



Department of Energy

Washington, DC 20585

QA: L

MAY 20 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

EVALUATION OF AMENDED RESPONSE TO DEFICIENCY REPORT (DR) YM-96-D-101 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) SURVEILLANCE YM-SR-96-026 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM MANAGEMENT AND OPERATING CONTRACTOR

The OQA staff has evaluated the amended response to DR YM-96-D-101. The amended response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this date must be requested in writing, with appropriate justification, prior to that date. Please send a copy of extension requests to Deborah G. Sult, OQA/QATSS, P.O. Box 30307, Mail Stop 455, North Las Vegas, Nevada 89036-0307.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Patrick V. Auer at (702) 794-1432.

Donald G. Horton, Director
Office of Quality Assurance

OQA:JB-1566

Enclosure:
DR YM-96-D-101

cc w/encl:
T. A. Wood, DOE/HQ (RW-55) FORS
J. 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
P. V. Auer, OQA/QATSS, Las Vegas, NV
D. G. Sult, OQA/QATSS, Las Vegas, NV

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

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Quality Assurance Requirements and Description (QARD)/RW-0333P, Revision 5	2 Related Report No. YM-SR-96-026
3 Responsible Organization: Civilian Radioactive Waste Management System Management and Operating Contractor (CRWMS M&O)	4 Discussed With: John Clark

5 Requirement/Measurement Criteria:

QARD, Revision 5, Section 2.2.10, states, in part: "Mandatory comments resulting from the review shall be documented and resolved before approving the document," and Section 5.2.2 states, in part: "Implementing documents shall include the following information as appropriate to the work to be performed: ... Methods for demonstrating that the work was performed as required ..."

6 Description of Condition:

Contrary to the above: CRWMS M&O Quality Administrative Procedures (QAP)-3-8, "Specifications," QAP-3-9, "Design Analysis," and QAP-3-10, "Engineering Drawings," do not specify a method to identify which review comments are designated "mandatory" by the reviewer and do not specify a method to document resolutions of "mandatory" comments.

7 Initiator Patrick V. Auer <i>Patrick V. Auer</i> Date <u>9-16-96</u>	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Action: (Not required for PR)

Revise the procedures cited in Block 6 to implement the QARD requirements identified in Block 5.

11 QA Review: QAR Patrick V. Auer <i>Patrick V. Auer</i> Date <u>9-16-96</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 <u>R.E. SPENCE</u> Signature <u>Robert B. Constable</u> Date <u>9-17-96</u>

22 Corrective Action Verified QAR Date	23 Closure Approved by: (N/A for PR) AOQAM Date
---	--

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RADIOACTIVE WASTE MANAGEMENT
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WASHINGTON, D.C.

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

SEE PR/DR CONTINUATION PAGE (PAGE 3)

15 Extent of Condition: (Not required for PR)

SEE PR/DR CONTINUATION PAGE (PAGE 3)

16 Root Cause Determination: (Not required for PR)

Required ☐ Yes ☒ No

SEE PR/DR CONTINUATION PAGE (PAGE 3)

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

Required ☐ Yes ☒ No

SEE PR/DR CONTINUATION PAGE (PAGE 3)

18 Corrective Action Completion Due Date:

MAY 30, 1997

19 Response by: *ALDEN M. SEGREST*

☒ Initial

☐ Amended

Date *12-2-96* Phone *(702) 794-1924*

20 Response Accepted

QAR *Patricia V. Ch...*

Date *12-6-96*

21 Response Accepted (N/A for PR):

AOQAM *James B. English*

Date *12/19/96*

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PR/DR CONTINUATION PAGE

BLOCK 14 REMEDIAL ACTIONS

Past experience in MGDS Development has proven that it is more effective not to separate editorial from mandatory comments resulting from reviews of design products. As a result of this conclusion, MGDS Development treats all comments as mandatory and all have been and are resolved. We propose to resolve this subject deficiency by generating a PAR for revising procedures QAP-3-8, QAP-3-9 and QAP-3-10. The PAR will add a specific statement in the body of the procedure that when the reviewer signs the REVIEW SUMMARY RECORD the reviewer agrees that review comments made are either incorporated or satisfactorily resolved. (NOTE: This is already in all three procedures in the form instructions.) The PAR will also add the requirement for the originator to indicate that the comment was incorporated or how the comment was resolved. When the PAR is approved the procedures will be revised to incorporate the above action. The expected date to get these three procedures and any other impacted procedures revised is estimated to be May 30, 1997.

BLOCK 15 EXTENT OF CONDITION

The extent of condition is restricted to changing the three procedures. No further action is required. The QAR agrees that we are doing the action but do not have it incorporated into a procedure.

BLOCK 16 ROOT CAUSE DETERMINATION

The condition is isolated therefore no further Root Cause Determination is indicated.

BLOCK 17 ACTION TO PRECLUDE RECURRENCE

All actions to resolve this deficiency are included in BLOCK 14 REMEDIAL ACTIONS therefore there are no further actions required.

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RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
AMENDED RESPONSE WASHINGTON, D.C.

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

Past experience in MGDS Development has proven that it is more effective not to separate editorial from mandatory comments resulting from reviews of design products. As a result of this conclusion, MGDS Development treats all comments as mandatory and all have been and are resolved. We propose to resolve this subject deficiency by generating a PAR for revising procedures QAP-3-8, QAP-3-9 and QAP-3-10. The PAR will add a specific statement in the body of the procedure that when the reviewer signs the REVIEW SUMMARY RECORD the reviewer agrees that review comments made are either incorporated or satisfactorily resolved. (NOTE: This is already in all three procedures in the form instructions.) When the PAR is approved the procedures will be revised to incorporate the above action. The expected date to get these three procedures and any other impacted procedures revised is estimated to be May 30, 1997.

15 Extent of Condition: (Not required for PR)

The extent of condition is restricted to changing the three procedures. No further action is required. The QAR agrees that we are doing the action but do not have it incorporated into a procedure.

16 Root Cause Determination: (Not required for PR)

Required ☐ Yes ☒ No

The condition is isolated therefore no further Root Cause Determination is indicated.

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

Required ☐ Yes ☒ No

All actions to resolve this deficiency are included in BLOCK 14 REMEDIAL ACTIONS therefore there are no further actions required.

18 Corrective Action Completion Due Date:

05/30/07

19 Response by: Alden M. Segrest

☐ Initial

☒ Amended

Date *4/29/97*

Phone 702-295-4416

20 Response Accepted

QAR *Pat Aue*

Date *5-14-97*

21 Response Accepted (N/A for PR):

600AM

Date *5/19/97*