



Department of Energy
 Yucca Mountain Site Characterization
 Project Office
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WBS 1.2.9.3
 QA

JAN 23 1992

Carl P. Gertz, Project Manager, YMP, NV

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF CORRECTIVE ACTION REQUEST (CAR) YM-92-008 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-91-I-01 OF YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT OFFICE

The YMQAD staff has verified the corrective action to CAR YM-92-008 and determined the results to be satisfactory. As a result, the CAR is considered closed.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Neil D. Cox at 794-7236.

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-1694

Enclosure:
 CAR YM-92-008

cc w/encl:
 K. R. Hooks, NRC, Washington, DC
 S. W. Zimmerman, NWPO, Carson City, NV
 J. W. Estella, SAIC, Las Vegas, NV, 517/T-22
 B. J. Verna, MACTEC, Las Vegas, NV

cc w/o encl:
 J. W. Gilray, NRC, Las Vegas, NV
 N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08

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 PDR WASTE PDR
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ADD: Ken Hooks
 Ltr. Encl.
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**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

14CAR NO.: YM-92-008
DATE: 11/6/91
SHEET: 1 OF 1
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document AP-5.32Q, Revision 1, ICN 1		2 Related Report No. Audit YMP-91-I-01	
3 Responsible Organization YMPO		4 Discussed With J. R. Dyer	
10 Response Due 20 days from issuance	11 Responsibility for Corrective Action C. P. Gertz	12 Stop Work Order Y or N No	
5 Requirement: AP-5.32Q, Revision 1, ICN 1, Section 5, Steps 10, 11, and 18e, requires that the DDs/TPOs provide documentation of prerequisites to the Project Engineer (PE), that the PE incorporate documentation of prerequisites into the test planning package, and that the PE compile the test planning package ... e. with documentation of completion of prerequisites.			
6 Adverse Condition: Test Planning Packages (TPPs) do not address prerequisites. Discussion: Neither TPP 91-32 nor TPP 91-34 specifically addresses prerequisites, and it is impossible to tell from the evidence whether prerequisites were incorporated or if any were received from the DDs/TPOs.			
7 Recommended Action(s): Correct the discrepancies identified; investigate to determine if similar discrepancies exist. Take action to resolve recurrence such as changing AP-5.32Q to require that prerequisites be identified specifically or a statement be made saying there were no prerequisites.			
8 Initiator & Date: Neil D. Cox 10/29/91 <i>Neil D. Cox 10/29/91</i>		9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: OQA <i>James Blaylock for RES</i> 11/14/91
15 Verification of Corrective Action: <i>See attached sheet for objective evidence</i>			
16 Corrective Action Completed and Accepted: OAR <i>Neil D. Cox</i> Date <i>1/17/92</i>		17 Closure Approved By: OQA <i>R.C. Spivey</i> <i>1/22/92</i>	

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CORRECTIVE ACTION REQUEST
(continuation sheet)

This CAR recommends 3 actions: 1. Correct discrepancies identified, 2. Investigate to determine if similar discrepancies exist, and 3. Take action to resolve recurrence such as changing AP 5.32Q.

The responses to these 3 recommendations are:

1. The lack of prerequisites in TPP 91-32 and TPP 91-34 is due to there being no TPP prerequisites. This has been confirmed by Forrest Peters and Marvin Saines respectively. A review of the documentation indicates that the procedure was followed, and since there were no prerequisites, there were no discrepancies.
2. Investigation of other TPP's, existing or in process - 90-1, 91-2, 92-01, and the yet to be numbered TPP for UZ-16, indicates that "prerequisite requirements" for the TPP's do not exist or are being considered. Prerequisites for the Job Packages themselves are handled under AP 5.21Q.
3. To better insure that all required activities are identified and accounted for, AP 5.32Q has been revised (Rev 2, ICN 1), approved by QA, and released.

Response Approved:

Jim D. Plase *For I Russ Dyer*
Acting Division Director, RSED

12/4/91
Date

Response Accepted: *

QAR

Date

Response Accepted: *

OQA

Date

* = SEE AMENDED RESPONSE. =

Str dtd 12/11/91 - RSED:G DR-1211
Response hand carried on 12/4/91

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Amended Response

Item 1 of request for amended response:

Revision 3 of QAAP16.1 was used to process this CAR which accounts for the format of the original response meeting the requirements of Rev. 3 rather than Rev. 4. Unless otherwise directed, Rev. 3 will continue to guide the resolution to this CAR, and the details are provided below.

Item 2 of request for amended response:

The following summarizes the situation and the solution.

- A. AP-5.32Q, Rev. 1, ICN 1, Sec. 5, step 10: states for the DD/TFO to provide documentation of prerequisites.
- B. For these test planning packages, there are no prerequisites. Therefore, no documentation was created.
- C. Step 11: This non-existent documentation cannot be "incorporated".
- D. Step 18e: Since there are no prerequisites, there will be no documentation of their completion.
- E. The solution to this possible problem was to demonstrate to QA during the audit that prerequisites were not missed. The DDs of RSED, E&DD, POCD, and QA agreed to document that there are no prerequisites for TPP 91-32 & 34. Each DD signed a memo to the TPP files for each of these TPPs. The memos are dated 10-30-91. This information is confirmed by the TPP FEs in the CAR response.

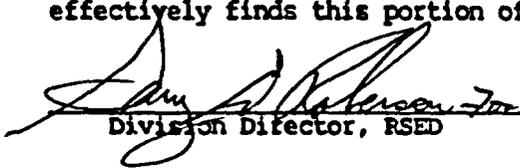
Item 3 of the request for amended response:

It is recognized that as of 10-30-91, Rev. 2 of AP-5.32Q was issued and effective. This was done to satisfy the auditors that future questions as to whether or not prerequisites are identified and documented will not occur.

The original wording about prerequisites caused a duplication of effort since prerequisites are adequately covered by Job Packages, Project/Task Management, and Readiness Reviews.

Therefore, processing of prerequisites has been eliminated from AP-5.32Q which closes this concern.

It is also recognized that the current QA review mentioned in the 19 Dec 91 letter could possibly result in a new concern, even though this letter effectively finds this portion of the response acceptable.


Division Director, RSED

1/3/92
Date

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

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DATE: 1/10/92
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CORRECTIVE ACTION REQUEST (Continuation Page)

Response Accepted: Neil S. Cox 1/10/92
QAR Date

Response Accepted: R. E. Spence 1/14/92
OQA Date

CORRECTIVE ACTION REQUEST

CONTINUATION SHEET

Objective Evidence for Verification of Corrective Actions

A signed memo from the RSED Director stating there were no prerequisites for TPP 91-32 was found in the DOE LRC. The memo was placed in the "IN" box on 1/16/92 and will be a supplement to the test planning package, I-87115.

A signed memo from the RSED Director stating there were no prerequisites for TPP 91-34 was found in the records package segment I-87113 still in progress.

AP-5.32Q, Rev. 2, ICN 1 was examined, and it was found to preclude the reoccurrence of the deficiencies described in this CAR.

Neil D. Cox N.D. Cox, QAR

Date: Jan 17, 1992