



Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 98608
Las Vegas, NV 89193-8608
SEP 24 1996

L. D. Foust
Technical Project Officer
for Yucca Mountain
Site Characterization Project
TRW Environmental Safety Systems, Inc.
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Las Vegas, NV 89109

EVALUATION OF RESPONSES TO DEFICIENCY REPORTS (DR) YM-96-D-080, YM-96-D-083, YM-96-D-084, YM-96-D-085, YM-96-D-088, YM-96-D-090, AND PERFORMANCE REPORT (PR) YM-96-P-030 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION'S AUDIT YM-ARC-96-18 OF SANDIA NATIONAL LABORATORIES

The YMQAD staff has evaluated the responses to DRs YM-96-D-080, 083, 084, 085, 088, 090, and PR YM-96-P-030. The responses have been determined to be unsatisfactory because of reasons stated in the enclosed deficiency documents.

Amended responses are required to be submitted to this office within ten working days of the date of this letter. Send the original of your responses 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.

If you have any questions, please contact either Robert B. Constable at (702) 794-5580 or Richard L. Weeks at (702) 794-1431.

Robert B. Constable

YMQAD:RBC-2678

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

Enclosures:

1. DRs YM-96-D-080
YM-96-D-083 through YM-96-D-085
YM-96-D-088
YM-96-D-090
2. PR YM-96-P-030

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PDR WASTE
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102.7
wm-11

RECIP: NMSS/HLUR

SEP 24 1996

L. D. Foust

-2-

cc w/encls:

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 encls:

W. L. Belke, NRC, Las Vegas, NV
D. J. Harris, YMQAD/QATSS, Las Vegas, NV
R. L. Weeks, YMQAD/QATSS, Las Vegas, NV
D. G. Sult, YMQAD/QATSS, Las Vegas, NV
M. R. Diaz, DOE/YMQAD, Las Vegas, NV
D. G. Horton, DOE/OQA, Las Vegas, NV

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

ORIGINAL
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Deficiency Report

NO. YM-96-D080

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

QARD, Revision 5

2 Related Report No.

YM-AR-96-18

3 Responsible Organization:

SNL

4 Discussed With:

R. Richards, F. Schelling

5 Requirement/Measurement Criteria:

Section 6.2.7, Paragraph B., "Implementing documents shall describe the process to control expedited changes according to the following requirements."

Section 6.2.7, Paragraph B., 1., "The level of management with the authority to make expedited changes shall be identified."

Section 6.2.7, Paragraph B., 2., "The time limits for processing expedited changes through normal change process shall be specified."

6 Description of Condition:

Contrary to the above requirements, QAIP 20-1, Revision 03, "Technical Procedures," Section 4.2, NOTE 2: describes a process for Expedited Changes; however, 1) The level of management with the authority to make expedited changes is not explicitly identified. 2) The time limit for processing expedited changes through the normal change process is not specified. 3) The procedure does not provide the evaluation methodology, when the procedure work activity results in a change that is different from the expedited change. 4) The procedure does not provide the methodology for the PI to notify the author and others, as necessary, of the changes.

7 Initiator

Donald J. Harris

Date 8/1/96

9 Is condition an isolated occurrence?

☐ Yes

☒ No

☐ Unknown; Must be Yes if PR

10 Recommended Action: (Not required for PR)

Revise appropriate QAIP to incorporate minimum requirements as specified in QARD.

11 QA Review:

QAR Donald J. 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

Robert D. Constable

Date 8.7.96

22 Corrective Action Verified

QAR

Date

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

AOQAM

Date

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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:

N/A

19 Response by:

☒ Initial

☐ Amended

Chris F. Ell

Date 9/4/96

505
Phone 822-1544

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

9/5/96 BRADY & Spencer

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

8 ☐ Performance Report
☒ Deficiency Report

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PR/DR CONTINUATION PAGE

BLOCK 14 - REMEDIAL ACTIONS:

Evaluator had erroneously been given an outdated copy of QAIP 20-1. In fact, Revision 04 to QAIP 20-1 had been approved and issued. As can be seen from the attached copy of QAIP 20-1, Revision 04, Section 4.2, Step 1, Note 2, we have updated our QAIP as suggested by the evaluator and the current revision should be in compliance with QARD, Revision 5, Section 6.2.7. No further remedial action is required.

BLOCK 15 - EXTENT OF CONDITION:

Investigation showed that the only other procedure that provided for "expedited changes" is QAIP 1-5 governing Work Agreements. QAIP 1-5, section 4.3, Step 1, does indicate the "level of management" authorized to make expedited changes and the time limit for processing the change through normal change processing channels. QAIP 1-5 also states that work will be evaluated if the normal review process results in a change that is different from the temporary revision. Since the scope of expedited changes is very limited and clearly defined, there is no reason to perform a root cause determination or state action to preclude recurrence.