

Department of Energy

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

OCT 0 4 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

VERIFICATION OF CORRECTIVE ACTION OF DR YM-96-D-055 RESULTING FROM YMQA AUDIT YM-ARC-96-11 OF LLNL

The Yucca Mountain Quality Assurance staff has verified the corrective action to Deficiency Report YM-96-D-055 and determined the results to be unsatisfactory because the commitment to revise the procedure addressing procurement interfaces with Argonne National Laboratory, Pacific Northwest Laboratory, Lawrence Livermore National Laboratory and the Civilian Radioactive Waste Management System Management and Operating Contractor has not been executed.

Your response, indicating the appropriate corrective action completion date, 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, YMQA/QATSS, P.O. Box 98608, Mail Stop 455, Las Vegas, Nevada 89193-8608.

If you have any questions, please contact either Mario R. Diaz at (702) 794-1489 or John E. Therien at (702) 794-5408.

YMQA:MRD-<del>2779</del> ₩

Richard E. Spence

Yucca Mountain Quality Assurance

Enclosure:

DR YM-96-D-055

9610080385 961004 PDR

YMP-5

Reap: NMSS/ HLUR

cc w/encl:

CC W/enci:
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
J. A. Blink, M&O/LLNL, Las Vegas, NV
R. E. Monks, M&O/LLNL, Livermore, CA
Records Processing Center

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cc w/o encl:
W. L. Belke, NRC, Las Vegas, NV
J. E. Therien, YMQA/QATSS, Las Vegas, NV
D. G. Sult, YMQA/QATSS, Las Vegas, NV

D. G. Horton, DOE/OQA, NV

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# **OFFICE OF CIVILIAN**

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|   | VE WASTE MANAGE               |                                       | 10-76-D-033                    |
|---|-------------------------------|---------------------------------------|--------------------------------|
| U.S. DEPARTMENT OF ENERGY   |                               |                                       | DS 9/9/                        |
| WASHINGTON, D.C.  |                               |                                       | PAGE 1 OF 2                    |
|   |                               |                                       | QA: L                          |
| PERFORMA  | NCE/DEFICIENCY REF            | PORT                                  |                                |
|   | TOD/DELIGIENCE TIE            | 2 Related Re                          | post No                        |
| 1 Controlling Document:<br>033-YMP-QP 4.1, Revision 3, CN 4.3-3-1, CN 4.1-3-2 |                               | YM-ARC-96                             |                                |
| 3 Responsible Organization:<br>Lawrence Livermore National Laboratory (LLNL)  | 4 Discussed With:<br>R. Monks | •                                     |                                |
| 5 Requirement/Measurement Criteria:   | •                             |                                       |                                |
| Sections 4.1.5.4.1 and 4.1.5.4.3 requires that the QA Ma                      |                               |                                       |                                |
| Specification and revise this specification, as appropriate                   |                               |                                       |                                |
| Specification, Task Leaders are to review and revise, as                      | appropriate, Subcontract QA   | Requirements Sp                       | ecifications.                  |
|   | • •                           |                                       |                                |
|   |                               |                                       |                                |
|   |                               |                                       |                                |
| *   |                               |                                       |                                |
|   |                               |                                       |                                |
|   |                               |                                       |                                |
| 6 Description of Condition:   |                               | · · · · · · · · · · · · · · · · · · · |                                |
| The Generic QA Requirements Specification has not been                        |                               | there evidence th                     | at this Specification has been |
| reviewed vis-a-vis the various QARD revisions issued si                       | nce July 1991.                |                                       | •                              |
|   |                               |                                       |                                |
| The Subcontract QA Requirements Specification for Arg                         |                               |                                       |                                |
| have not been revised since September 1992, although a respectively.          | nnuai evaluations were perior | med in October a                      | ing reducity of 1995,          |
| respectively.   |                               |                                       | •                              |
|   | •                             | ·                                     |                                |
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|   | •                             |                                       |                                |
|   |                               |                                       | •                              |
| 7 10 10 10 10 10 10 10 10 10 10 10 10 10                                      | 10000                         |                                       |                                |
| 7 Initiator   | 9 QA Review                   | 0-11/                                 | - • •                          |
| John E. Therich Of Therit Date 4/3  | 30/96 QAR                     | 7. Them                               | Date 4/30/4/                   |
| 10 Response Due Date  | 11 QA Issuance A              | pp/oval                               |                                |
| 20 Working Days From Issuance   | OAR (PRI/ADDA                 | 1//na                                 | Date 4/30/91                   |
| 12 Remedial Actions:  | GAN II III/AOGA               | 11 70111                              | 00112/3/70                     |
| OARS I was I was a last a Nobel of  | . Als adms of also sud        | de TINT b                             | d no contracts                 |
| QARSs have been canceled. Note: at with suppliers where the QARSs are         |                               | IIC, LLNL III                         | id no contracts                |
| with suppliers where the QAKSS are  | Involved.                     |                                       |                                |
|   |                               |                                       | ·                              |
|   |                               | •                                     |                                |
|   |                               |                                       |                                |
| •   |                               |                                       | •                              |
|   | •                             |                                       | •                              |
| 3 Remedial Action Response By:  | 14 Remedial Actio             | n Due Date                            |                                |
| Date ( . 4  | -<( July 31,                  | 1006                                  | Date                           |
| 15 Remedial Action Response Acceptance  | 16 PR Verification            |                                       | Ualt                           |
|   | TO EN VERNICATION             | /C+U3UIE                              |                                |
| QAR Date  | QAR                           |                                       | Date '                         |

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

| E<br>DR NO | YMQAD-96-D055 |     |   |
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#### **DEFICIENCY REPORT**

#### 17 Recommended Actions:

Determine if the QA requirements invoked on ANL and PNL work is consistent with present QARD requirements. Evaluate the methodology in QP 4.1 to determine if this process is consistent with LLNL current procurement needs. Examine the procurement interfaces associated with ANL, PNL, LLNL and the Civilian Radioactive Waste Management System Management and Operating Contractor.

18 Investigative Actions: A review of ANL and PNL QA Program Plans by the LLNL QA staff and LLNL technical representative during annual evaluations shows that appropriate QARD requirements were implemented by the contract laboratories.

YMP-QP 4.1 was not consistent with current work practices and has been canceled. The M&O now contracts directly for ANL and PNL work. LLNL technical staff reviews, or may be required to review, work results and provide technical direction to ANL and PNL as part of LLNL's assigned responsibilities for the M&O. This information is provided to and through the M&O. LLNL may provide technical evaluation data in future ANL and PNL annual evaluations.

19 Root Cause Determination:

Procedures were not revised to reflect current work practices.

#### 20 Action to Preclude Recurrence:

Cancellation of procedure will preclude its use.

Procurement interfaces with ANL, PNL. LLNL, and TRW should be addressed in TRW procedure revision when it is published.

| 21 Response by:                | .22 Corrective Action Completion Due Bate: |
|--------------------------------|--|
| Tom 1001 P Date 6 4-96         | August 31, 1996                            |
| 23 Response Accepted           | 24 Response Accepted                       |
| OAR Date                       | ADDAM PARE                                 |
| 25 Amended Response Actionted  | 26 Amended Resonnse Acqueted Q             |
| OAR 186 8. Horis Date 8/26/96  | ADDAM COMODE 100109-3-96                   |
| 27 Corrective Actions Verified | 28 Closure Approved by:                    |
| QAR Date                       | AOQAM Date                                 |

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

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### PR/DR CONTINUATION PAGE

Block 22. Corrective Action Completion Due Date Addition of date: August 31, 1996