



Department of Energy

Washington, DC 20585

DEC 23 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 DEFICIENCY REPORT (DR) YM-96-D-101
RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) SURVEILLANCE
YMP-SR-96-026 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM
MANAGEMENT AND OPERATING CONTRACTOR**

The OQA staff has evaluated the response to DR YM-96-D-101. The response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this date must be requested in writing, with appropriate justification, prior to that date. Please send a copy of extension requests to Deborah G. Sult, OQA/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 Patrick V. Auer at (702) 794-1432.

James Blaylock for
Donald G. Horton, Director
Office of Quality Assurance

OQA:MRD-0574

Enclosure:
DR YM-96-D-101

cc w/encl:
T. A. Wood, DOE/HQ (RW-55) FORS
J. O. Thoma, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
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P. V. Auer, OQA/QATSS, Las Vegas, NV
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R. W. Clark, DOE/OQA, Las Vegas, NV

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

ORIGINAL
DEFICIENCY REPORT
NO. YM-96-D-101
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

Quality Assurance Requirements and Description
(QARD)/RW-0333P, Revision 5

2 Related Report No.

YM-SR-96-026

3 Responsible Organization:

Civilian Radioactive Waste Management System
Management and Operating Contractor (CRWMS
M&O)

4 Discussed With:

John Clark

5 Requirement/Measurement Criteria:

QARD, Revision 5, Section 2.2.10, states, in part: "Mandatory comments resulting from the review shall be documented and resolved before approving the document," and Section 5.2.2 states, in part: "Implementing documents shall include the following information as appropriate to the work to be performed: ... Methods for demonstrating that the work was performed as required ..."

6 Description of Condition:

Contrary to the above: CRWMS M&O Quality Administrative Procedures (QAP)-3-8, "Specifications," QAP-3-9, "Design Analysis," and QAP-3-10, "Engineering Drawings," do not specify a method to identify which review comments are designated "mandatory" by the reviewer and do not specify a method to document resolutions of "mandatory" comments.

7 Initiator

Patrick V. Auer *Patrick V. Auer* Date 9-16-96

9 Is condition an isolated occurrence?

☐ Yes ☐ No ☒ Unknown; Must be Yes if PR

10 Recommended Action: (Not required for PR)

Revise the procedures cited in Block 6 to implement the QARD requirements identified in Block 5.

11 QA Review:

QAR Patrick V. Auer

Patrick V. Auer Date 9-16-96

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 B. Conable*

Date 9.17.96

22 Corrective Action Verified

QAR

Date

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

AOQAM

Date

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

PR/DR NO. YM-96-D-101

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

SEE PR/DR CONTINUATION PAGE (PAGE 3)

15 Extent of Condition: (Not required for PR)

SEE PR/DR CONTINUATION PAGE (PAGE 3)

16 Root Cause Determination: (Not required for PR)

Required ☐ Yes ☒ No

SEE PR/DR CONTINUATION PAGE (PAGE 3)

17 Action to Preclude Recurrence: (Not required for PR)

Required ☐ Yes ☒ No

SEE PR/DR CONTINUATION PAGE (PAGE 3)

18 Corrective Action Completion Due Date:

MAY 30, 1997

19 Response by: ALDEN M. SEGREST

☒ Initial

☐ Amended

Date 12-2-96 Phone (702) 794-1924

20 Response Accepted

QAR

Patricia V. Qura

Date 12-6-96

21 Response Accepted (N/A for PR):

AOQAM

James B. Langford

Date 12/19/96

12/2/96 LV.MG JJC. 12/96-084

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

8 ☐ Performance Report
☒ Deficiency Report

NO. YM-96-D-101

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PR/DR CONTINUATION PAGE

BLOCK 14 REMEDIAL ACTIONS

Past experience in MGDS Development has proven that it is more effective not to separate editorial from mandatory comments resulting from reviews of design products. As a result of this conclusion, MGDS Development treats all comments as mandatory and all have been and are resolved. We propose to resolve this subject deficiency by generating a PAR for revising procedures QAP-3-8, QAP-3-9 and QAP-3-10. The PAR will add a specific statement in the body of the procedure that when the reviewer signs the REVIEW SUMMARY RECORD the reviewer agrees that review comments made are either incorporated or satisfactorily resolved. (NOTE: This is already in all three procedures in the form instructions.) The PAR will also add the requirement for the originator to indicate that the comment was incorporated or how the comment was resolved. When the PAR is approved the procedures will be revised to incorporate the above action. The expected date to get these three procedures and any other impacted procedures revised is estimated to be May 30, 1997.

BLOCK 15 EXTENT OF CONDITION

The extent of condition is restricted to changing the three procedures. No further action is required. The QAR agrees that we are doing the action but do not have it incorporated into a procedure.

BLOCK 16 ROOT CAUSE DETERMINATION

The condition is isolated therefore no further Root Cause Determination is indicated.

BLOCK 17 ACTION TO PRECLUDE RECURRENCE

All actions to resolve this deficiency are included in BLOCK 14 REMEDIAL ACTIONS therefore there are no further actions required.

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

8 ☐ Performance Report
☒ Deficiency Report

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PR/DR CONTINUATION PAGE

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