



Department of Energy

Washington, DC 20585

DEC 24 1996

Liz Danko
Transnuclear, Inc.
Four Skyline Drive
Hawthorne, NY 10532-2176

ISSUANCE OF DEFICIENCY REPORTS (DR) YM-97-D-009 THROUGH YM-97-D-011, YM-97-D-021 AND YM-97-D-022 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) SUPPLIER AUDIT OQA-SA-97-003 OF TRANSNUCLEAR, INC.

Enclosed are DRs YM-97-D-009 through YM-97-D-011, YM-97-D-021 and YM-97-D-022 generated as a result of OQA Supplier Audit OQA-SA-97-003.

Please provide a response to these deficiencies that meets the applicable requirements of Administrative Procedure 16.1Q, Performance/Deficiency Reporting. Send the originals of your responses to Deborah Sult, OQA/QATSS, P.O. Box 98608, Mail Stop 455, Las Vegas, Nevada 89193-8608. Responses to the DRs are due 20 working days from issuance. Extensions to due dates must be requested in writing, with appropriate justification, prior to the due dates.

If you have any questions, please contact either Mario R. Diaz at (702) 794-1489 or Dennis C. Threatt at (702) 794-1400.

James Blaylock Jr.
Donald G. Horton, Director
Office of Quality Assurance

OQA:MRD-0602

Enclosure:
DRs YM-97-D-009 through
YM-97-D-011, YM-97-D-021
and YM-97-D-022

cc w/encl:
T. A. Wood, DOE/HQ (RW-55) FORS
J. O. Thoma, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
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OFFICE OF CIVILIAN
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8 ☐ Performance Report
☒ Deficiency Report

NO. YM-97-D-009

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QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:
10CFR72, Subpart G; Transnuclear QA Program Plan, E-13045, Rev. 0

2 Related Report No.
OQA-SA-97-003

3 Responsible Organization:
Transnuclear

4 Discussed With:
Alan Hanson, Elizabeth Danko

5 Requirement/Measurement Criteria:
10CFR72, Subpart G, Section 72.172, Corrective Action, requires that measures be established to ensure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances, are promptly identified and corrected.

The Transnuclear QA Program Plan, Dry Transfer System Design for Spent Fuel, E-13045, requires that nonconformances, inspection reports, and test reports be evaluated for the need for corrective action.

6 Description of Condition:

Contrary to the above requirements, Transnuclear QA Procedure 16.1, Rev. 0, paragraph 4.1.1 requires that only nonconformance reports, operating reports, and design deviations be reviewed for the need for corrective action.

7 Initiator

Dennis Threatt

Date 11/22/96

9 Is condition an isolated occurrence?

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

10 Recommended Actions: (Not required for PR)

Revise QA Procedure 16.1 to address the need for corrective action for all deficiencies including audit findings. In addition, all deficiencies must be reviewed to determine if a significant condition adverse to quality exists.

11 QA Review

QAR

Date 12/5/96

12 Response Due Date

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

Printed Name Donald G. Horton

Signature

James Blaylock Jr

Date 12/20/96

22 Corrective Actions Verified

QAR

Date

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

AOQAM

Date

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PR/OP NO. YM-97-D-009
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QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

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:

19 Response by:

☐ Initial

☐ Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

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THIS IS A **DEFICIENCY** REPORT
☒ Performance Report
☒ Deficiency Report
NO. YM-97-D-010
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QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:
Transnuclear QA Procedure 15.2, Control of Nonconforming Items, Rev. 4

2 Related Report No.
OQA-SA-97-003

3 Responsible Organization:
Transnuclear

4 Discussed With:
Alan Hanson, Elizabeth Danko

5 Requirement/Measurement Criteria:
Transnuclear QA Procedure 15.2, Paragraph 4.3 states in part, "Dispositions shall be determined by TN personnel qualified in accordance with QA Procedure 2.1 and who have access to pertinent background information."

6 Description of Condition:
Contrary to the above requirement, there was no objective evidence that anyone providing dispositions to Nonconformance Reports had been qualified in accordance with QA Procedure 2.1, Qualification of Inspection and Test Personnel.

7 Initiator
Dennis Threath *Dennis Threath* Date 11/22/96

9 Is condition an isolated occurrence?
☐ Yes ☐ No ☒ Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)
Revise QA Procedure 15.2, Control of Nonconforming Items, to clarify since there appears to be no requirement that persons providing dispositions to Nonconformance Reports be qualified as inspection and test personnel.

11 QA Review
QAR *Dennis Threath* Date 12/5/96

12 Response Due Date

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

Printed Name Donald G. Horton

Signature *James Blumhert*

Date 12/20/96

22 Corrective Actions Verified

QAR

Date

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

AOQAM

Date

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PAGE 2 OF 2
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required

☐ Yes

☐ No

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

Required

☐ Yes

☐ No

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8 ☐ Performance Report
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NO. YM-97-D-011

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QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:
10CFR72, Subpart G; Transnuclear QA Procedure 18.3, QA Audits, Rev. 5

2 Related Report No.
OQA-SA-97-003

3 Responsible Organization:
Transnuclear

4 Discussed With:
Alan Hanson, Elizabeth Danko

5 Requirement/Measurement Criteria:
10CFR72, Subpart G, Section 72.176, Audits, states in part, "The audits must be performed in accordance with written procedures or checklists by appropriately trained personnel not having direct responsibilities in the areas being audited."

Transnuclear QA Procedure 18.3, Paragraph 4.2, states in part, "In all cases, the auditor shall not have any direct responsibility for the performance of the activities which are to be audited..."

6 Description of Condition:
Contrary to the above requirements, the Lead Auditor who conducted Internal Audit 95-02 audited the areas of Design Control, Document Control, and Records for which, as Project QA Engineer for Project 1051, the Lead Auditor had direct responsibilities.

7 Initiator
Dennis Threatt *Dennis Threatt* Date 11/22/96

9 Is condition an isolated occurrence?
☐ Yes ☒ No ☐ Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)
Provide another trained Lead Auditor to reaudit all areas where a lack of auditor independence existed.
Evaluate the impact on objectivity for the internal audits conducted.

11 QA Review
QAR *Dennis Threatt* Date 12/5/96

12 Response Due Date

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

Printed Name Donald G. Horton

Signature *James Blaylock Jr*

Date 12/20/96

22 Corrective Actions Verified

QAR

Date

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

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PR/DR NO. YM-97-D-011
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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required

☐ Yes

☐ No

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

Required

☐ Yes

☐ No

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NO. YM-97-D-021

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

10CFR72, Subpart G, Transnuclear QA Procedure 7.1 Procurement Source Evaluation

2 Related Report No.

OQA-SA-97-003

3 Responsible Organization:

Transnuclear, Inc.

4 Discussed With:

Alan Hanson, Elizabeth Danko

5 Requirement/Measurement Criteria:

10CFR72, Subpart G, Section 72.154, states in part, "The licensee shall establish measures to ensure that purchased material, equipment, and services,conform to purchase documents. These measures must include provisions for source evaluation and selection...."

Transnuclear QA Procedure 7.1, Paragraph 3.0, requirements state in part, "Transnuclear shall perform a source evaluation to determine whether a prospective vendor has the capability to supply safety related items or services..."

6 Description of Condition:

Contrary to the above requirements, there was no objective evidence a source evaluation was performed for NES Corporation which conducted the annual evaluation of the Transnuclear, Inc. QA Program.

7 Initiator

Gary Wood

Date 11/22/96

9 Is condition an isolated occurrence?

☐ Yes

☒ No

☐ Unknown; Must be Yes if PR

10 Recommended Action: (Not required for PR)

Fully implement the procedure as written for all future procurements or revise the procedure to reflect actual work practices.

11 QA Review

QAR

Date 12/18/96

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 B. [Signature]

Date 12/20/96

22 Corrective Action Verified

QAR

Date

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

AOQAM

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PR/DR NO. _____

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

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:

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8 ☐ Performance Report
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:
 10CFR72, Subpart G, Transnuclear QA Procedure 2.1, Rev. 2

2 Related Report No.
 OQA-SA-97-003

3 Responsible Organization:
 Transnuclear, Inc.

4 Discussed With:
 Alan Hanson, Elizabeth Danko

5 Requirement/Measurement Criteria:

10CFR72, Subpart G, Section 72.144, Quality Assurance Program, states in part, "The licensee shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to ensure that suitable proficiency is achieved and maintained."

Transnuclear QA Procedure 2.1, Paragraph 3.2, states in part, "Within Transnuclear, the activities which require the use of qualified personnel for test and inspection of safety-related items are: Receipt inspection, Source inspection, ----."

Transnuclear QA Procedure 2.1, Paragraph 4.2, states in part, "Evidence of personnel qualifications shall be documented on a Qualification and Certification Record."

6 Description of Condition:

Contrary to the above requirements, a Qualification and Certification Record for individuals performing source and receipt inspections at Transnuclear's cask supplier were not available for review by the audit team

7 Initiator

Gary Wood

Date 11/22/96

9 Is condition an isolated occurrence?

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

10 Recommended Actions: (Not required for PR)

Identify the individuals performing inspections, evaluate the qualifications of the personnel performing source and receiving inspections, conduct any required indoctrination and training, and certify inspection personnel in accordance with the procedure. Verify that completed inspections were properly conducted, complete, and satisfactory.

11 QA Review

QAR

Date 12/18/96

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

Date 12/20/96

22 Corrective Actions Verified

QAR

Date

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PR/DR NO. YM-97-D-022
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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR) Required ☐ Yes ☐ No

17 Action to Preclude Recurrence: (Not required for PR) Required ☐ Yes ☐ No

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