



Department of Energy

Washington, DC 20585

JAN 09 1997

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

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT  
(DR) YM-96-D-055 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA)  
AUDIT YM-ARC-96-11 OF LAWRENCE LIVERMORE NATIONAL LABORATORY

The OQA staff has verified the corrective action to DR YM-96-D-055 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either Mario R. Diaz at (702) 794-1489 or John E. Therien at (702) 794-5408.

Donald G. Horton, Director  
Office of Quality Assurance

OQA:MRD-0648

Enclosure:  
DR YM-96-D-055

- cc w/encl:
- T. A. Wood, DOE/HQ (RW-55) FORS
- J. O. Thoma, NRC, Washington, DC
- S. W. Zimmerman, NWPO, Carson City, NV
- B. R. Justice, M&O, Las Vegas, NV
- R. A. Morgan, M&O, Las Vegas, NV
- R. E. Monks, M&O/LLNL, Livermore, CA
- Records Processing Center = "8"

- cc w/o encl:
- W. L. Belke, NRC, Las Vegas, NV
- J. E. Therien, OQA/QATSS, Las Vegas, NV
- D. G. Sult, OQA/QATSS, Las Vegas, NV
- R. W. Clark, DOE/OQA, Las Vegas, NV

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RADIOACTIVE WASTE MANAGEMENT  
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8  Performance Report  
 Deficiency Report  
YM-96-D-055  
NO. 411QAD-96-0055  
DS 9/9/96  
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:  
033-YMP-QP 4.1, Revision 3, CN 4.3-3-1, CN 4.1-3-2

2 Related Report No.  
YM-ARC-96-11

3 Responsible Organization:  
Lawrence Livermore National Laboratory (LLNL)

4 Discussed With:  
R. Monks

5 Requirement/Measurement Criteria:  
Sections 4.1.5.4.1 and 4.1.5.4.3 requires that the QA Manager review QARD revisions vis-a-vis the Generic QA Requirements Specification and revise this specification, as appropriate. Additionally, based on revisions to the Generic QA Requirements Specification, Task Leaders are to review and revise, as appropriate, Subcontract QA Requirements Specifications.

6 Description of Condition:  
The Generic QA Requirements Specification has not been revised since 7/1/91, nor is there evidence that this Specification has been reviewed vis-a-vis the various QARD revisions issued since July 1991.

The Subcontract QA Requirements Specification for Argonne National Laboratory (ANL) and Pacific Northwest Laboratory (PNL) have not been revised since September 1992, although annual evaluations were performed in October and February of 1995, respectively.

7 Initiator  
John E. Therich *[Signature]* Date 4/30/96

9 QA Review  
QAR *[Signature]* Date 4/30/96

10 Response Due Date  
20 Working Days From Issuance

11 QA Issuance/Approval  
QAR (PRI/AOQAM/JOR) *[Signature]* Date 5/18/96

12 Remedial Actions:  
QARs have been canceled. Note: at the time of the audit, LLNL had no contracts with suppliers where the QARs are involved.

13 Remedial Action Response By:  
*[Signature]* Date 6-4-96

14 Remedial Action Due Date  
July 31, 1996. Date

15 Remedial Action Response Acceptance  
QAR Date

16 PR Verification/Closure  
QAR Date

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**DEFICIENCY REPORT**

**17 Recommended Actions:**

Determine if the QA requirements invoked on ANL and PNL work is consistent with present QARD requirements.  
Evaluate the methodology in QP 4.1 to determine if this process is consistent with LLNL current procurement needs.  
Examine the procurement interfaces associated with ANL, PNL, LLNL and the Civilian Radioactive Waste Management System Management and Operating Contractor.

**18 Investigative Actions:** A review of ANL and PNL QA Program Plans by the LLNL QA staff and LLNL technical representative during annual evaluations shows that appropriate QARD requirements were implemented by the contract laboratories.  
YMP-QP 4.1 was not consistent with current work practices and has been canceled.  
The M&O now contracts directly for ANL and PNL work. LLNL technical staff reviews, or may be required to review, work results and provide technical direction to ANL and PNL as part of LLNL's assigned responsibilities for the M&O. This information is provided to and through the M&O. LLNL may provide technical evaluation data in future ANL and PNL annual evaluations.

**19 Root Cause Determination:**

Procedures were not revised to reflect current work practices.

**20 Action to Preclude Recurrence:**

Cancellation of procedure will preclude its use.  
Procurement interfaces with ANL, PNL, LLNL, and TRW should be addressed in TRW procedure revision when it is published.

21 Response by: <i>[Signature]</i> Date 6-1-96	22 Corrective Action Completion Due Date: August 31, 1996
23 Response Accepted QAR <i>[Signature]</i> Date N/A	24 Response Accepted AOQAM <i>[Signature]</i> Date N/A
25 Amended Response Accepted QAR <i>[Signature]</i> Date 8/26/96	26 Amended Response Accepted AOQAM <i>[Signature]</i> Date 9.3.96
27 Corrective Actions Verified QAR <i>[Signature]</i> Date 12/23/96	28 Closure Approved by: AOQAM <i>[Signature]</i> Date 1/7/97

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Block 22. Corrective Action Completion Due Date  
Addition of date: August 31, 1996

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Item 20. Block to Preclude Recurrence:  
Amended to read:

Cancellation of procedure will preclude its use.

For future contracts between LLNL and subcontractors the subcontracting staff will function as augmented LLNL staff working to LLNL procedures or AP-7.4Q will be implemented to determine suppliers acceptability for performing proposed work.

For future contracts involving LLNL interface with a subcontractor (i.e. as with work with ANL or PNL) the M&O procedure for development of procurement requirements, QAP-7.3, Rev. 0, Section 5.3.3C, requires a review of the procurement document package by organizations or technical disciplines affected by the procurement. Implementation of this procedure will necessarily involve LLNL in the review of contracts and revisions to contracts where LLNL is affected. LLNL staff will provide appropriate input to the contract to assure that proper information is included during the required review. Likewise, implementation of AP-7.4Q will require LLNL input during the annual evaluation of these contractors' performance.

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VERIFICATION OF CORRECTIVE ACTION FOR DR YM-96-D-055

033-YMP-QP 4.1, Rev. 3, has been canceled, as well as the outdated subcontract QA Requirement Specifications for ANL and PNL. A review of the ANL and PNL QA Program Plans by LLNL QA and Technical Representatives during annual evaluations indicate overall compliance to QARD requirements. For any future contracts initiated by the M&O on behalf of LLNL, the procurement documents shall be subjected to the process delineated in QAP 7.3, which would require the appropriate QA and technical inputs and reviews from affected entities. Activities associated with QA Program elements 4 and 7 shall be observed on future audits.

  
\_\_\_\_\_  
John E. Therien, QAR

12/23/96  
Date