



Department of Energy

Washington, DC 20585

NOV 26 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

EVALUATION OF RESPONSE TO DR YM-96-D-103 RESULTING FROM OQA SURVEILLANCE YMP-SR-96-027 OF CRWMS M&O

The Office of Quality Assurance staff has evaluated the response to Deficiency Report YM-96-D-103. The response has been determined to be unsatisfactory because further information is needed as to completion of corrective action and to address the submission of Borehole Completion Reports by the Civilian Radioactive Waste Management System Management and Operating Contractor.

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 G. Sult, OQA/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 Mario R. Diaz at (702) 794-1489 or John R. Doyle at (702) 794-1465.

[Handwritten signature of Donald G. Horton]

Donald G. Horton, Director
Office of Quality Assurance

OQA:MRD-0412

Enclosure:
DR YM-96-D-103

cc w/encl:
T. A. Wood, DOE/HQ (RW-55) FORS
J. G. Spraul, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
B. R. Justice, M&O, Las Vegas, NV
Records Processing Center

cc w/o encl:
W. L. Belke, NRC, Las Vegas, NV
J. R. Doyle, OQA/QATSS, Las Vegas, NV
D. G. Sult, OQA/QATSS, Las Vegas, NV

Handwritten notes: Wm-11, 102.7, NH33, and a vertical line with a slash.

9612030260 961126
PDR WASTE
WM-11 PDR
030044

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

THIS IS A PERFORMANCE REPORT
 Deficiency Report
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Yucca Mountain Site Characterization Project Administrative Procedure (YAP)-13.1Q, Revision 0
 2 Related Report No. YMP-SR-96-027

3 Responsible Organization: Civilian Radioactive Waste Management System Management and Operating Contractor
 4 Discussed With: Steven C. Smith, Jon M. White

5 Requirement/Measurement Criteria:
 YAP-13.1Q, "Borehole Security and Access," Revision 0

1. Paragraph 5.1.1b) states: "The Requestor: completes and submits a BAR to the DOE FTC or designee for approval"
 Paragraph 5.1.2b) states: "The DOE FTC: documents the authorization of the borehole key to be issued to the Requestor and the date the requestor is required to submit a Borehole Status Report (BSR)"
 Paragraph 5.2.1a) states: "The Requestor: provides status of borehole activities to the DOE FTC by completing a BSR in accordance with format criteria described in Section 6..."
 Paragraph 5.2.1b) states: "The Requestor: submits the BSR to the DOE FTC in accordance with the schedule noted on the BAR"

(See Page 3)

6 Description of Condition:
 1. A review of Borehole Access Requests (BAR) reveals that contrary to above requirements, BSRs have not been submitted as per schedules provided for the following boreholes:

Borehole	Date Authorized	Duration of Access	Status Reports Due
USW H-3, USW H-3, USW H-4 and USW H-6	5/2/95	Three Years	Quarterly
USW G3	5/2/95	Three Years	Quarterly
UE-25 NGR#5	5/2/95	Three Years	Quarterly
USW UZ-6s	5/2/95	Three Years	Quarterly
UE-25b #1	5/2/95	Three Years	Quarterly
Well J 11 and J 12	5/2/95	Three Years	Quarterly

(See Page 3)

7 Initiator: *Richard L. White for*
 John R. Doyle Date 10/4/96
 9 Is condition an isolated occurrence?
 Yes No Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)

- Submit required documentation in accordance with the requirements cited above.
- Conduct an evaluation to determine which Affected Organizations have obtained access to boreholes. Verify compliance to Yucca Mountain Site Characterization Project Administrative Procedure (YAP)-13.1Q. Provide a written report on the results of this evaluation including a description of corrections taken, as appropriate.

11 QA Review: *Richard L. White for*
 QAR John R. Doyle Date 10/4/96
 12 Response Due Date
 20 Working Days From Issuance

13 Affected Organization QA manager Issuance Approval: (QAR for PR)
 Printed Name *Richard E. Spence* Signature *[Signature]* Date *10/9/96*

22 Corrective Action Verified
 QAR Date
 23 Closure Approved by: (N/A for PR)
 AOQAM Date

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Block 5 Requirement/Measurement Criteria: (continued)

2. Paragraph 5.3.1 states: "Upon the completion of borehole activity, the Requestor:
- a) ensures that the cap is tightly secured on the borehole after each episode, and that the cap cannot be removed without unlocking
 - b) completes and signs a Borehole Completion Report (Exhibit YAP-13.1.Q.2)(BCR); and
 - c) returns the key and submits the BCR to the DOE FTC when access to the borehole is no longer required"

Block 6 Description of Condition: (continued)

2. A review of BARs reveals that contrary to the above requirements, no keys or BCRs have been submitted to the DOE FTC for the following boreholes:

Borehole	Date Authorized	Duration of Access
USW SD-9	1/25/95	4 Weeks
USW UZ-6	5/25/95	One Year
USW UZ-7a	8/22/95	One Month

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

1. Issue a notice to the principal manager of responsible party, directing submittal of all outstanding BSRs on or before COB of February 10, 1997. (NOTE: prior requests to USGS regarding submittal of required BSR have been issued on a number of occasions)
2. Issue notice to responsible party requesting notification of future intentions for boreholes whose access approval is expired (extension of BAR or submittal of BCR).
3. Review all open borehole access approvals, cancelled all expired access approvals, and replaced those identified as needing extended access by the appropriate responsible manager with new access approvals.
4. Archive all necessary records in accordance with procedure. See continuation page for responsibility and completion dates. See Continuation Sheet.

15 Extent of Condition: (Not required for PR)

Based on examination of the records for borehole access control, the following are non-compliant with the cited requirements:

1. USGS for failure to submit BSRs since July 24, 1995 for the following boreholes: USW SD-9, USW UZ-6, USW UZ-7a, USW G-2, USW SD-7, USW H-1, USW H-3, USW H-4, USW H-5, USW H-6, USW G-3, UE-25 NRG#5, USW UZ-6s, UE-25 b#1, UE-25 J-11, UE-25 J-12, UE-25 J-13, UE-25 p#1, USW WT-1, USW WT-2, UE-25 WT-3, UE-25 WT-4, UE-25 WT-6, USW WT-7, USW WT-10, USW WT-11, UE-25 WT-12, UE-25 WT-13, UE-25 WT-14, UE-25 WT-15, UE-25 WT-16, UE-25 WT-17, UE-25 WT-18, USW VH-1, UE-25 JF-3, UE-29 a#1, UE-29 a#2, USW UZ-14, UE-25 UZ-16, and (see continuation sheet)

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:

01/02/97

19 Response by: Steven Smith

- Initial
 Amended

Steven Smith
Date 11/07/96 Phone 295-4234

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

11/7/96

LV-GSD.SCS.11/96-008

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Continuation of box 14, Remedial Actions:

Revise procedure YAP-13.1Q as follows:

5. Eliminate Borehole Status Report (BSR) and Borehole Closure Report (BCR) requirement. Reports do not add value to the process and only serve to consume time and budget. The same objective can be accomplished with a log.
6. Replace all forms with a simple signout log for access control and closure of access.

Improve operations as follows:

7. Increase aggressiveness in requesting issuance of Deficiency Reports against non-compliant team-mates.

Of the above items, 5 and 6 are based on direct recommendations from the Surface Based Test Coordination Office. See continuation page for responsibility and completion dates.

NOTE: Procedure YAP-13.1Q is currently in revision to accomplish, among other things, items 1 and 2 above.

Continuation of box 15, extent of conditions:

UZN boreholes 1 through 84 and 86 through 98. Currently, quarterly BSRs are required for each of the above boreholes until cancellation of access is requested or access approval expires.

2. USGS failed to renew BARs or submit BCRs for the following boreholes : U SW SD-9, USW UZ-6, USW UZ-7a, USW G-2, and USW SD-7.

NOTE: Currently, all other participants are covered under procedure NLP-2-4 for the protection and access control of YMP boreholes. Assessment of non-compliance under NLP-2-4 will be executed and steps similar to those identified in box 14 will be implemented as appropriate.

Continuation of box 18, Corrective Action Completion Due Dates:

Box 14, item 1 -due on or before 11/19/96, Assigned to Steven Smith, compliance by objective evidence.

Box 14, item 2 -due on or before 11/15/96, Assigned to Steven Smith, compliance by objective evidence.

Box 14, item 3 -due on or before 11/15/96, Assigned to Steven Smith, compliance by objective evidence.

Box 14, item 4 -due on or before 11/15/96, Assigned to Steven Smith, compliance by objective evidence.

Box 14, item 5 -due on or before 1/2/97, Assigned to Steven Smith, compliance by objective evidence.

Box 14, item 6 -due on or before 1/2/97, Assigned to Steven Smith, compliance by objective evidence.

Box 14, item 7 -due on or before 11/15/96, Assigned to Steven Smith, compliance by objective evidence.