



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

OCT 04 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

**ISSUANCE OF DR YM-96-D-104 RESULTING FROM YMQA SURVEILLANCE
YMP-SR-96-023**

Enclosed is Deficiency Report (DR) YM-96-D-104 generated as a result of Yucca Mountain Quality Assurance Surveillance YMP-SR-96-023.

Please identify the corrective action to be taken and implemented to correct the deficiency. Send the original of your response to Deborah Sult, YMQA/QATSS, P.O. Box 98608, Mail Stop 455, Las Vegas, Nevada 89193-8608. Response to the DR is due 20 working days from the date of this letter. Any extension to the due date must be requested in writing, with appropriate justification, prior to the due date.

If you have any questions, please contact either Mario R. Diaz at (702) 794-1489 or Franklin B. Smith at (702) 794-1329.

Richard E. Spence
Yucca Mountain Quality Assurance

0004
YMQA:MRD-2780-*ma*

Enclosure:
DR YM-96-D-104

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
Records Processing Center

cc w/o encl:
W. L. Belke, NRC, Las Vegas, NV
D. G. Sult, YMQA/QATSS, Las Vegas, NV
M. R. Diaz, DOE/YMSCO, NV
D. G. Horton, DOE/OQA, NV

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Recip: NMSS/HWR

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

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: U S. Department of Energy/RW-0333P, Quality Assurance Requirements and Description (QARD), Revision 5		2 Related Report No. SR-96-023					
3 Responsible Organization: Civilian Radioactive Waste Management System Management and Operating Contractor		4 Discussed With: J. Verden, J. Herbert					
5 Requirement/Measurement Criteria: Section 5.2 states: " Work shall be performed in accordance with controlled implementing documents." YAP-17.1Q, Revision 0, Section 5.3.3.a and 7 states: "Refer to Attachment 9.5 Record Preparation, for requirements to identify, generate, and prepare records for retention in the Records Management System (RMS) to insure QA records are completed appropriate to the work accomplished." Attachment 9.5 states in part: "When parts of a record are intentionally obliterated, a statement signed and dated by the appropriate Record Source (RS) shall be included with the record that indicates that the obliterated information does not impact the technical meaning or content of the record. Unintentional obliterations will be corrected per Attachment 9.4. Record data on records and drawings in dark markings against a light background. Statements indicating that blank lines and spaces are intentional shall specify the pages of the affected blanks. Ensure that records packages are legible." (See Page 3)							
6 Description of Condition: QA records packages accepted and in storage at the RMS have been changed/corrected, obliterated, and enhanced without the identification of the authorized person and the date when those changes took effect. Furthermore, some of these are illegible, with intentional blanks and spaces without any explanatory statements; some have been corrected after authentication took place without being approved by the originating organization. Examples are: <table border="1"><thead><tr><th>Accession Number</th><th>Adverse Conditions</th></tr></thead><tbody><tr><td>MOY. 960528-07</td><td>Records corrected after authentication without documented evidence of originating organization approval.</td></tr></tbody></table> (See Page 3)				Accession Number	Adverse Conditions	MOY. 960528-07	Records corrected after authentication without documented evidence of originating organization approval.
Accession Number	Adverse Conditions						
MOY. 960528-07	Records corrected after authentication without documented evidence of originating organization approval.						
7 Initiator M. R. Diaz <i>M. R. Diaz</i> Date 9/19/96		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 Actions: (Not required for PR) 1. Correct the QA records identified as deficient in accordance with procedural requirements. 2. Review and evaluate other QA records to verify compliance with these requirements and make appropriate corrections of deficient records. Provide objective evidence of review, evaluation, and corrective actions taken.							
11 QA Review: QAR <i>M. R. Diaz</i> Date 9-30-96		12 Response Due Date 20 working days from issuance					
13 Affected Organization QA manager Issuance Approval: (QAR for PR) Printed Name <i>Richard E. Sence</i> Signature <i>Richard E. Sence</i> Date 10/3/96							
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:

15 Extent of Condition: (Not required for PR)

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:

19 Response by:

☐ Initial

☐ Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

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PR/DR CONTINUATION PAGE

5 Requirement/Measurement Criteria: (continued)

Attachment 9.4 states in part: "Changes/corrections to errors shall be made by drawing a single line through the changed/incorrect information and inserting the new information in close proximity along with the initials or signature of the RS or person authorized to make the change/correction and the date the change/correction was made. Insertions and enhancements (e.g., darkening, faint, illegible characters) are considered changes.

To be accepted, records determined to be incomplete or illegible shall be corrected by the RS or authorized individual. Any correction or change of a QA record after authentication shall be approved by the originating organization."

6 Description of Condition: (continued)

<u>Accession Number</u>	<u>Adverse Conditions</u>
MOL.19960731.0245	a) Contains 19 Field Station Data Sheets. Several of them have been corrected without following procedural requirements (drawing a single line through the changed information and inserting the new information in close proximity along with the initials of the RS or authorized person to make the correction and date the correction was made). b) In some cases a line was drawn but the corrected information was not recorded. c) Contains Sheet 27 of the NE/4 BUSTED BUTTE 7.5" QUADRANGLE (which is a map) with recorded information against a dark background which makes it in some cases illegible.
MOL.19960711.0316	a) Contains forms called Tbm data sheet.xls dated 2/22, 23, 29/96 which have been corrected without following procedural requirements. b) Some of the forms are missing the date when they were used. c) Blanks and spaces were intentionally left without the required clarification statement.
MOL.19960717.0122	a) Contains Key Technical Data Traceability form that has been corrected without following procedural requirements. b) Scientific Notebook with several corrections without following procedural requirements. c) Contains Observers Report forms with over 35 empty spaces where entries should be made. However, a required statement to identify those pages in the records package does not exist.
MOL.19960716.0132	Scientific Notebook with corrections made without following procedural requirements.
DRC.19960718.0001	a) In page 4 of Job Package 93-02A correction made without following procedural requirements. b) Daily Drilling Report forms corrections made without following procedural requirements. c) Core Run Record forms corrections made without following procedural requirements.
MOL.19960812.0274	Some Meteorological Equipment Performance Check or Audit forms show some blanks made without following procedural requirements.
MOL.19960812.0303	a) Page 34 of 56, corrections made without initials and date. b) Page 43 of 56, recorded information done by a computer was manually enhanced without following procedural requirements. c) Page 50 of 56, corrections made without following procedural requirements. d) Page 52 of 56, recorded information done by a computer was manually enhanced without following procedural requirements. e) Page 56 of 56, corrections made without following procedural requirements.