



Department of Energy

Washington, DC 20585

QA: L

MAR 03 1997

L. D. Foust, Technical Project Officer
for Yucca Mountain Site
Characterization Project
TRW Environmental Safety Systems, Inc.
1180 Town Center Drive, M/S 423
Las Vegas, NV 89134

ISSUANCE OF CORRECTIVE ACTION REQUEST (CAR) YM-97-C-001 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT M&O-ARC-97-09 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT AND OPERATING CONTRACTOR (CRWMS M&O)

Enclosed is CAR YM-97-C-001 generated as a result of OQA Audit M&O-ARC-97-09.

Please provide a response to this deficiency that meets the applicable requirements of Administrative Procedure 16.2Q, Corrective Action and Stop Work. Send the original of your response to Deborah Sult, OQA/QATSS, P.O. Box 30307, Mail Stop 455, North Las Vegas, Nevada 89036-0307. Response to the CAR is due 20 working days from the date of this letter. Any extension to due date must be requested in writing, with appropriate justification, prior to the due date.

For clarification purposes with regards to your response to this CAR, it is OQA's position that "staff augmentation" is defined as supplemental staff performing activities that are within the CRWMS M&O scope of work while under day-to-day direct supervision of the CRWMS M&O management.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Lester W. Wagner at (702) 794-1304.

OQA:JB-1053

R.W. Clap
for Donald G. Horton, Director
Office of Quality Assurance

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102.7

Enclosure:
CAR YM-97-C-001

Recip: NMSS/aur



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PDR WASTE
WM-11 PDR

Printed with soy ink on recycled paper

MAR 03 1997

L. D. Foust

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cc w/encl:

L. H. Barrett, DOE/HQ (RW-1) FORS
T. A. Wood, DOE/HQ (RW-55) FORS
J. O. Thoma, 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
R. A. Morgan, M&O, Las Vegas, NV
R. W. Clark, DOE/OQA, Las Vegas, NV
W. E. Barnes, DOE/YMSCO, Las Vegas, NV
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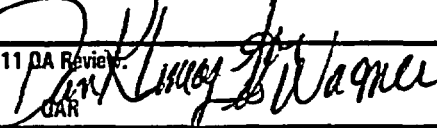

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV
L. W. Wagner, OQA/QATSS, Las Vegas, NV
D. G. Sult, OQA/QATSS, Las Vegas, NV

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

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CORRECTIVE ACTION REQUEST

1 Controlling Document: QARD		2 Related Report No.: M&O-ARC-97-09	
3 Responsible Organization: M&O		4 Discussed With: Bob Sandifer, Bob Morgan, Jack Bailey	
5 Requirement: QARD, Rev. 5, Section 2.2.3 B states in part "The QA Program shall apply to activities related to the items on a Q-List (such as...procurement...)." QARD, Rev. 5, Section 4.2.1 states in part "Procurement documents issued by each Affected Organization shall include the following provisions, as applicable to the item or service being procured: A. A statement of the scope of work to be performed by the supplier. B. Technical Requirements... C. Quality Assurance Program Requirements..."			
6 Description of Condition: Contrary to the above the following noncompliant conditions were noted: 1 - Procurement of Quality Affecting services from the below identified suppliers were carried out as Non-Q in violation of the QARD requirements identified in Block #5. In discussion with M&O personnel it was discovered that the reason for this was M&O identification of the procurement as "Staff Augmentation", which is not subject to section 7 of the QARD. However, staff augmentation is only for activities or functions within the current scope of work, capability and normally performed by the M&O. University Systems (UNLV, UNR, DRI) University Systems Subcontractors (Activation Labs, USML, McMaster University - these independent organizations did not have M&O procurement documents which control the work, available for review) Kiewit Argonne National Laboratory Pacific Northwest Laboratory* (Continued on page 3)			
7 Initiator:  Les Wagner		8. Does a stop work condition exist? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> ; If Yes, Attach copy of SWD If Yes, Check One: A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> <input type="checkbox"/> Date 2/20/97	
10. Recommended Actions: 1. Perform investigative actions resulting in documented identification of all related deficiencies. 2. Determine the impact on quality affecting activities performed under the procurement documents which were not controlled in accordance with QARD Sections 4 & 7 requirements. 3. Provide training/instruction to M&O line management/tasks managers that if they identify an area in the QARD in which a requirement is not clear or is not understood, they need to formally request clarification from the Director, OQA to eliminate the possibility of making the wrong interpretation.			
11 QA Review:  QAR		12 Response Due Date: 20 working days from issuance Date 2/24/97	
13 Affected Organization QA Manager Issuance Approval: Printed Name Donald G. Horton		Signature  Date 3/3/97	
22 Corrective Actions Verified QAR		23 Closure Approved by: AQQAM	

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CORRECTIVE ACTION REQUEST RESPONSE

14 Remedial Actions:

15 Extent of Condition and Impact:

16 Root Cause Determination prepared in accordance with AP-16.4Q is attached.

17 Action to Preclude Recurrence:

18 Corrective Action Completion Due Date:

19 Response by:

☐ Initial

☐ Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted

AQQAM

Date

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8 ☒ Corrective Action Request
☐ Stop Work Order

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CAR/SWO CONTINUATION PAGE

Block 6 - Description of Condition: (Continued from page 1)

*Note that in May 1996 LLNL sent documented notification to PNL withdrawing all subcontract responsibility including the LLNL Quality Assurance Requirements Specification (QARS). Since that time, the CRWMS M&O has not completed actions to close the gap with the initiation of a "Q" Procurement Document which provide quality assurance requirements for the services supplied by this Supplier.

2 - Review of the Non-Q procurement documents for personal services of Ronald L. Bruhn and Walter J. Arabasz, PH.D. state that these two individuals are to perform work in accordance with USGS' QA Program with any additional training necessary provided by the M&O. USGS training records for these individuals revealed that they had received training in "YMP-USGS Orientation for Expert Elicitation," "Elicitation Process Training," and "Expert Elicitation" - QMP 3.16, Rev. 0. However, the Activity Evaluation covering the work to be performed by these two individuals stated this activity is subject to the requirements of the QARD as implemented by the following M&O procedures QAP-1-0, QAP-2-0, QAP-2-1, QAP-2-2, QAP-3-1, QAP-3-5, QAP-6-1, QAP-17-1, AP-16.1Q, AP-16.2Q, NLP-3-15, NLP-3-18. No M&O training records were available to indicate the additional training as identified by the Activity Evaluation covering the task "Update Preliminary Seismic Hazard Analysis for Yucca Mountain," was completed.

Note also that USGS QMP-3.16, Rev. 0 is currently under comment resolution with DOE with major problems needing to be resolved prior to DOE acceptance of the procedure.