



Department of Energy
Washington, DC 20585

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APR 16 1997

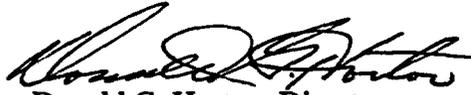
J. H. Boyd, Program Manager
National Spent Nuclear Fuel Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, ID 83401-1563

**ISSUANCE OF DEFICIENCY REPORTS (DR) YM-97-D-029, YM-97-D-030 AND
PERFORMANCE REPORT (PR) YM-97-P-009 RESULTING FROM OFFICE OF QUALITY
ASSURANCE (OQA) AUDIT EM-ARC-97-05 OF THE NATIONAL SPENT NUCLEAR
FUEL PROGRAM**

Enclosed are DRs YM-97-D-029, YM-97-D-030 and PR YM-97-P-009 generated as a result of
OQA Audit EM-ARC-97-05.

Please provide responses to these deficiencies that meet 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 30307, Mail Stop 455, North Las Vegas,
Nevada 89036-0307. Responses to the DRs are due 20 working days from the date of this letter.
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 James Blaylock at (702) 794-1420 or
Charles C. Warren at (702) 794-1487.


Donald G. Horton, Director
Office of Quality Assurance

OQA:JB-1370

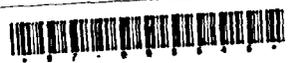
Enclosure:
DRs YM-97-D-029, YM-97-D-030
and PR YM-97-P-009

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OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
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WASHINGTON, D.C.

8 Performance Report
 Deficiency Report
NO. YM-97-D-029
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: PMP 18.02, Revision 1, Administration and Conduct of Audits	2 Related Report No. EM-ARC-97-05
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3 Responsible Organization: EM-67-NSNF Program	4 Discussed With: R. Davis
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5 Requirement/Measurement Criteria:
PMP 18.02, Revision 1, Section 4.c(4), requires Audit Team Members to record conditions adverse to quality on a Deviation and Corrective Action Request (DCAR). The PMP Glossary of Terms and Acronyms, Revision 1, defines a condition adverse to quality as, "a state of noncompliance with quality assurance requirements or when implementing document requirements are not met."

6 Description of Condition:
The below listed audit reports documented instances of noncompliance with QARD requirements and/or procedural requirements of PMPs as Observations rather than as DCARS.

96-NSNF-AU-001
97-NSNF-AU-002
97-NSNF-AU-004

7 Initiator <u>C. C. Warren</u> C. C. Warren Date <u>4/4/97</u>	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown; Must be Yes if PR
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- 10 Recommended Action: (Not required for PR)
- o Evaluate Observations issued during audits to identify those that document a state of noncompliance with quality assurance requirements (condition adverse to quality).
 - o Assure Corrective Actions for Observations identifying conditions adverse to quality are tracked and completed in a timely manner.
 - o Implement action to assure conditions adverse to quality are documented on DCARS in future

11 QA Review: QAR <u>C. C. Warren</u> Date <u>4-8-97</u>	12 Response Due Date 20 working days from issuance
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13 Affected Organization QA Manager Issuance Approval: (QAR for PR) Printed Name D. G. Horton	Signature <u>[Signature]</u> Date <u>4/15/97</u>
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22 Corrective Action Verified QAR Date	23 Closure Approved by: (N/A for PR) AOQAM Date
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WASHINGTON, D.C.

PR/DR NO. YM-97-D-029

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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:

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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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Program Management Procedures - NSNF	2 Related Report No. EM-ARC-97-05
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3 Responsible Organization: EM-67 NSNF	4 Discussed With: Tom Lewallen, Vance Berg, Greg Law
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5 Requirement/Measurement Criteria:
PMP 5.02, Section 4.e.1(c) states, "After resolution of comments and acceptance of the M&O contractor's QARD requirements matrix, [the QAPM] schedules and conducts an on-site implementation audit of the M&O's QA program in accordance with PMP 18.01 and PMP 18.02."

6 Description of Condition:
In violation of the sequence established in PMP 5.02, Section 4.e.1(c), the on-site implementation audit of the Savannah River Site (SRS) was conducted before complete resolution of comments and acceptance of the SRS QARD requirements matrix.

7 Initiator J. E. Clark <i>J E Clark</i> Date 4/4/97	9 Is condition an isolated occurrence? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown; Must be Yes if PR
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- 10 Recommended Action: (Not required for PR)
- Document the resolution of comments and the acceptance of the SRS QARD requirements matrix.
 - Evaluate the impact of conducting the SRS implementation audit before acceptance of the QARD requirements matrix.
 - Determine if the QA program acceptance process needs greater sequencing flexibility and revise PMP 5.02 as appropriate.

11 QA Review: QAR <i>J E Clark</i> Date 4/8/97	12 Response Due Date 20 working days from issuance
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13 Affected Organization QA Manager Issuance Approval: (QAR for PR) Printed Name D. G. Horton, Signature <i>D G Horton</i>	Date 4/15/97
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22 Corrective Action Verified QAR _____ Date _____	23 Closure Approved by: (N/A for PR) AOQAM _____ Date _____
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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

PR/DR NO. YM-97-D-030

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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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RADIOACTIVE WASTE MANAGEMENT
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WASHINGTON, D.C.**

8 Performance Report
 Deficiency Report

NO. YM-97-P-009

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4/19/97

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

QARD, Revision 5

2 Related Report No.

EM-ARC-97-05

3 Responsible Organization:

EM-67-NSNF Program

4 Discussed With:

R. Davis

5 Requirement/Measurement Criteria:

QARD, Revision 5, Section 17.2.1.A requires that documents that provide evidence of the quality of those activities associated with the characterization of DOE Spent Fuel, and conditioning through acceptance of DOE Spent Fuel be classified as lifetime QA records.

6 Description of Condition:

PMP 18.03, Revision 1, "Administration and Conduct of Surveillances" designates surveillance reports that may document the quality of work activities as nonpermanent quality records.

7 Initiator C.C. Warren
C. C. Warren

Date 4/4/97

9 Is condition an isolated occurrence?

Yes No Unknown; Must be Yes if PR

10 Recommended Action: (Not required for PR)

11 QA Review:

QAR

C.C. Warren

Date 4-8-97

12 Response Due Date

20 working days from issuance

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

Printed Name C. C. Warren

Signature

C.C. Warren

Date 4-8-97

22 Corrective Action Verified

QAR

Date

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

AOQAM

Date

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PR/DR NO. YM-97-P-009
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PERFORMANCE/DEFICIENCY REPORT RESPONSE

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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

21 Response Accepted (N/A for PR):

QAR

Date

AOQAM

Date

J. H. Boyd

-2-

APR 16 1997

cc w/encl:

S. E. Gomberg, DOE/HQ (RW-51) FORS

Jeff Williams, DOE/HQ (RW-51) FORS

J. O. Thoma, NRC, Washington, DC

S. W. Zimmerman, NWPO, Carson City, NV

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV

C. C. Warren, OQA/QATSS, Las Vegas, NV

D. G. Sult, OQA/QATSS, Las Vegas, NV

R. W. Clark, DOE/OQA, Las Vegas, NV