



# Department of Energy

Washington, DC 20585

QA: L

APR 16 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

## VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT (DR) YM-96-D-104 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) SURVEILLANCE YAP-SR-96-023 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT AND OPERATING CONTRACTOR

The OQA staff has verified the corrective action to DR YM-96-D-104 and determined the results to be satisfactory. As a result, the Corrective Action Request is considered closed.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Donald J. Harris at (702) 794-1467.

  
Donald G. Horton, Director  
Office of Quality Assurance

OQA:JB-1342

Enclosure:  
DR YM-96-D-104

cc w/encl:

T. A. Wood, DOE/HQ (RW-55) FORS  
V. O. Thoma, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
B. R. Justice, M&O, Las Vegas, NV  
R. A. Morgan, M&O, Las Vegas, NV

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV  
D. J. Harris, OQA/QATSS, Las Vegas, NV  
D. G. Sult, OQA/QATSS, Las Vegas, NV  
M. R. Diaz, DOE/OQA, Las Vegas, NV

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PDR WASTE  
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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-96-D-104  
PAGE 1 OF 3  
QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

U S. Department of Energy/RW-0333P, Quality Assurance  
Requirements and Description (QARD), Revision 5

2 Related Report No.

SR-96-023

3 Responsible Organization:

Civilian Radioactive Waste Management System  
Management and Operating Contractor

4 Discussed With:

J. Verden, J. Herbert

5 Requirement/Measurement Criteria:

Section 5.2 states: "Work shall be performed in accordance with controlled implementing documents."

YAP-17.1Q, Revision 0, Section 5.3.3.a and 7 states: "Refer to Attachment 9.5 Record Preparation, for requirements to identify, generate, and prepare records for retention in the Records Management System (RMS) to insure QA records are completed appropriate to the work accomplished."

Attachment 9.5 states in part: "When parts of a record are intentionally obliterated, a statement signed and dated by the appropriate Record Source (RS) shall be included with the record that indicates that the obliterated information does not impact the technical meaning or content of the record. Unintentional obliterations will be corrected per Attachment 9.4. Record data on records and drawings in dark markings against a light background.

Statements indicating that blank lines and spaces are intentional shall specify the pages of the affected blanks. Ensure that records packages are legible."

(See Page 3)

6 Description of Condition:

QA records packages accepted and in storage at the RMS have been changed/corrected, obliterated, and enhanced without the identification of the authorized person and the date when those changes took effect. Furthermore, some of these are illegible, with intentional blanks and spaces without any explanatory statements; some have been corrected after authentication took place without being approved by the originating organization.

Examples are:

Accession Number      Adverse Conditions

MOY. 960528-07      Records corrected after authentication without documented evidence of originating organization approval.

(See Page 3)

7 Initiator

M. R. Diaz *M. R. Diaz* Date 9/19/96

9 Is condition an isolated occurrence?

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

10 Recommended Actions: (Not required for PR)

1. Correct the QA records identified as deficient in accordance with procedural requirements.
2. Review and evaluate other QA records to verify compliance with these requirements and make appropriate corrections of deficient records. Provide objective evidence of review, evaluation, and corrective actions taken.

11 QA Review:

QAR *M. R. Diaz* Date 9-30-96

12 Response Due Date

20 working days from issuance

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

Printed Name *Richard E. Sence* Signature *[Signature]*

Date *10/3/96*

22 Corrective Action Verified

QAR *M. R. Diaz*

Date *8/3/97*

23 Closure Approved by: (QAR for PR)

*[Signature]* *ACQAM*

Date *4/15/97*

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

PR/DR NO. YM-96-D-104  
PAGE 2 OF 3  
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

Records are being returned to the sources for correction of discrepancies identified in DR, section 6, Description of Conditions. Other remedial actions are also identified in attached Investigation Plan, Discrepancy Report No. YM-96-D-104, dated October 30, 1996.

15 Extent of Condition: (Not required for PR)

Extent of Condition to be determined by the attached Investigation Plan. Amended response will be submitted upon completion of investigation.

16 Root Cause Determination: (Not required for PR)

Required ☒ Yes ☐ No

A root cause will be determined when an investigation is completed per the Investigation Plan.

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

Required ☒ Yes ☐ No

Will be determined per the investigation Plan.

18 Corrective Action Completion Due Date:

12/16/96

19 Response by: Jan Verden

☒ Initial  
☐ Amended

*Janice D. Verden*  
Date 10/31/96

Phone 794-7770

20 Response Accepted

OAR

*Paris Han*

Date 11-8-96

21 Response Accepted (N/A for PR):

ACQAM

*Janice D. Verden*

Date 11/13/96

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

<sup>8</sup> ☐ Performance Report  
☒ Deficiency Report  
NO. YM-96-D-104  
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**PR/DR CONTINUATION PAGE**

**5 Requirement/Measurement Criteria: (continued)**

Attachment 9.4 states in part: "Changes/corrections to errors shall be made by drawing a single line through the changed/incorrect information and inserting the new information in close proximity along with the initials or signature of the RS or person authorized to make the change/correction and the date the change/correction was made. Insertions and enhancements (e.g., darkening, faint, illegible characters) are considered changes.

To be accepted, records determined to be incomplete or illegible shall be corrected by the RS or authorized individual. Any correction or change of a QA record after authentication shall be approved by the originating organization."

**6 Description of Condition: (continued)**

<u>Accession Number</u>	<u>Adverse Conditions</u>
-------------------------	---------------------------

- |                   |   |
|-------------------|---|
| MOL.19960731.0245 | a) Contains 19 Field Station Data Sheets. Several of them have been corrected without following procedural requirements (drawing a single line through the changed information and inserting the new information in close proximity along with the initials of the RS or authorized person to make the correction and date the correction was made).<br>b) In some cases a line was drawn but the corrected information was not recorded.<br>c) Contains Sheet 27 of the NE/4 BUSTED BUTTE 7.5" QUADRANGLE (which is a map) with recorded information against a dark background which makes it in some cases illegible. |
| MOL.19960711.0316 | a) Contains forms called Tbm data sheet.xls dated 2/22, 23, 29/96 which have been corrected without following procedural requirements.<br>b) Some of the forms are missing the date when they were used.<br>c) Blanks and spaces were intentionally left without the required clarification statement.  |
| MOL.19960717.0122 | a) Contains Key Technical Data Traceability form that has been corrected without following procedural requirements.<br>b) Scientific Notebook with several corrections without following procedural requirements.<br>c) Contains Observers Report forms with over 35 empty spaces where entries should be made. However, a required statement to identify those pages in the records package does not exist.  |
| MOL.19960716.0132 | Scientific Notebook with corrections made without following procedural requirements.  |
| DRC.19960718.0001 | a) In page 4 of Job Package 93-02A correction made without following procedural requirements.<br>b) Daily Drilling Report forms corrections made without following procedural requirements.<br>c) Core Run Record forms corrections made without following procedural requirements.   |
| MOL.19960812.0274 | Some Meteorological Equipment Performance Check or Audit forms show some blanks made without following procedural requirements.   |
| MOL.19960812.0303 | a) Page 34 of 56, corrections made without initials and date.<br>b) Page 43 of 56, recorded information done by a computer was manually enhanced without following procedural requirements.<br>c) Page 50 of 56, corrections made without following procedural requirements.<br>d) Page 52 of 56, recorded information done by a computer was manually enhanced without following procedural requirements.<br>e) Page 56 of 56, corrections made without following procedural requirements.   |

**INVESTIGATION PLAN**  
**Discrepancy Report No. YM-96-D104**  
**October 30, 1996**

**Identified Problem**

Records are illegible, have been changed or corrected, obliterated, and enhanced without the identification of the authorized individual and date, have intentional blanks without explanatory statements, and corrected after completion without the originating organization's approval.

**Investigate Extent of the Problem**

Records Management Department created a plan to determine the extent of the problem:

Examine other records from a sample population a) to determine extent of the problem, b) identify responsible record sources, if possible, c) propose further investigation if warranted, and d) propose remedial action to correct deficiencies identified in YM-96-D104. If further investigation is elected, determine the organization(s) responsible for carrying out such investigation and coordinate.

The plan consists of these elements:

**I Selection Criteria**

The selection criteria are based on:

- 1) the organizations from which the original deficient documents were found:
- 2) the types of records from which the original deficient documents were found:
- 3) the sample will be based on the numbers of records each organization submitted in the previous 12 months, October 1995 through September 1996.
- 4) the sample of records will be documented to identify which records were reviewed.

**II Implementation of the Plan**

Members of the Records Processing Center and Records Services staff will conduct the investigation.

Documentation will include:

- 1) Record accession no.
- 2) Organization
- 3) Record Type
- 4) Identified Deficiencies, or "None"
- 5) Summary describing results and evaluation of the records examined
- 6) The documentation identified will be provided to the QAR for review.

### **III Schedule**

After the investigation is completed, a supplemental response to YM-96-D104 will be forwarded. The coordination that may be required with the remote sites calls for additional time to be necessary:

- |   |             |
|---|-------------|
| a) Determine sample<br>and record types | 2 work days |
| b) Conduct investigation                | 5 work days |
| c) Documentation                        | 5 work days |

The time required for the investigation and remedial actions necessitates a scheduled completion of December 16, 1996.

**Discrepancy Report No. YM-96-D104**  
**Supplemental Response**

1. The records packages noted in item 6, page 1 and page 3 of the DR have been corrected. They were defined as having been obliterated, not legible, and missing information, etc., and have been corrected.
2. The investigation of the record packages have been completed in accordance with the Investigation Plan, III: Response schedule.

**SUMMARY:**

- A. A sample of record types was determined and examples are attached.
- B. A list of documents that required correction was defined and sent to the various remote site sources to be corrected.
- C. Documentation was also defined and a list of all documents corrected is listed on the attached "Record Discrepancy Notices."

12/16/96 DS [unclear]  
12/23/96

LV RM.JDV 12/96-287

60921

Complete only applicable items

1. TO D. Coleman / Jeff Gromny	2. MAIL STOP 717	3. ORGANIZATION DOE	4. DATE 12/05/96				
5. FROM Kelly McConnell/Bunny Washington	6. MAIL STOP 423	7. ORGANIZATION M+O	8. PHONE (702) 794-7865				
9. IDENTIFIER/TRACKING NO. JP 93-02A							
10. TITLE OR SUBJECT OF RECORD Records Package for Job Package 93-02A. Drill Pad Construction, Drilling, & Testing of Borehole UE-25 NRG-4							
11. Correct the following discrepancy(ies) in the attached record:  <input checked="" type="checkbox"/> Marked pages of the attached record are illegible. Please provide a legible copy.  <input type="checkbox"/> Documentation of acceptability of obliterated information missing. Please provide.  <input type="checkbox"/> Attachments, enclosures, or pages missing. Please provide missing items.  <input checked="" type="checkbox"/> The following indexing information is missing. Please provide: <table border="0"><tr><td><input type="checkbox"/> Title</td><td><input type="checkbox"/> Record date</td></tr><tr><td><input type="checkbox"/> Author's organization</td><td><input checked="" type="checkbox"/> Signature/Initials/Stamp</td></tr></table> <input type="checkbox"/> Access list for privileged records missing. Please provide  <input type="checkbox"/> Errors in Table of Contents as noted below. Please correct.				<input type="checkbox"/> Title	<input type="checkbox"/> Record date	<input type="checkbox"/> Author's organization	<input checked="" type="checkbox"/> Signature/Initials/Stamp
<input type="checkbox"/> Title	<input type="checkbox"/> Record date						
<input type="checkbox"/> Author's organization	<input checked="" type="checkbox"/> Signature/Initials/Stamp						

**PLEASE CORRECT THIS DISCREPANT RECORD, AND RESUBMIT TO THE RPC.****12. ADDITIONAL COMMENTS:**

Three records within this package either have illegible pages, cross-outs or write-overs without initials and dates. Legibility, initialing and dating is required by YAP-17.1Q. These discrepancies were identified in an audit and need to be corrected or a CAR will need to be written by yourself against these records. The following is a description of which records are discrepant and what the discrepancy consists of:

DRC.19960718.0003 - Job Package YMP/JP93-02A, Revision 1 (46 pages) Page 12 is illegible due to the edge of the page being cut-off, page 24 has been dated and initialed and is illegible due to the date not being deducible, and page 29 has a date and initial and the date is not legible.

DRC.19960718.0015 - Reeco Daily Drilling Reports Dated June 17 through July 22, 1993 (29 pages) Page 2 contains three write-overs that need initials and dates, page 8 contains two write-overs that need initials and dates, page 11 contains one write-over that needs initials and a date, page 23 contains one write-over that needs initials and a date, page 26 contains one write-over and one cross-out that have been initialed but not dated, page 28 contains four cross-outs and one write-over all need a date and two of the cross-outs and the one write-over need initials, and page 29 contains one cross-out that has been initialed but not dated.

DRC.19960718.0039 - YMP Core Run Records Dated June 25 through July 21, 1993 (63 pages) Pages 2, 4, 6, 8, 10, 14, 16, 18, and 20 have a cross-out that needs a date and initials.



Complete only applicable items

1. TO Shannon Mahda	2. MAIL STOP	3. ORGANIZATION USGS	4. DATE 12/05/96
5. FROM Kelly McConnell/Charlene Vondriska	6. MAIL STOP 423	7. ORGANIZATION M+O	8. PHONE (702) 794-7865
9. IDENTIFIER/TRACKING NO. DTN 950208315142.002			
10. TITLE OR SUBJECT OF RECORD Thermoluminescence Data: TL-22 through TL-33, Total Bleach, Partial Bleach, & Sunlight Sensitivity Tests (Supplement)			
11. Correct the following discrepancy(ies) in the attached record:  <input checked="" type="checkbox"/> Marked pages of the attached record are illegible. Please provide a legible copy.  <input type="checkbox"/> Documentation of acceptability of obliterated information missing. Please provide.  <input type="checkbox"/> Attachments, enclosures, or pages missing. Please provide missing items.  <input type="checkbox"/> The following indexing information is missing. Please provide: <div style="display: flex; justify-content: space-between;"><div><input type="checkbox"/> Title</div><div><input type="checkbox"/> Record date</div></div> <div style="display: flex; justify-content: space-between;"><div><input type="checkbox"/> Author's organization</div><div><input type="checkbox"/> Signature/Initials/Stamp</div></div> <input type="checkbox"/> Access list for privileged records missing. Please provide  <input type="checkbox"/> Errors in Table of Contents as noted below. Please correct.			
<b>PLEASE CORRECT THIS DISCREPANT RECORD, AND RESUBMIT TO THE RPC.</b>			
12. ADDITIONAL COMMENTS: A Record Source Audit was conducted recently and a couple of discrepancies were located within the above mentioned records package. The discrepancies identified were not the responsibility of the RPC to correct, however we volunteered to inform the various sources and have the discrepancies corrected to avoid a CAR situation. Item 2 on the TOC - Anomalous Fading Experiments for TL-25-27, 30-32 contains write-overs and cross-outs that need dating and initialing, and some of the pages are illegible. Page 29 is illegible, page 34 is illegible and has three cross-outs, page 43 is illegible and has eighteen sets of write-overs, page 44 is illegible, page 50 has two cross-outs, page 52 has one write-over, and page 56 has two write-overs. The enhancements and cross-outs need to be dated and initialed and the illegible pages need to be enhanced or a legible copy must be provided. Please make a new Table of Contents using the same title as the previous package and state the package is correcting MOL.19960812.0302. List the 56 pages of experiments and state that the record is correcting MOL.19960812.0303 (be sure to date and initial the identified discrepancies). Submit this new corrected package with a new transmittal to the RPC with the discrepancy attached within ten days. If you can not make the required corrections you must initiate a CAR against the package. If the RPC does not receive a corrected package or a response from the source within the ten days, a CAR will be initiated by the RPC. If you have any questions please contact Kelly McConnell 794-7865 or Charlene Vondriska 794-7772.			

8 of 21

Complete only applicable items

1. TO E. Majer	2. MAIL STOP	3. ORGANIZATION LBL	4. DATE 12/05/96
5. FROM Kelly McConnell/Charlene Vondriska	6. MAIL STOP 423	7. ORGANIZATION M+O	8. PHONE (702) 794-7865

9. IDENTIFIER/TRACKING NO.

0BB02 &amp; 0BB03

10. TITLE OR SUBJECT OF RECORD

Results of Geophysical Surveys Along the North-South and ESF Alignment &amp; Summary Report: Interpretation of Multiple.....

## 11. Correct the following discrepancy(ies) in the attached record:

- ☒ Marked pages of the attached record are illegible. Please provide a legible copy.
- ☐ Documentation of acceptability of obliterated information missing. Please provide.
- ☐ Attachments, enclosures, or pages missing. Please provide missing items.
- ☐ The following indexing information is missing. Please provide:
- |  |   |
|--|---|
| <input type="checkbox"/> Title                 | <input type="checkbox"/> Record date              |
| <input type="checkbox"/> Author's organization | <input type="checkbox"/> Signature/Initials/Stamp |
- ☐ Access list for privileged records missing. Please provide
- ☐ Errors in Table of Contents as noted below. Please correct.

## PLEASE CORRECT THIS DISCREPANT RECORD, AND RESUBMIT TO THE RPC.

## 12. ADDITIONAL COMMENTS:

A Record Source Audit was conducted recently and a couple of discrepancies were located within the above mentioned records package. The discrepancies identified were not the responsibility of the RPC to correct, however we volunteered to inform the various sources and have the discrepancies corrected to avoid a CAR situation. Item 4 on the TOC - Key Technical Data Traceability form contains a cross-out that needs to be dated and initialed. Item 5 on the TOC - Gravity Survey Notebook (1st notebook) contains on page sixteen two write-overs, on page 26 there are two write-overs, on page 27 there is one write-over, on page 28 there is one write-over, and on page 33 there is one write-over; they all need to be dated and initialed. Item 5 (2nd notebook) contains four cross-outs on page 5, two cross-outs and a write-over on page 6, three cross-outs on page 7, two cross-outs on page 10, two cross-outs on page 11, three cross-outs on page 12, one cross-out and one write-over on page 13, two cross-outs on page 14, one cross-out on page 15, two cross-outs on page 16, one cross-out on page 17, one cross-out and an illegible line on page 18, one cross-out on page 19, two cross-outs on page 40, and two write-overs on page 52; they all need to be dated and initialed and the illegible page needs to be enhanced or a legible copy provided. Item 7 on the TOC - Observers Report contains blanks that require a statement specifying each page having blanks and that they are not intentional. Please make a new Table of Contents using the same title as the previous package and state the package is correcting MOL.19960717.0122. List the Key Tech Data Form as a record correcting MOL.19960717.0123. List the notebooks as corrections to MOL.19960717.0131 and MOL.19960717.0132. List the Observers Reports as correcting MOL.19960717.0134. Submit this new corrected package with a new transmittal to the RPC with the discrepancy attached within ten days. If you can not make the required corrections you must initiate a CAR against the package. If the RPC does not receive a corrected package or a response from the source within the ten days, a CAR will be initiated by the RPC. If you have any questions please contact Kelly McConnell 794-7865 or Charlene Vondriska 794-7772.

*Complete only applicable items*

1. TO K. Pruess	2. MAIL STOP	3. ORGANIZATION LBL	4. DATE 12/05/96
5. FROM Kelly McConnell/Charlene Vondriska	6. MAIL STOP 423	7. ORGANIZATION M+O	8. PHONE (702) 794-7865
9. IDENTIFIER/TRACKING NO. Milestone OB14			
10. TITLE OR SUBJECT OF RECORD Two-Phase Flow Experiments in Natural Rock Fractures from Yucca Mountain			
11. Correct the following discrepancy(ies) in the attached record:  <input type="checkbox"/> Marked pages of the attached record are illegible. Please provide a legible copy.  <input type="checkbox"/> Documentation of acceptability of obliterated information missing. Please provide.  <input type="checkbox"/> Attachments, enclosures, or pages missing. Please provide missing items.  <input type="checkbox"/> The following indexing information is missing. Please provide: <div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Title</div><div><input type="checkbox"/> Record date</div></div> <div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Author's organization</div><div><input type="checkbox"/> Signature/Initials/Stamp</div></div> <input type="checkbox"/> Access list for privileged records missing. Please provide  <input type="checkbox"/> Errors in Table of Contents as noted below. Please correct.			

**PLEASE CORRECT THIS DISCREPANT RECORD, AND RESUBMIT TO THE RPC.****12. ADDITIONAL COMMENTS:**

A Record Source Audit was conducted recently and a couple of discrepancies were located within the above mentioned records package. The discrepancies identified were not the responsibility of the RPC to correct, however we volunteered to inform the various sources and have the discrepancies corrected to avoid a CAR situation. Item 3 on the TOC - Scientific Notebook paginated 1-147, contains cross-outs and write-overs that need to be dated and initialed. Page 1 has one cross-out, page 8 has four cross-outs, page 9 has two cross-outs, page 16 has a cross-out, page 17 has two cross-outs, page 26 has a cross-out, page 32 has three cross-outs, page 55 has a cross-out, page 59 has a cross-out, page 68 has a cross-out, page 69 has a cross-out, page 75 has a cross-out and a write-over, page 90 has a cross-out, page 95 has a cross-out, page 96 has a cross-out, page 102 has a cross-out, page 119 has a cross-out, and page 144 has two cross-outs; they all need to be dated and initialed. Please make a new Table of Contents using the same title as the previous package and state the package is correcting MOL.19960716.0132. List the 149 (there is 149 page counting the two beginning pages) page notebook on the new TOC and state that the record is correcting MOL.19960716.0136 (be sure to date and initial the identified discrepancies). Submit this new corrected package with a new transmittal to the RPC with the discrepancy attached within ten days. If you can not make the required corrections you must initiate a CAR against the package. If the RPC does not receive a corrected package or a response from the source within the ten days, a CAR will be initiated by the RPC. If you have any questions please contact Kelly McConnell 794-7865 or Charlene Vondriska 794-7772.

Complete only applicable items

1. TO S. Keller	2. MAIL STOP	3. ORGANIZATION USGS	4. DATE 12/05/96				
5. FROM Kelly McConnell/Charlene Vondriska	6. MAIL STOP 423	7. ORGANIZATION M+O	8. PHONE (702) 794-7865				
9. IDENTIFIER/TRACKING NO. GS940108315142.003							
10. TITLE OR SUBJECT OF RECORD. Field Notes and Station Location Map Supporting Surficial Geologic Mapping of the Northeast 1/4 of the Busted Butte 7.5' Quad..							
<p>11. Correct the following discrepancy(ies) in the attached record:</p> <p><input checked="" type="checkbox"/> Marked pages of the attached record are illegible. Please provide a legible copy.</p> <p><input type="checkbox"/> Documentation of acceptability of obliterated information missing. Please provide.</p> <p><input type="checkbox"/> Attachments, enclosures, or pages missing. Please provide missing items.</p> <p><input type="checkbox"/> The following indexing information is missing. Please provide:</p> <table border="0"> <tr> <td><input type="checkbox"/> Title</td> <td><input type="checkbox"/> Record date</td> </tr> <tr> <td><input type="checkbox"/> Author's organization</td> <td><input type="checkbox"/> Signature/Initials/Stamp</td> </tr> </table> <p><input type="checkbox"/> Access list for privileged records missing. Please provide</p> <p><input type="checkbox"/> Errors in Table of Contents as noted below. Please correct.</p>				<input type="checkbox"/> Title	<input type="checkbox"/> Record date	<input type="checkbox"/> Author's organization	<input type="checkbox"/> Signature/Initials/Stamp
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<input type="checkbox"/> Author's organization	<input type="checkbox"/> Signature/Initials/Stamp						

**PLEASE CORRECT THIS DISCREPANT RECORD, AND RESUBMIT TO THE RPC.****12. ADDITIONAL COMMENTS:**

A Record Source Audit was conducted recently and a couple of discrepancies were located within the above mentioned records package. The discrepancies identified were not the responsibility of the RPC to correct, however we volunteered to inform the various sources and have the discrepancies corrected to avoid a CAR situation. Item 6 on the TOC - Field Station Data Sheets paginated 1-18 contain cross-outs, write-overs, and illegibility. Page 1 contains a cross-out, page 2 has three write-overs, page 3 has two cross-outs and three write-overs, page 4 has a cross-out, page 5 has a cross-out, page 8 has a cross-out, page 11 has a write-over, page 13 has a cross-out, page 16 has two cross-outs, page 17 has three cross-outs, and page 18 has two cross-outs; they all need a date and initials. Page 12 contains illegibility, a legible or enhanced copy must be provided. Item 8 on the TOC - NE 1/4 Busted Butte 7.5" Quadrangle map has an illegible date, enhancement or a legible copy must be provided. Please make a new Table of Contents using the same title as the previous package and state the package is correcting MOL.19960731.0245. List the 19 pages of data sheets on the new TOC and state that the record is correcting MOL.19960731.0249 (be sure to date and initial the identified discrepancies). List the map on the new TOC stating that it is correcting MOL.19960731.0251. Submit this new corrected package with a new transmittal to the RPC with the discrepancy attached within ten days. If you can not make the required corrections you must initiate a CAR against the package. If the RPC does not receive a corrected package or a response from the source within the ten days, a CAR will be initiated by the RPC. If you have any questions please contact Kelly McConnell 794-7865 or Charlene Vondriska 794-7772.

Complete only applicable items

1. TO M.C. Brady	2. MAIL STOP	3. ORGANIZATION SNL	4. DATE 12/05/96				
5. FROM Kelly McConnell/Charlene Vondriska	6. MAIL STOP 423	7. ORGANIZATION M+O	8. PHONE (702) 794-7865				
9. IDENTIFIER/TRACKING NO. SNF32020196001.007							
10. TITLE OR SUBJECT OF RECORD DTP for "Rock Mass Quality Data for ESF Main Drift Stations 42+15 to 44+30 Meters"							
11. Correct the following discrepancy(ies) in the attached record:  <input type="checkbox"/> Marked pages of the attached record are illegible. Please provide a legible copy.  <input type="checkbox"/> Documentation of acceptability of obliterated information missing. Please provide.  <input type="checkbox"/> Attachments, enclosures, or pages missing. Please provide missing items.  <input type="checkbox"/> The following indexing information is missing. Please provide: <table border="0"><tr><td><input type="checkbox"/> Title</td><td><input type="checkbox"/> Record date</td></tr><tr><td><input type="checkbox"/> Author's organization</td><td><input type="checkbox"/> Signature/Initials/Stamp</td></tr></table> <input type="checkbox"/> Access list for privileged records missing. Please provide  <input type="checkbox"/> Errors in Table of Contents as noted below. Please correct.				<input type="checkbox"/> Title	<input type="checkbox"/> Record date	<input type="checkbox"/> Author's organization	<input type="checkbox"/> Signature/Initials/Stamp
<input type="checkbox"/> Title	<input type="checkbox"/> Record date						
<input type="checkbox"/> Author's organization	<input type="checkbox"/> Signature/Initials/Stamp						
<b>PLEASE CORRECT THIS DISCREPANT RECORD, AND RESUBMIT TO THE RPC.</b>							
12. ADDITIONAL COMMENTS: A Record Source Audit was conducted recently and a couple of discrepancies were located within the above mentioned records package. The discrepancies identified were not the responsibility of the RPC to correct, however we volunteered to inform the various sources and have the discrepancies corrected to avoid a CAR situation. Item 3 on your Table of Contents - Memo with Tbm data Sheets (paginated 1-43) attached, has a write-over on page 19 and page 35 that require a date and initials. Since this package has already been processed by the RPC a corrected package needs to be submitted. Attached is a copy of the TOC and a copy of the 84 pages listed that contain the TBM sheets. Please make a new Table of Contents using the same title as the previous package and state the package is correcting MOL.19960711.0316. List the 84 pages on the new TOC and state that the record is correcting MOL.19960711.0319 (be sure to date and initial the two write-overs). The statement "All blanks are intentional" on the TOC needs to specify which pages (within the 84 pages, per YAP-17.1Q). Submit this new corrected package with a new transmittal back to the RPC with the discrepancy attached within ten days. If you can not make the required corrections you must initiate a CAR against the package. If the RPC does not receive a corrected package or a response from the source within the ten days, a CAR will be initiated by the RPC. If you have any questions please contact Kelly McConnell 794-7865 or Charlene Vondriska 794-7772.							

**USGS - Batch Number: MOY-960917-22, Data package - Provisional results: Geotechnical data - ESF, North Ramp for Full Periphery Geotechnical Maps of the North Ramp, Exploratory Studies Facility, Stations 8 + 00 to 10 + 00, WBS Number 1.2.3.3.2.2.1.2; Activity Number 8.3.1.4.2.2.4 DTN: GS960408314224.001**

**USGS - Batch Number: MOY-960917-22, Data package - Provisional results: Geotechnical Report: Full Peripheral maps - North Tamp of the Exploratory Studies Facility, Station 4 + 00 to 8 + 00, WBS Number 1.2.3.2.2.1.2; Activity Number 8.3.1.5.2.2.5 DTN: GS960408314224.004**

**USGS - Batch Number: MOY-960930-04, Data package - Provisional results: Geotechnical Data - ESF, North Ramp Periphery Geotechnical Maps (drawings OA-46-204 through OA-46-212) and Rock mass Quality Ratings Report for Stations 10 + 00 to 18 + 00, WBS Number 1.2.3.2.2.1.2: Activity Number 8.3.1.4.2.2.4 DTN: GS960408314224.003**

**LLNL - Batch Number: MOY-961011-04, Data package - Geomechanical analysis of the Large Block Test; Document Number UCRL-ID-122898, Traceability Number LLYMP9609090**

**LLNL - Batch Number: MOY-961030-10, Data package - Ten-year results from unsaturated drip tests with UO<sub>2</sub> at 90C: Implications for the corrosion of Spent Nuclear Fuel, Traceability Number LLYMP0606114**

**LLNL - Batch Number: MOY-961030-10, Data package - A study of americium (III) carbonate complexation at elevated Temperatures by pulsed laser photoacoustic spectroscopy, Document Number UCRL-JC-125198, Traceability Number LLYMP9610043**

**LLNL - Batch Number: MOY-961030-10, data package - Complete scientific notebook 00245, p.s. 1-160, issued 12/19/95, Traceability Number LLYMP9610047**

**Sandia National Laboratories (SNL) - Batch Number: MOY-961101-03, Audit/Surveillance - Surveillance report 96-03, Traceability Number RMS SL\*151543**

**M&O - Batch Number: MOY-961012-06, Audit/Surveillance - Performance audit on hi-volumn samplers of 1996**

**M&O - Batch Number: D.C.-961016-04, Job package - Job package 95-22 records - job package 95-22, Accession numbers DRC.19961023.0059-through-DRC.19961023.0069.**

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## 14. Remedial Action:

Records identified as deficient in the Deficiency Report (DR) and a result of the investigation plan were documented on a Records Discrepancy Notice (QAP-17-2) and returned to the Affected Organization's record sources for correction.

## 15. Extent of Condition:

1) Record discrepancies of 1-5% of the total population submitted during the period of October 1995 through February 22, 1997, are probable.

## 2) Impact of the Discrepancies:

The discrepancies were reviewed for type and impact. Illegibility impacted nontechnical information, such as numbers, elevations on topographical maps (which could be deduced from surrounding context), etc. RMD staff checked with remote site record sources who confirmed that the types of errors discovered have no significant impact on the technical meaning of the records.

## 16. Root Cause Determination:

See attached Root Cause Determination Questionnaire. The cause category was determined to be 2Aa, Personnel, Lack of Attention to a Task, Carelessness, and applies to the record sources.

## 17. Action to Preclude Recurrence:

A. Training was conducted on the Administrative Procedure, AP-17.1Q, Revision 0, in the time preceding its effective date (11/22/96), and afterwards, including classroom training (required for managers/supervisors, Records Coordinators, and RPC staff, self reading was required for everyone else who generates records or records packages). In addition, training (classroom) on the issues identified by this DR, or on similar issues, has been conducted on several occasions.

B. 1) A confidence level that 100% of records will be error-free is unrealistic and probably unattainable, given the nature of the task and of human beings. To resolve the problem, Records Management Department developed a discrepancy resolution system and incorporated it within Civilian Radioactive Waste Management System Management and Operating Contractor procedure QAP-17-2, 5.4.1.C. This system (after discovery of the discrepancy by the RPC) consists of the following steps:

- \* Contact the record source and attempt to resolve the discrepancy informally
- \* (If the informal contact was unsuccessful in resolving the discrepancy) document the discrepancy on a Record Discrepancy Notice
- \* Forward the Record Discrepancy Notice to the record source for resolution along with the discrepant record or records package
- \* Elevate disputes to RPC Supervisor or RM Manager, if necessary

In addition, there are time limits imposed both for the informal contact and for the completion of the correction by the record source. This methodology has been in operation for several years.

2) The procedure, QAP-17-2, has one drawback: it does not necessarily inform management of trends or repetitive conditions. For that reason, and others, another method has been set up to capture *all* discrepancies, whether documented or not, divide them into categories, and report them to the applicable Records Coordinator *and* manager. This method depends on the RPC staff tracking all discrepancies, trending those discrepancies, reporting to the Records Liaison (member of the RPC staff), who then reports to the Records Coordinator and manager for action. This method has been implemented by the RPC staff, but the recent effective date (2/22/97) of the AP has not permitted sufficient time for full implementation.

C. The issue of AP-17.1Q (issued 11/22/96) ameliorated the problem of a confusing procedure with a clearer, more logical detail and flow. Because of some new requirements the AP imposed, there was a grace period permitted for record sources who had records or records packages in progress on 11/22/96; that period ended 2/22/97. Since 2/22, there have been 19 days in which RPC personnel have checked for noncompliance with the newly revised procedure, hardly sufficient time to implement the Records Liaison system, since the AP now permits 90 days before a record or records package must be submitted to the RPC (instead of the previous requirement of submittal within 20 work days).

D. The following answers the question, "Why did the RPC not discover the documented discrepancies and contact the record source in accordance with QAP-17-2?":

- \* The RPC does not verify *all* AP-17.1Q-required direction to the sources. They only verify about five or six requirements.
- \* Whether a document is legible or illegible is a matter of interpretation of the definition of "legible" in QAP-17-2, which

3/12/97

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which definition permits the *deduction* of the illegible information from the context.

\* There are also technical imaging concerns that the RPC must meet, e.g., background "clutter," use of color, obliterated information caused by the RPC processing, etc. Many things concern legibility and preparation for scanning such as bent corners, staples, clips, skewed images, dark/light contrast, etc.



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*Refer to Subsection 5.2 and 5.3 of AP-16.4Q for amplification of information.*

1. Identify the adverse condition.
  - 1) Submitted records have been changed or corrected, obliterated, enhanced: with no initials & date
  - 2) Submitted records are illegible and have intentional blanks, but no explanatory statement
  - 3) Corrections made after authentication, with no approval by originating organization
  
2. Indicate *Where* the condition was found.

Identified records are from various remote sites as well as the M&O (see no. 8 below) were found after receipt and processing by the Las Vegas M&O Records Processing Center (RPC).
  
3. Note *When* the condition was first found.

Surveillance by M. Diaz, 10/5/96
  
4. Select which major program element(s) was affected. (Waste Acceptance, Storage, Transportation, or Repository.)

Many different records were reviewed, covering different program activities associated with the Exploratory Studies Facility
  
5. Denote the specific area(s) or discipline(s) of the major program element the condition occurred.

(e.g., engineering, design, ES&H)  
Various areas are involved
  
6. Determine if the condition is isolated or recurring.

Recurring for records transmitted from the record sources during the period from October 1995 through February 22, 1997
  
7. Determine if the condition is hardware (item) or programmatic (procedures, personnel) related or both.

The condition is concerned solely with paperwork, i.e., programmatic
  
8. Denote what organizations are affected by this condition (M&O, USGS, Weston, OCRWM, etc.).

M&O; SNL; LBL; LLNL, USGS

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- 9 Document the changes that have taken place that could have caused the condition.  
Budget reductions to the remote sites caused the termination of the records personnel. Their function had been to review records and records packages for discrepancies. The records had been submitted to the records personnel by record sources prior to shipment to the RPC. The reductions were effective about October 1995.
10. Determine the need for sketches or photographs.  
N/A
11. Determine the need for laboratory tests.  
N/A
12. Identify the physical evidence examined.  
N/A
13. Note the relevant documents reviewed.  
The records cited in the original DR plus the records examined and documented in the supplemental response (dated 12/16/96)
14. Document any other information that may be pertinent to supporting the selection of the correct root cause.  
Inattention to detail on the part of records sources who may or may not read the procedure (AP-17.1Q) prior to completing the records.
15. Interviews conducted: ☐ Yes ☒ No  
If Yes, refer to page 3 of this attachment.

RI or designee: (Print)  
T. L. Mueller

Signature:

*T. L. Mueller*

Date:

3-14-97

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Root Cause Code:  
2Aa

CAR No./DR No.:  
YM-96-D-104

Root Cause:  
Inattention to detail by the record sources.

Justification or Rationale for Selected Root Cause:

The discrepancies noted in the DR and in the DR Investigation Plan Sample confirmed what Records Management (Local Records Centers of the Affected Organizations and the Records Processing Center in Las Vegas) has experienced.

The termination of the Affected Organizations' Local Records Center personnel was a contributing factor, not in the generation of error-free records, but in the records review and correction prior to transmitting to the Records Processing Center. The change in the Procedure from YAP-17.1Q, Records Management Requirements and Responsibilities, to AP-17.1Q, Record Source Responsibilities for Inclusionary Records, did not occur soon enough to be a factor in this issue.

During the time from October 1995 through February 22, 1997, the RPC staff screened the records submitted from the record sources. They accepted many of the illegibilities detected because the information could be deduced if not discerned directly.

In conclusion, the root cause of this documented problem is placed at the records source for creating records incorrectly. The cause category was determined to be Category 2Aa, "Personnel; Lack of Attention to a Task; Carelessness."

Neglecting to add initials and date to a change, illegibility of a number, etc. are recurring problems. Records will probably always have these kinds of discrepancies to a 1-5% of the total population. The change in the procedure (AP-17.1Q) did not occur soon enough to be a factor in this issue. Termination of many records people at the remote sites was a contributing factor, not in the generation of error-free records, but in their subsequent review and correction. The RPC staff's review of the records accepted many of the "illegibilities" because the information could be deduced if not discerned directly. Therefore, the root cause must be placed at those responsible for creating the records incorrectly in the first place. Category 2Aa, "Personnel; Lack of Attention to a Task; Carelessness" applies.

Designee: (Print)

T. MUELLER

Signature:

T. Mueller

Date:

3-14-97

RI: (Print)

J. D. VERDEN

Signature:

Jerri L. Badredine

Date:

3-14-97

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**BLOCK 22, CORRECTIVE ACTION VERIFICATION**

**Remedial Action**

Verified by Sample of Records returned to the records source for correction on a Records Discrepancy Notice that the identified records deficiencies were corrected and resubmitted to the Records Processing Center for the following record packages:

The types of discrepancies noted were:

Cross-outs (No Initial/Date)	22 each
Write-overs (No Initial/Date)	20 each
Legibility	3 each
Initial or Date (Not Legible or Missing)	2 each

Discussed the percentage of discrepancies with Terri Badredine, Records Processing Center Supervisor, and Terry L. Mueller, Record Services Supervisors. It was a consensus that less than 5% of the total population of records submitted between October 1995 and February 1997 contained discrepancies. It was also a consensus that the type of discrepancies would not impact the technical aspect of the records.

**Root Cause**

A Root Cause Determination was completed and resulted in a cause determination that there was a lack of attention and carelessness on the part of the record sources.

**Action to Preclude Recurrence**

- a) Verified by Review of Training Records that formal classroom training to AP-17.1Q, Revision 0, was provided in accordance with an approved Lesson Plan QA-96006, duration 1.5 hours, on the following dates:

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11/25/96	Number of personnel attended	3
11/26/96		5
11/27/96		6
12/3/96		14
12/5/96		3
12/6/96		3
12/6/96		16
12/10/96		20
12/11/96		6
12/13/96		13
12/17/96		10
12/18/96		19
12/19/96		5
12/21/96		6
1/8/97		8
1/9/97		6
1/14/97		11
1/15/97		15
1/21/97		16
1/22/97		9
1/23/97		12
1/29/97		16
1/30/97		3
2/11/97		13
2/20/97		15
2/25/97		1
2/26/97		33
3/5/97		1
3/11/97		37

- b) Verified that QAP 17-2, Revision 3, Receiving and Processing Inclusionary Records, Section 5.4.1 addresses the Records Management Staff Screening the Records, Section 5.4.1C addresses Resolution of Identified Discrepancies and Documenting the Discrepancy on a "Record Discrepancy Notice."
- c) Verified that Records Management instituted a Record Source Requirement Checklist which should capture all record discrepancies, categorize the discrepancies into types and identify the source (M&O, LANL, SNL, etc.), including the individual name. This information is provided to the Records Coordinators and Management, which in turn is reported to the Records Liaison. This

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Source to preclude future problems. This Records Management Discrepancy Trending came effective February 22, 1997.

Verified through discussions with the Records Processing Center's Records Coordinators; Sandra Bolden (M&O), Cheryl Shannon (USGS), Jercqueline Bogashewicz (SNL/LANL/LBNL/LLNL), and Bill Smith, the Records Coordinator over the remote locations records coordinators. The Records Coordinators were familiar with the requirements in QAP 17-2 and the new method of tracking/trending records discrepancies. The Records Coordinators stated that the most recent records from the source have been problem free. Consequently, they have not initiated Records Discrepancy Notices since the 2/22/97 date, therefore no trend information was available.

Records Management acknowledged that a backlog of approximately 13,000 records still exist. This is down from October 1995 in which 50,000 plus records were backlogged.

Donald J. Harris 4/3/97  
Donald J. Harris, QA Representative

April 3, 1997