



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

OCT 28 1996

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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 SURVEILLANCE RECORD YMP-SR-96-023 RESULTING FROM YMQA
SURVEILLANCE OF THE CRWMS M&O AND KIEWIT/PB**

Enclosed is the record of Surveillance YMP-SR-96-023 conducted by Yucca Mountain Quality Assurance at the Civilian Radioactive Waste Management System Management and Operating Contractor and Kiewit/Parsons Brinckerhoff facilities at the Yucca Mountain Site, Nevada, September 16-20, 1996.

The purpose of the surveillance was to verify records access, retrievability, and compliance with requirements of the Quality Assurance Requirements and Description document of Yucca Mountain Site Characterization office records.

One Deficiency Report (DR) was issued as a result of this surveillance. Response to the DR, which was transmitted via separate letter, is due by the date indicated in Block 12.

This surveillance is considered completed and closed as of the date of this letter. A response to this surveillance record is not required; however, the open DR will continue to be tracked until it is closed to the satisfaction of the quality assurance representative and the Director, Office of Quality Assurance.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Kenneth T. McFall at (702) 794-5470.

James Blaylock
Richard E. Spence
Yucca Mountain Quality Assurance

YMQA:JB-0188

Enclosure:
Surveillance Record YMP-SR-96-023

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9611050140 961028
PDR WASTE
WM-11 PDR

YMP-5

OCT 28 1996

L. D. Foust

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cc w/encl:

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102.7

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Recip: NMSS/PaHL

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

QUALITY ASSURANCE SURVEILLANCE RECORD

SURVEILLANCE DATA

¹ORGANIZATION/LOCATION:
Civilian Radioactive Waste
Management System
Management and Operating
Contractor (CRWMS M&O), Las
Vegas, Nevada

²SUBJECT:
Yucca Mountain Site Characterization Office
(YMSCO), Records access, retrievability, and
compliance with the Quality Assurance
Requirements and Description (QARD)
requirements.

³DATE:
9/3/96

⁴SURVEILLANCE OBJECTIVE:
Evaluate the accessibility, retrievability, and compliance with the QARD requirements and the Yucca Mountain Site
Characterization Project Administrative Procedure (YAP)-17.1Q, "Records Management Requirements and
Responsibilities."

⁵SURVEILLANCE SCOPE:
Determine accessibility of selected documents from the Records Processing
Center, timeliness of retrievability, and compliance with the record source
requirements of Section 17 of the QARD, as well as compliance with selected
requirements from YAP-17.1Q.

⁶SURVEILLANCE TEAM:
Team Leader:

Kenneth T. McFall

Additional Team Members:

Mario R. Diaz

⁷PREPARED BY:
Kenneth T. McFall
Kenneth T. McFall
Surveillance Team Leader
9/10/96
Date

⁸CONCURRENCE:
N/A
QA Division Director
Date

SURVEILLANCE RESULTS

⁹BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:
See Page(s) 2-6

¹⁰SURVEILLANCE CONCLUSIONS:
See Page(s) 6

¹¹COMPLETED BY:
Kenneth T. McFall
Kenneth T. McFall
Surveillance Team Leader
10-16-96
Date

¹²APPROVED BY:
James B. Bradford
James B. Bradford
QA Division Director
10/25/96
Date

Block 9 (continued) BASIS OF EVALUATION/DESCRIPTION OF OBSERVATIONS:

On September 16 through 20, 1996, a surveillance was performed of the CRWMS M&O Records Management Organization at their offices in the Bank of America Building and Hillshire facility in Las Vegas, Nevada. The surveillance was conducted on a part-time basis during those five days. The purpose of the surveillance was to determine the accessibility, retrievability, and compliance with the Record Source Responsibilities and Requirements of Section 17 of the QARD as well as selected requirements from YAP-17.1Q, Revision 0, "Records Management Requirements and Responsibilities."

YAP-17.1Q, Revision 0, Paragraph 5.2.2, requires that records retrieval be performed in a timely manner. Specific documents were selected for retrievability from the Records Processing Center based on historical difficulty in retrieval, age of the documents, and known submittal dates. The following documents were selected for retrieval:

- a) QARD DOE/RW 0214, Revision 2
- b) QARD DOE/RW 0214, Revision 1
- c) Records package for Standard Deficiency Report (SDR) #18
- d) Records package for Quality Assurance Audit YM-ARP-96-005

The retrievability of the documents was reviewed for time of retrieval, completeness of the document, quality and legibility of the records copy, and ease of retrieval when searching by document title, accession number, and subject matter. The results of the review for the above mentioned documents are presented below:

- a) The Accession Number was HQO.900208.0004. The time of retrieval was 15 minutes from submittal request to viewing on the microfiche reader. The document was located on microfiche reel 70256, frames 1816 to 1908. The document was complete, clear, and legible. The request was made by supplying the specific title of the document.
- b) The Accession Number was HQO.881027.0006. The time of retrieval was 25 minutes from submittal request to viewing on the microfiche reader. The document was located on microfiche reel 70044, frames 3184 to 3246. The document was complete, clear, and legible. The request was made by supplying the specific title of the document.
- c) The Accession Number was NNA.930201.0005. The time of retrieval was 10 minutes from submittal request to viewing on the microfiche reader. The records package was located on microfiche reel number 9113000, from 3789 to 3823. All the documentation contained in the table of contents of the records package was present, the package was complete, clear, and legible. The request was made by supplying the number of the SDR.

- d) The Accession Number was MOL.19960606.0067. The time of retrieval was less than 10 minutes from submittal request to viewing on a computer screen. All the documentation contained in the records package table of contents was present, the package was complete, clear, and legible. The request was made by supplying the number of the audit. It should be mentioned that in the spring of 1994, records were no longer microfilmed; instead they began an imaging process which allows direct viewing of records on a computer screen. Records processed prior to the spring of 1994 must still be viewed on a microfiche reader.

Paragraph 5.2.2 NOTE requires that access to storage facilities be controlled and a list maintained designating personnel permitted access to the Quality Assurance (QA) records. Three areas in the Records Processing Center were examined, specifically:

- a) Indexing room
- b) Imaging room
- c) Quality Control room

Each of the above mentioned areas had a list of personnel authorized to access records signed by Terri Badredine dated May 28, 1996.

Paragraph 5.3.4 requires the Research and Study Center to obtain copies of cited references identified by Affected Organizations/Record Sources (AO/RS) and include them in its collection. One publication examined, titled "Engineered Materials Characterization Report for the Yucca Mountain Site Characterization Project," by R. A. Van Konynenburg et al, was published in September 1995. A letter dated September 15, 1996, transmitted the document reference list to the Research and Study Center, also known as the Technical Information Center (TIC). There were a total of 31 cited references on the list, of which the TIC had all but four on hand. The remaining four have been researched for acquisition and ordered. As submittals come in to the TIC, they are logged in and the cited references are compared to the materials already located in the TIC. Anything not on hand is researched for acquisition and ordered. If a reference is out of print or otherwise not available, the author of the submittal is requested to provide a hard copy. Completing the reference gathering occasionally can be a rather lengthy process.

The following QA records packages were reviewed for verification of compliance with the record source requirements of YAP-17.1Q:

Accession (MOL) or batch (MOY) Number

MOY-960528-07	MOY-960719-01
MOY-960904-01	MOL.19960731.0245
MOL.19960715.0110	MOL.19960711.0316
MOL.19960717.0122	MOL.19960716.0132
DRC.19960718.0001	MOL.19960722.0010
MOL.19960812.0274	MOL.19960812.0303
MOL.19960722.0041	MOL.19960711.0293

The above QA records packages were examined for compliance with the following requirements:

Paragraph 5.1.4.d requires the AO to make corrections in accordance with Attachment 9.4, "Correction of Records;"

Paragraph 5.3.3.a requires the AOs/RSs to refer to Attachment 9.5, "Record Preparation," for requirements to identify, generate, and prepare records for retention in the Records Management System (RMS) to include:

Paragraphs 5.3.3.a.2, 6, 7, and 8 require the AOs/RSs to determine the appropriate traceability designator to be placed on records or records packages; to classify QA records and records packages as either lifetime or nonpermanent; to ensure QA records are completed appropriate to the work accomplished; and authenticate the QA records.

Paragraphs 5.3.2.a and .b require the CRWMS M&O Records Management Organization to accept records from the AOs/RSs for processing into the Yucca Mountain Project Records Information System and provide Records Package Tracking Numbers and temporary storage for records package segments submitted by the AOs.

Paragraphs 5.4.2.a and .b require the AOs/RSs to establish a system to ensure corrections to records and to correct noted discrepancies according to the instructions in Attachment 9.4

Attachment 9.4, "Correction of Records," 2a and b, requires that:

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 person authorized to make the change/correction and the date the change/correction was made.

NOTE: Insertions and enhancements (e.g., darkening faint, illegible characters) are considered changes. Markups on documents being reviewed for the purpose of providing comments are not considered changes and do not need to be dated and initialed.

To be accepted, records determined to be incomplete or illegible shall be corrected by the RS or authorized individual in one of the following ways:

- 1) transcribing, regenerating, or enhancing the illegible portion; or
- 2) obtaining and submitting a new complete, legible record

Attachment 9.5, "Record Preparation:"

The RS prepares documents generated or received that will become records according to the following:

Create record titles that concisely identify and describe the contents of the record in order to enable future identification, traceability to associated items and/or activities, and timely retrieval.

Verify that no portions of a page are missing due to tearing or folding of record edges, and that no information is obliterated. Unintentional obliterations will be corrected per Attachment 9.4. When parts of a record are intentionally obliterated, a statement signed and dated by the appropriate RS shall be included with the record that indicates that the obliterated information does not impact the technical meaning or content of the record.

Identify privileged records and ensure that they are clearly labeled as such.

Record data on records and drawings in dark markings against a light background. Create blackline prints of drawings as opposed to blueline prints or sepia copies, when possible. Submit only the white first page of "No Carbon Required" forms, or a photocopy.

Ensure that records and record packages contain all pages. All attachments shall be included with individual records unless the attachments or enclosures are identified as not being record material or are identified as being previously processed into the records management system (identify accession number). The attachments shall also meet the requirements of this procedure.

Ensure that records contain all required information.

QA records generated by an AO shall have all blank lines and spaces accounted for in a manner that is specific to the record in accordance with the governing procedure.

Statements indicating that blank lines and spaces are intentional shall specify the pages of the affected blanks.

Ensure that records and record packages are legible.

Ensure that record packages include a table of contents that lists the individual records (or groups of records) that constitute the packages, indicates the page count for those records (or groups of records), and has been signed and dated. When known, RSs shall provide cross-references by listing related records/records packages (Study Plans, Job Packages, Test Planning Packages, etc.).

Place traceability designators on the front page of a record or record package table of contents and identify them as traceability designators based on the implementing procedures that describe them.

Place a designation of QA: L or QA: N to classify QA records as lifetime or nonpermanent, respectively, on the first page of individual QA records and on the first page of the table of contents of QA records packages. (Records package segments do not require a separate designation).

Personnel Contacted During the Surveillance:

P. Dahlberg, QA Specialist for Records Services, M&O/IRG
M. Dorsey, Technical Information Center Supervisor, M&O/TRW
J. Herbert, Technical Lead for RDMS, M&O/TRW
K. Jerome, Records Technician II, M&O/TRW
T. Mueller, Records Services Supervisor, M&O/TRW
K. Quinnell, Assistant Technical Editor, M&O/TRW
C. Shannon, Records Technician II, M&O/TRW
D. Warriner, YMSCO Records Manager, DOE/YMSCO
J. Verden, Records Management Manager, M&O/TRW

Block 10 (continued) SURVEILLANCE CONCLUSIONS:

With the exception of the items noted below, the surveillance results indicated that the selected requirements of the QARD and YAP-17.1Q, Revision 0, are being satisfactorily implemented. The surveillance team wishes to express their thanks to the records organization for their help and cooperation during the surveillance.

Implementation of the following items or attributes were found to be unsatisfactory and resulted in the issuance of Deficiency Report YM-96-D-104.

- a) Corrections, changes, and obliterations to QA records
- b) Enhancements of QA records
- c) Legibility of QA records
- d) Spaces left blank in QA records without proper explanations
- e) Corrections of records after being authenticated as QA records

The following recommendation resulted from the surveillance:

In order to expedite the QA records process, a list containing the names, signatures, and initials of those individuals authorized to make corrections to QA records should be available at the RMS office.