementing Procedures have been keeping records information up to date. Therefore, there is no need for either root cause analysis nor action to preclude recurrence.