



## Department of Energy

Washington, DC 20585

MAY 22 1997

QA: L

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

### ISSUANCE OF DEFICIENCY REPORT (DR) YM-97-D-036 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT SNL-ARP-97-014 OF SANDIA NATIONAL LABORATORIES

Enclosed is DR YM-97-D-036 generated as a result of OQA Audit SNL-ARP-97-014.

Please provide a response to this deficiency that meets the applicable requirements of Administrative Procedure 16.1Q, Performance/Deficiency Reporting. Send the original of your response to Deborah Sult, OQA/QATSS, P.O. Box 30307, Mail Stop 455, North Las Vegas, Nevada 89036-0307. Response to the DR is due 20 working days from issuance. Any extension to the due date must be requested in writing, with appropriate justification, prior to the due date.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Kenneth O. Gilkerson at (702) 794-1486.

Donald G. Horton, Director  
Office of Quality Assurance

OQA:JB-1452

Enclosure:  
DR YM-97-D-036

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PDR WASTE  
WM-11 PDR

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MAY 22 1997

L. D. Foust

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cc w/encl:

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J. O. Thoma, NRC, Washington, DC

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cc w/o encl:

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

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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  
NO. YM-97-D-036  
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**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document:  
DOE/RW 0333P, QARD Revision 5

2 Related Report No.  
SNL-ARP-97-014

3 Responsible Organization:  
M&O SPO

4 Discussed With:  
Michael Brady, Larry Hayes

5 Requirement/Measurement Criteria:  
Supplement III.2.5 A states: "Traceability to its [unqualified data] status as unqualified data shall be maintained."  
Supplement III.2.3 A requires that "Data shall be identified in a manner that facilitates traceability to associated documentation."  
  
Note that QARD Revision 6 Supplement III. 2.3 B states "Data shall be identified in a manner that facilitates traceability to its qualification status."

YAP III.3Q paragraph 5.2 requires that data be identified and tracked as *preliminary* if the acquired data has not received the confirmation of quality assurance. Paragraph 5.3 requires unqualified data to be identified as such on the TDIF.

6 Description of Condition:

Data was obtained from instrumentation installed in the ESF Alcove 5 for the Single Element Heater Test that was not calibrated and/ or not qualified as required by the OCRWM QA program elements 4, 7 and 12 resulting in the data not being "qualified"(see related DR 97-D-025 issued to the M&O). Additionally, the reports resulting from this data and the data submitted into the Technical Information Database are not flagged and identified as suspect or unqualified or preliminary. These instruments and equipment were procured by the M&O for installation by the labs. The M&O is responsible for coordinating the tests and data and DR responses (including corrective action ) with the labs.

Discussion: It was noted during the audit of the M&O at SNL that the remedial action for DR 97-D-025 requires the PI to perform a review of data for impact of the instrumentation being installed without appropriate calibrations being performed. This review was not required to be performed, documented or submitted until August 1997; yet data has been collected and submitted on TDIFs as qualified data and two reports have been generated without flagging the data as unqualified or indeterminate (SNLs SLTR *Pre-Experiment Thermal Hydrological-Mechanical Analyses for the Single Heater Test- Phase 2* and the M&O document *Single Heater Test Interim Report*).

7 Initiator

K.O. Glikerson

Date 04/21/97

9 Is condition an isolated occurrence?

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

10 Recommended Actions: (Not required for PR)

1. Review reports and TDIFs for similar conditions relative to other equipment being used that have open deficiency reports against them that would impact the integrity of the data.
2. Develop a system (similar to the M&Os TBV/TBD design methodology) for flagging data in reports for situations similar to the above, as well as with respect to dissemination of site characterization data from other than the Technical Database (TDB).

11 QA Review

QAR

Date 4/24/97

12 Response Due Date

Twenty Working Days from issuance

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

Printed Name DONALD G. HORTON

Signature

Date 5/21/97

22 Corrective Actions Verified

QAR

Date

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

ADQAM

Date

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

PR/DR NO. YM-97-D-036  
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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):

ADQAMM

Date