



Department of Energy  
Washington, DC 20585

QA: L

MAR 11 1997

W. E. Barnes, Project Manager  
ATTN: J. R. Compton  
U.S. Department of Energy  
Yucca Mountain Site Characterization  
Office, M/S 523  
P.O. Box 30307  
North Las Vegas, NV 89036-0307

EVALUATION OF RESPONSE TO DEFICIENCY REPORT (DR) YM-96-D-095  
RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT HQ-ARC-96-03

The OQA staff has evaluated the response to DR YM-96-D-095. The response has been determined to be unsatisfactory. Item number 1d of the Remedial Action response does not address the need for the letter from the U.S. Department of Energy (DOE) Human Resources to identify the basis for qualification (i.e., the education and/or experience that was verified). This is necessary for two reasons: (1) to establish traceability to the appropriate Human Resources' documentation, and (2) in order to ensure the verified qualifications are still adequate when positions change or to identify the need for additional verification. Revision of the letter should include identification of the basis for qualification and delete the reference to DOE Order 3731.1 which does not pertain to verification for qualification. Item number 7 in the Remedial Action response should identify the fact that traceability to DOE Human Resources documentation is provided via the letter maintained in the training/qualification file.

Item number 1d of the Remedial Action response does not address procedural references to verification of education/experience in accordance with DOE standard practices for federal employees (i.e., the Federal Qualification Standards Handbook). The response indicates that no investigative action is required (see Block 15). Item number 3 indicates investigative action is being performed. This should be identified in Block 15. The response also indicates no root cause determination or action to preclude recurrence. Item number 4 states that the procedure is being replaced. Root cause should be determined to ensure the procedure includes the appropriate criteria and the procedure change should be addressed as action to preclude recurrence. Since the current procedure, YMP Line Procedure 2.1Q, does not make this reference, the reference needs to be included during development of the Administrative Procedure identified in Item number 4 of the Remedial Action response.

All other items in the response to DR YM-96-D-095 were evaluated and determined to be acceptable.

An amended response is required to be submitted to this office within ten working days of the date of this letter. Send the original of your response to Deborah Sult, OQA/QATSS, P.O. Box 30307, Mail Stop 455, North Las Vegas, Nevada 89036-0307. If an extension to the due date is necessary, it must be requested in writing, with appropriate justification, prior to that date.

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MAR 11 1997

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Dennis C. Threath at (702) 794-1400.

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

OQA:JB-1065

Enclosure:  
DR YM-96-D-095

cc w/encl:

J. O. Thoma, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
P. A. Pytel, M&O, Las Vegas, NV  
Records Processing Center = "

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV  
D. C. Threath, OQA/QATSS, Las Vegas, NV  
D. G. Sult, OQA/QATSS, Las Vegas, NV  
R. W. Clark, DOE/OQA, Las Vegas, NV

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

8  Performance Report  
 Deficiency Report  
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:  
YMSCO Procedure YLP-2.1Q, Rev. 1, ICN 2 & QARD, Rev. 5

2 Related Report No.  
HQ-ARC-96-003

3 Responsible Organization:  
YUCCA Mountain Site Characterization Office (YMSCO)  
- AMA

4 Discussed With:  
Dick Spence/Sandra L. Rouse

5 Requirement/Measurement Criteria:  
QARD Section 2.2.12B, D and F  
"...Establish description for those positions that include work subject to the QARD."  
"...Establish minimum education and experience requirements for each position."  
"...Ensure minimum education and experience are verified or, when minimum education and experience cannot be specifically verified, provide a statement of justification for the personnel assignment."  
(CONTINUED ON PAGE 3)

6 Description of Condition:  
Contrary to the requirements in block 5 above:  
1) Personnel Qualification Records Packages of those Federal Employees referenced on Attachment 1 do not contain one or more of the following:  
a. Position Qualification Statement (PQS)  
b. Definition of Education Requirements  
c. Definition of Experience Requirements  
d. Adequate documentation of verification of education and experience\*  
e. Justification Statement for Education or Experience which could not be verified (as applicable).  
\*Note: Letters documenting that verification had been performed reference DOE Order 3731.1, which does not describe a process of verification of education and experience.  
2) YLP-2.1Q does not describe (or refer to) a process for verification of minimum education and experience.

7 Initiator *Charles E. Betts*  
Charles E. Betts Date 09/11/96

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

10 Recommended Actions: (Not required for PR)  
1) Ensure that each open Personnel Qualifications Records Package for Federal OCRWM YMSCO Personnel contain the following information:  
a. Position Qualification Statement (PQS)  
b. Definition of Education Requirements  
c. Definition of Experience Requirements  
d. Adequate documentation of verification of education and experience.  
e. Justification Statement for Education or Experience which could not be verified (as applicable) (CONTINUED ON PAGE 3)

11 QA Review  
QAR *Donald G. Horton* Date 9/18/96

12 Response Due Date  
10/31/96

13 Affected Organization QA Manager Issuance Approval: (QAR for PR)  
Printed Name Donald G. Horton Signature *D.G. Horton* Date 9/18/96

22 Corrective Actions Verified  
QAR Date

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

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:  
See attached.

15 Extent of Condition: (Not required for PR)  
No further investigative actions are required. See Block 14 above. All required documentation except one PQS for Richard Craun are available for inspection in DOE Human Resource documents.

16 Root Cause Determination: (Not required for PR) Required  Yes  No  
None required.

17 Action to Preclude Recurrence: (Not required for PR) Required  Yes  No  
None required. All required documentation except the one PQS for Richard Craun is available for inspection in DOE Human Resource documents.

18 Corrective Action Completion Due Date:

01/31/96

19 Response by:

Initial

Amended

Date 12/03/96

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

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RADIOACTIVE WASTE MANAGEMENT  
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5 REQUIREMENT (CON'T)

QARD Section 17.2.1.A.7

"Documents that meet the following requirements shall be classified as lifetime QA records...Personnel training and qualification documents for individuals executing QA program requirements."

QARD Section 5.2 and 5.2.2.C

"Work shall be performed in accordance with controlled implementing documents...implementing documents shall include...a sequential description of the work to be performed..."

YLP-2.1Q Section 7.1

"Each of the following shall be designated as a lifetime QA record.

- a) Position Description
- b) Position Qualification Statement....,
- d) Documentation Attesting to Completion of Verification"

10 RECOMMENDED ACTIONS (CON'T)

- 2) To clearly document the Verification of Education and Experience Requirements the preferred and/or alternate methods for Verification of Education and Experience as delineated in the QARD Lessons Learned/Program Clarification NO. 93-001 (See Attachment 2) should be adhered to.
- 3) Review Position Qualification Statement to determine if information is relevant to latest position held and that evidence of verification was performed. Letter of Justification as minimum will be required for all position changes.
- 4) Ensure that YLP-2.1Q-YMSCO is revised to provide clear and concise direction for conducting Personnel Qualification including all those activities which have been detailed in recommendations (1) through (3) above. Any differences in processing Federal vs. Contractor Personnel Qualification activities should be clearly delineated.
- 5) Ensure that all supervisory personnel receive training to YLP-2.1Q-YMSCO, "YUCCA MOUNTAIN SITE CHARACTERIZATION OFFICE QUALIFICATION AND TRAINING".
- 6) Ensure those individuals responsible for the implementation and conduct of Personnel Qualifications have been properly trained to YLP-2.1Q-YMSCO.
- 7) Ensure adequate objective evidence of the aforementioned requirements are included in the YMSCO Records System.

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BLOCK 14 REMEDIAL ACTIONS:

It was determined the notes in Attachment 1 were inadvertently switched. Note 2 pertains to the definition of education and experience, and Note 1 pertains to the verification thereof. Proceeding on this basis, the following remedial action response was developed:

1. For Personnel Qualification Records Packages of those Federal Employees referenced in Attachment 1, the following response is provided:

a. Position Qualification Statements (PQS) - The PQS identified as missing in Attachment 1 of the DR ( for Richard L. Craun) will be provided for the training/qualification records.

b. Definition of Education Requirements - For those individuals listed in Attachment 1 that had a PQS in place, the education requirements are defined by the Federal Qualification Standards Handbook for General Schedule Positions, which replaced the Handbook X-118.

c. Definition of Experience Requirements - For those individuals listed in Attachment 1 that had a PQS in place, the experience requirements are defined by the Federal Qualification Standards Handbook for General Schedule Positions, which replaced the Handbook X-118.

d. The DOE Human Resource responsibilities and processes for verification of education and experience are covered specifically by the Qualification Standards Handbook for General Schedule Positions. They are also addressed in other ways, as referenced in DOE Order 3731.1, "Suitability, Position Sensitivity Designations, and Related Personnel Matters. "It was not the intent of the letters from Human Resources to document the process for performing this verification but to state that it had been performed using the required DOE Human Resources policies. Any letters for verification of education and experience which do not reference the appropriate documents for performing this action will be revised to include the correct references.

e. If necessary, a Justification Statement will be provided for education or experience which could not be verified.

2. The action taken to verify education and experience is included in YLP-2.1Q-YMSCO. This action is considered a step in the process of qualifying personnel and not a process in itself (refer to the QARD, which defined "verification" as, "the act of reviewing, inspecting, testing, checking . . .").

3. All Position Qualification Statements for Federal employees are being reviewed to assure the information is relevant to the latest position held and verification was performed.

4. YLP-2.1Q-YMSCO will be replaced by AP2.1Q and AP2.2Q as soon as comments can be resolved. See 2 above.

5. All supervisory personnel have been trained to YLP-2.1Q-YMSCO.

6. Human Resource personnel who perform verification of education and experience will not be trained to YLP-2.1Q-YMSCO. See 1d and 2 above.

7. Objective evidence of the verification of education and experience is maintained in Human Resource records, as required by Human Resource policies, directives, and procedures. A QA surveillance of the verification of education and experience and the objective evidence of such verifications, which is maintained in official personnel folders, was performed by Robert B. Constable in August 1994. According to the report, "the surveillance results determine that the records of YMSCO and YMQAD DOE

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personnel whose verification of education and experience was performed at Las Vegas, NVO, is complete, on file, readily retrievable, and in compliance with YLP-2.1Q-YMPO, Revision 0, Requirements." The letters from Human Resources stating the verifications have been performed, using DOE Human Resource policies, are included in the YMSCO, records system.

Needs to be checked.

ATTACHMENT I

EMPLOYEE	POS IN PLACE	EDUCATION REQUIREMENTS DEFINED	EXPERIENCE REQUIREMENTS DEFINED	EDUCATION VERIFIED	EXPERIENCE VERIFIED	JUSTIFICATION FOR EDUCATION	JUSTIFICATION FOR EXPERIENCE
MARK C. TYNAN	YES	NO NOTE 1	NO NOTE 1	X-118 SEE NOTE 2	X-118 SEE NOTE 2	N/A	N/A
RICHARD CRAUN	NO	NO	NO	SEE NOTE 2	SEE NOTE 2	N/A	N/A
JOHN G. GANDI	YES	NO NOTE 1	NO NOTE 1	SEE NOTE 2	SEE NOTE 2	N/A	N/A
MICHAEL VALENTINE	YES	NO	NO	YES	YES	N/A	N/A

NOTE 1: Memo in personnel file that states, "DOE Education and Employment Records Verification of Education and Employment have been completed for the DOE Employee. These verifications have been completed in accordance with DOE Order 3731.1, Suitability, Position Sensitivity and Related Personnel Matters."

NOTE 2: Memo in personnel file that states, "Position descriptions for federal employees are written and processed in accordance with procedures established by the OPM. Minimum education and experience requirements are documented in the OPM Handbook X-118, Qualification Standards for Position Under the General Schedule."

N/A: Not Applicable



**CIVILIAN RADIOACTIVE WASTE MANAGEMENT (CRWM) PROGRAM  
OFFICE OF QUALITY ASSURANCE (OQA)  
LESSONS LEARNED/PROGRAM CLARIFICATION NO. 93-001**

**SUBJECT**

QA Program Element 2.0, Quality Assurance Program, specifically: Verification of Minimum Education and Experience.

**CONDITION SUMMARY**

Some CRWM affected organizations are unaware of the different methodologies of satisfying the requirement for Verification of Minimum Education and Experience.

**RESOLUTION**

**Education Verification**

**Preferred Method:** On company letterhead, request written verification of the highest level of education the employee (or potential employee) had earned from the school Office of the Registrar. Request verification of degree(s) awarded, (or transcript) education major, and dates attended.

**Alternate Method:** Telephone the school's Office of the Registrar, identify your company and yourself, and request verification of the highest level of education the employee (or potential employee) had earned. Record the following information:

- Date and time
- Telephone number
- Registrar staff member's name providing information
- Degree(s) awarded
- Education major
- Dates attended
- (units toward degree, if a degree was not awarded)
- The signature and date of the requestor

**Note:** An employee furnished copy of a diploma or transcript is not satisfactory for use as objective evidence in education verification.

**Experience Verification**

**Preferred Method:** On company letterhead, request written verification of work experience from the employee's previous employer(s) for the dates and position descriptions cited on the employee's resume.

**CIVILIAN RADIOACTIVE WASTE MANAGEMENT (CRWM) PROGRAM OFFICE OF  
QUALITY ASSURANCE (OQA)**

**LESSONS LEARNED/PROGRAM CLARIFICATION NO. 93-001**

(continued)

**Alternate Method:** Telephone the employee's previous company personnel department or previous department manager. Identify your company and yourself and request verification of the employee's work experience. Record the following information:

- Date and time
- Company name, address and telephone number, personnel staff member name or previous department staff member providing the information.
- Dates employed
- Position description
- The signature and date of the requestor.

In the event that the employee's previous company is out of business or personnel records are no longer available, due to time duration since being employed by the company, it is permissible to contact person(s) that have personal knowledge of the employee's work history for a specified time frame. Record the following information:

- Date and time
- Persons name, address and telephone number providing the information
- Confirmation of the dates provided on employee's resume. Record actual time frame being evaluated
- Position description title, or job title
- The signature and date of the requestor.

**Note:** Objective evidence accumulated or generated for the purpose of education and experience verification is subject to surveillance and audit.

**BASIS FOR RESOLUTION**

DOE/RW/0333P, Rev.#0 QARD, QA Element 2.0, Quality Assurance Program. Paragraph 2.2.11 Personnel Selection, Indoctrination, Training and Qualification. Item F. states "Ensure minimum education and experience are verified or, when minimum education and experience cannot be specifically verified, provide a statement and justification for the personnel assignment."

 5/11/93  
Date

Donald G. Horton  
Director  
Office of Quality Assurance