



Department of Energy
Washington, DC 20585

QA: L

FEB 12 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

EVALUATION OF REVISED RESPONSE TO DEFICIENCY REPORT (DR) YM-97-D-013
RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT K/PB-ARC-97-08
OF KIEWIT/PARSONS BRINCKERHOFF

The OQA staff has evaluated the revised response (dated February 4, 1997) to
DR YM-97-D-013. 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 the
date. Please send a copy of extension requests to Deborah Sult, OQA/QATSS, P.O. Box 98608,
Mail Stop 455, Las Vegas, Nevada 89193-8608.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or
Stephen D. Harris at (702) 794-5522.

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

OQA:JB-0932

Enclosure:
DR YM-97-D-013

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

cc w/o encl:
W. L. Belke, NRC, Las Vegas, NV
S. D. Harris, 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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Recip: NMSS/HLUR



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

ORIGINAL
THIS IS A RED STAMP
Performance Report
 Deficiency Report

NO. YM-97-D-013

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Yucca Mountain Site Characterization Project Administrative Procedure (YAP)-15.1Q	2 Related Report No. K/PB-ARC-97-06
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3 Responsible Organization: Kiewit/Parsons Brinckerhoff (K/PB)	4 Discussed With: Kevin Krank, Gayln Schumacher
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5 Requirement/Measurement Criteria:
 YAP-15.1Q, Revision 2, ICN 1, Section 5.4, requires revisions to a Non-Conformance Report (NCR) to include the NCR Continuation Page which describes what is being revised and a delta with the revision number placed adjacent to the revision and the delta and number placed adjacent to the NCR number on all previous pages.

6 Description of Condition:
 Contrary to the above requirements, 4 of 4 NCRs audited failed to meet the requirements:

K/PB-96-0002 and K/PB-96-0006 had no NCR Continuation Page used and the delta and revision number were not on previous pages.

K/PB-96-0023 - the delta was not explained, no use of NCR Continuation Page, delta and number not indicated on previous pages.

K/PB-96-0025 - no NCR Continuation Page used.

7 Initiator <i>Stephen D. Harris</i> Stephen D. Harris Date 11/22/96	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Action: (Not required for PR)
 Evaluate all K/PB and Yucca Mountain Site Characterization Office NCRs within the time frame of effectivity of the procedure requirements and resolve all non compliances.

11 QA Review: QAR <i>Stephen Harris</i> Date 11/26/96	12 Response Due Date 20 working days from issuance
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13 Affected Organization QA manager Issuance Approval: (QAR for PR) Printed Name <u>DONALD E. HORTON</u> Signature <i>[Signature]</i> Date <u>12/4/96</u>	
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22 Corrective Action Verified QAR Date	23 Closure Approved by: (N/A for PR) AOQAM Date
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WASHINGTON, D.C.**

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

Based upon investigative actions, no remedial actions are required.

15 Extent of Condition: (Not required for PR)

Kiewit/PB interpreted the use of NCR Continuation pages for NCR revision as an option where needed. Kiewit/PB, therefore, did not comply with this requirement prior to discovery during this DOE audit. Review of the NCRs delineated on this DR provided the following results and conclusions:

K/PB 96-0002, -0006 and -0025 were invalidated and closed. Revisions are sufficiently clear and do not need to be retrofitted.

K/PB 96-0023 was already closed, was for non-Q material and the revision was sufficiently clear. No retrofit required.

Review of closed NCRs reveals that revisions are sufficiently clear and retrofitting of these NCRs to add continuation pages is not warranted. Only two open NCRs have been revised, one correctly according to procedure and one in which the corrections are clear and need not be corrected. All future revisions will be performed in accordance with YAP-15.10.

16 Root Cause Determination: (Not required for PR)

Required Yes No

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

Required Yes No

The Kiewit/PB Quality Control Manager has issued Interoffice Memo #QC97-0036 (copy attached) advising the Kiewit/PB Coordinator Supervisor and NCR Coordinator of the requirement with instructions to ensure no NCRs are revised except in accordance with YAP-15.1Q, part 5.4.

18 Corrective Action Completion Due Date:

01/02/97

19 Response by: H. R. COX

Initial

Amended

Date 1/7/97

Phone 5-5652

20 Response Accepted

QAR

N/A

Date

21 Response Accepted (N/A for PR):

AQQAMM

N/A

Date



**KIEWIT/PB
YUCCA MOUNTAIN PROJECT**

INTEROFFICE MEMO

QA: N/A
QC: MEM: 97-036

To: K. Krank/G. Schumacher
From: H. R. Cox *H. R. Cox*
Date: January 2, 1997
SUBJECT: Revisions to Nonconformance reports (NCRs).

YAP-15.1 Q, part 5.4 requires that *a continuation sheet be added* to any NCR being revised and that revision deltas be added to each page of the original NCR. The NCR Coordinator (Schumacher) needs to be sure that all K/PB revised NCRs issued after this date comply with these requirements. The Coordinator Supervisor (Krank) needs to ensure that any future NCR Coordinators are aware of this requirement. Be sure to re-read this section of YAP 15.1 Q to assure that all requirements for NCR revision are complied with.

cy: QC Files
Central Files

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

Based upon investigative actions, no remedial actions are required.

15 Extent of Condition: (Not required for PR)

See continuation page for revised response.

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: R. E. ARMSTRONG

Initial

Amended

Date 02/04/97

Phone 4-7344

20 Response Accepted

OAR

S. D. Harris

Date

2/6/97

21 Response Accepted (N/A for PR):

ADDAMM

R. W. Clark

Date

2/11/97

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PR/DR CONTINUATION PAGE

K/PB CLARIFICATION TO INITIAL RESPONSE SUBMITTED 1/7/97

BLOCK 15 - CONTINUED

A) K/PB NCRs 96-0002, -0006 and -0025 were invalidated during the normal NCR processing activity, not as a result of the DR.

B) Per agreement with the M&O, since October 1, 1996 all nonconforming conditions identified by K/PB are processed as LVMO NCRs. K/PB is allowed to disposition only those NCRs for which the nonconforming conditions are determined to be rework or reject/scrap. Although K/PB identifies nonconforming conditions and originates the NCRs, the M&O QA group processes the NCRs for all other types of dispositions. In terms of revisions to the NCRs the final result is that K/PB only revises those NCRs that are dispositioned as rework or reject/scrap. Prior to October 1, 1996, K/PB originated K/PB NCRs for identified nonconforming conditions and transferred the nonconforming condition to YMSCO NCRs when the disposition was determined to be other than rework or reject/scrap. As specified in our original response, K/PB QC reviewed all closed and open NCRs under our control. For the closed NCRs the revisions were determined to be sufficiently clear not to warrant encumbering the system by revising a closed record simply to place the revision on another form. Of the open NCRs under K/PB control, including LVMO and K/PB, only two had been revised and both were K/PB NCRs. One of the NCRs had been revised correctly in accordance with YAP-15.1Q and since the other revision had already been processed and was sufficiently clear, it was determined that no improvement could be made by reprocessing the same revision.

BLOCK 17 - CONTINUED

As stated in our original response, personnel responsible for revising NCRs under K/PB processing control have been informed by memorandum to comply with the requirement for revising NCRs as specified in YAP-15.1Q.