



Department of Energy

Washington, DC 20585

APR 03 1997

QA: L

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

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT
(DR) YM-96-D-061 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA)
SURVEILLANCE M&O-SR-96-011

The OQA staff has verified the corrective action to DR YM-96-D-061 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or
Patout H. Cotter at (702) 794-1332.

Donald G. Horton, Director
Office of Quality Assurance

OQA:JB-1279

Enclosure:
DR YM-96-D-061

cc w/encl:

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☐ Performance Report

☒ Deficiency Report

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

QARD, DOE/RW-0333P, Revision 5

2 Related Report No.

YMP-SR-96-011

3 Responsible Organization:

CRWMS M&O Design

4 Discussed With

O. J. Gilstrap / A. Segrest / J. Willis / J. Bailey / W. Glasser

5 Requirement/Measurement Criteria:

1.
 - QARD, Section 2.0, "Quality Assurance Program," Paragraph 2.2.1, "Quality Assurance Program Documents."
 - "B. Affected Organizations shall establish implementing documents applicable to their scope of work that translate Quality Assurance Requirements and Description (QARD) requirements into work processes."
 - QARD Section 3.0, "Design Control," Paragraph 3.2.8, "Design Change Control," states:
"Design changes shall be controlled according to the following requirements:
A. Changes to final designs, field changes, and nonconforming items dispositioned "use-as-is" or "repair" shall be justified and shall be subject to design control measures commensurate with those applied to the original design.
B. Design control measures for changes shall include provisions to assess the effect of the changes on the overall previously verified design and ensure that the design analyses for the item are still valid."

6 Description of Condition:

1. Contrary to the requirements in paragraph 2.2.1 and 3.2.8, the Design Control measures for NCRs dispositioned "use-as-is" (those not covered by an ECR) or "repair" resulting in changes to design requirements are presently not described and documented in CRWMS M&O implementing procedures.
2. Contrary to the requirements in paragraph 2.2.1, the CRWMS M&O matrix does not correctly identify where the QARD requirements are directly addressed for the following procedures:

NLP-3.25, "Configuration/Change Control," NLP-3.10, "Preparation of Changes to Engineering Drawings and Specifications," QAP-3-8, Specifications," QAP-3-9, "Design Analysis," and QAP-3-10, "Engineering Drawings."

7 Initiator

Patout H. Cotter

Date 5/17/96

9 QA Review

QAR

Date 5/17/96

10 Response Due Date:

20 Working Days From Issuance

11 QA Issuance Approval

QAR (PR)/AOQAM (DR)

Date 5/29/96

12 Remedial Actions:

Revise CRWMS M&O procedure(s) as necessary to comply with QARD requirements.

SEE DETAILED RESPONSE ON P. 4

13 Remedial Actions Response By

ALDEN M. SEGREST

Date 6/27/96

14 Remedial Action Due Date

SEP. 30, 1996

Date

15 Remedial Action Response Acceptance

QAR

Date 7/3/96

16 PR Verification /Closure

QAR

N/A

Date

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17 Recommended Actions:

1. Initiate action to update procedures.
2. Determine the root cause of deficient condition.
3. Determine and implement actions to preclude recurrence.

18 Investigative Actions:

SEE ATTACHED P. 4 FOR RESPONSE

19 Root Cause Determination:

SEE PAGE 4

20 Action to Preclude Recurrence:

SEE PAGE 4

21 Response By:

ALDEN M. SEQUEST

Date 06/27/96

22 Corrective Action Completion Due Date

SEP. 30, 1996

23 Response Accepted

QAR

Date 7/3/96

24 Response Accepted

AOQAM

Date 7/19/96

25 Amended Response Accepted

QAR

N/A

Date

26 Amended Response Accepted

AOQAM

N/A

Date

27 Corrective Action Verified

QAR

Date 3/17/97

28 Closure Approved by:

AOQAM

Date 4/1/97

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Block 5, Requirement/Measurement Criteria, continued:

2. QARD, Section 2.0, "Quality Assurance Program," Paragraph 2.2.1, "Quality Assurance Program Document," states:
- "2.2.1C Each Affected Organization shall complete a QARD requirements matrix for the portion of the QARD which they are implementing.
- 2.2.1C.1 The matrix shall identify: a) Where the QARD requirements are directly addressed."

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PR/DR CONTINUATION PAGE

12 Remedial Actions

The remedial actions will be:

1. Write a DAR to change YAP-15.1Q procedure, if required. MGDS Development cannot take responsibility for the actual revision of the procedure.
2. Write a PAR to change NLP-3-10, Preparation of changes to Engineering Drawings and Specifications, to provide additional clarification regarding "use-as-is" or "Repair".
3. Revise NLP-3-10 and Matrix as required.
4. Complete the above remedial actions by September 30, 1996.

BLOCK 18 Investigative Actions:

The M&O has updated the traces (on 4/23/96) for YAP 15.1Q in the QARD Trace matrix. This update was not and could not be entered in the RTN since DOE owns the document. We now trace the YAP to 3.2.8.A. but not 3.2.8.B. For 3.2.8.A, we also trace to NLP-3-8, 3-9, 3-10, 3-13, and 3-25, VLP-3-4, and QAPs 3-8, 3-9, 3-10. For 3.2.8.B we trace to NLP-2-0, 3-10, 3-25, VLP-3-4 and QAPs-3-8, 3-9, 3-10. These traces are adequate.

The traces have all been reviewed and determined to be adequate by a QAR within the M&O. The QARD Trace Matrix (The M&O replacement for RTN) and the RTN traces are the same.

There are two categories of "Use-as-is" and "repair" NCRs.

- A) Those that are "one time exceptions" not requiring a change to a drawing or a specification, and,
- B) Those that require a change to a drawing or specification (usually a change made by an ECR (NLP-3-25) or a drawing (QAP-3-10) or specification (QAP-3-8) revision)

For A above, procedure YAP-3.3Q titled "Preparation and Submittal of As- Built Drawings and Specifications" Attachment 9.3 last para. specifically states "Features documented in nonconformance reports and dispositioned "use-as-is" or "repair" shall also be incorporated into the as-built drawings and specifications." As-built drawings, which is another revision that is intended to be the last, and specifications will be revised using existing procedures QAP-3-8 and QAP-3-10, therefore ensuring that Changes to final designs, field changes, and nonconforming items dispositioned "use-as-is" or "repair" shall be justified and shall be subject to design control measures commensurate with those applied to the original design.

For B above, when ECRs are incorporated or a drawing or specification is revised drawings and specifications will be revised using existing procedures QAP-3-8 and QAP-3-10, therefore ensuring that changes to final designs, field changes, and nonconforming items dispositioned "use-as-is" or "repair" shall be justified and shall be subject to design control measures commensurate with those applied to the original design.

BLOCK 19 Root Cause Determination

The implementing procedures do not provide clear adequate instruction on how to Process NCRs that have dispositions of "use-as-is" or "repair".

BLOCK 20 Action to Preclude Recurrence:

The Actions to preclude Recurrence are covered in BLOCK 12 Remedial Actions.

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VERIFICATION STATEMENT FOR DR YMQAD-96-D-061

The following documents were reviewed to verify that 1) controls for NCR's dispositioned "use-as-is or repair" are specified and 2) the QARD requirements matrix correctly identifies where the requirements are addressed in M&O implementing procedures as specified in the response dated 6/27/96:

Procedure Action Request, PAR-96079 (request to change NLP-3-10)
NLP-3-10, Rev. 8, "Preparation of Changes to Engineering Drawings and Specifications"
Document Action Request, DAR No. 1858 (request to change YAP-15.1Q)
YAP-15.1Q, Rev. No. 3, ICN 0, Approved 2/21/97, "Control of Nonconformances"
QARD DOE/RW-0333P, Rev. 6, dated 3/3/97, "M&O Requirements Matrix"

The results of this review was satisfactory. This DR is now considered closed based on this review.


P. H. Cotter, QAR

3/12/97
Date