



Department of Energy
Washington, DC 20585

QA: L

FEB 1 1 1997

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Characterization Project
TRW Environmental Safety Systems, Inc.
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Las Vegas, NV 89134

EVALUATION OF RESPONSE TO DEFICIENCY REPORT (DR) YM-97-D-019
RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT LANL-ARP-97-01
OF LOS ALAMOS NATIONAL LABORATORY

The OQA staff has evaluated the response to DR YM-97-D-019. 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 Donald J. Harris at (702) 794-1467.

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

OQA:JB-0915

Enclosure:
DR YM-97-D-019

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

ORIGINAL
THIS IS A Performance Report
Deficiency Report
NO. YM-97-D-019
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document

QARD DOE/RW 0333P, Revision 5

LANL-YMP-QP-08.1, Revision 5, Identification and Control of Samples

2 Related Report No.

LANL-ARP-97-01

3 Responsible Organization:

LANL

4 Discussed With:

S. Levy, C. Martinez, D. Bish

5 Requirement/Measurement Criteria:

- 1) QARD Supp II Sample Control, Section II.2.2 Traceability, Item B. Sample traceability shall ensure that samples can be traced at all times from its collection through final use.
- 2) QP-08.1, Section 6.2.1, states in part; YMP personnel ensure sample identification and control is adequately documented to permit tracking a sample and its derivatives from its origination through all analytical or other process, to its present location or final disposition.
- 3) QARD Section II.2.4C.3, states in part; if sample storage is required, these methods shall provide for, as applicable: 3. updating related documents.

6 Description of Condition:

1. Contrary to the Requirements 1 and 2, LANL-YMP-QP-08-1 titled, "Identification and Control of Samples," nor any other LANL procedure address the identification of Standards when submitted as blind samples for analyses. These Standards are not tracked in the main menu Sample Tracking System or the Sample Tracking Log Notebook, e.g., the Laboratory Notebook TWS-EES-1-5-92-3 Calcite Precipitation Studies, WBS 1.2.3.2.1.1.1, identified on page 121, Standard (NBS & SGR) rock powders which was submitted as Blinds along with the unknown powders for INAA data to the University of Washington at St. Louis, Missouri, for analysis. These Standards NBS-278, NBS-688 and SGR-1 were assigned LANL Sample Numbers 1550, P1, 1552, P1, and 1551, P1 which appear as derivative of actual physical Powder Samples from the field that are tracked in the main menu Sample Tracking System and the Sample Tracking Log Notebook.
- 2) Contrary to Requirement 3, the LANL YMP Sample Storage Area was consolidated into the LANL Environmental Earth Science (EES) storage area. In addition, the number of cabinets were also consolidated. The main menu Sample Tracking System (computer program) and the Field Sample Log Book were not updated to reflect the new location of the YMP samples.

7 Initiator

D. J. Harris *Donald J. Harris* Date 12/12/96

9 Is condition an isolated occurrence?

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

10 Recommended Action: (Not required for PR)

1. Address the methodology of Controlling Standards (NBS/SGR) submitted as blinds along with field samples for analysis.
2. Update the Main Menu Sample tracking system and Sample Tracking Log Notebook with the current actual location of the YMP samples.

11 QA Review:

QAR *Donald J. Harris* Date 12-17-96

12 Response Due Date

20 working days from issuance

13 Affected Organization QA Manager Issuance Approval: (QAR for PR)

Printed Name Donald G. Horton

Signature *James Blaylock*

Date 12/24/96

22 Corrective Action Verified

QAR

Date

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

AQAM

Date

H27 NA 25 4/3/97

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

PR/DR NO. YH-97-D-019

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

See ATTACHED

15 Extent of Condition: (Not required for PR)

See ATTACHED

16 Root Cause Determination: (Not required for PR)

Required ☐ Yes ☐ No

N/A

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

Required ☐ Yes ☐ No

See ATTACHED

18 Corrective Action Completion Due Date:

7/30/97

19 Response by:

☒ Initial
☐ Amended

S. Levy

Date 1/27/97 Phone

505/667-9504

20 Response Accepted

QAR

Donald J. Harris Date 1/27/97

21 Response Accepted (N/A for PR):

AOQAM

R.W. Clark Date 2/10/97

Exhibit AP-16.1Q.2

Rev. 07/15/96

1/27/97

EES-13-01-97-1414

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Response to DR YM-97-D-019

14 Remedial Actions:

Condition 1: A memorandum will be added to the record package or packages pertaining to the procurement of INAA analytical services from Washington University at St. Louis, Missouri. The memorandum will explicitly state that standards NBS-287, NBS-688, and SGR-1 were labeled as LANL 1550,P1, 1552,P1, and 1551,P1 but had not been assigned these numbers in the sample tracking system. The memo will also state that any data associated with these LANL numbers contained in the record package of correspondence between the vendor and the LANL investigator refer to the identified standards and not to the site characterization samples with the assigned numbers LANL 1550, 1552, and 1551. With the completion of this action, all project records containing references to the standards under "dummy" LANL numbers will also contain statements detailing the true identities of the standards.

Condition 2: Samples stored in the LANL YMP sample storage area and in LANL YMP investigators offices and laboratories will be inventoried and the current cabinet locations of the samples will be recorded in the sample storage log book, which is the scientific notebook required by QP-08.1, sections 6.1.4 and 6.2.1. The electronic sample tracking system is a supplemental sample tracking system not required by QP-08.1; it will be updated as time permits. The inventory will be performed in a phased manner as time permits. First priority will be given to samples in use for ongoing studies; lowest priority will be for archived samples from completed or suspended activities.

15 Extent of Condition:

Condition 1: The PI has identified five purchase requests (PR# X1556, PR# Z8437, PR# Z8620, PR# 0286L, and PR# 8670U) within this study plan, including the example noted in the deficiency report, in which standards were identified by "dummy" LANL numbers in correspondence with a vendor.

Condition 2: As used in the DR, "LANL YMP Sample Storage Area" refers only to the storage area used by mineralogy-petrology researchers. The disposal of samples and return of samples to the Sample Management Facility were both documented in the sample storage logbook, which is the official record of sample disposition. The contents of some cabinets were retained intact when the cabinets were moved to the new storage area, and the logbook entries for the samples in these cabinets do not require updating. The exact extent of updates required for other cabinets can best be determined during the inventory that is proposed as a remedial action.

16 Root Cause Determination: N/A

17 Action to Preclude Recurrence:

Condition 1: The procedures will be revised to state that standards submitted as blinds must be entered into the sample storage logbook and, if they are to be submitted with a LANL number, must also be entered into the electronic sample tracking system. At present, the control of standards submitted as blinds along with site samples for analysis is not specifically addressed in LANL-QP-08.1 or LANL-EES-DP-101.

Condition 2: An increased effort will be made to keep the sample storage logbook up to date through awareness of the identified condition. The consolidation of the sample storage area was necessitated by a reduction in funding. The reduced funding also meant fewer personnel with less time available facing an increased burden of compliance. Researchers have been trained to the appropriate procedures and are aware of the requirements for sample traceability, but are forced to prioritize the use of their time. As a result, the logbook was not updated as required for some samples.

Corrective action completion: 07/30/97.