



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

JAN 27 1992

Carl P. Gertz, Project Manager, YMP, NV

VERIFICATION OF CORRECTIVE ACTION OF CORRECTIVE ACTION REQUEST (CAR)
 YM-92-012 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-92-012 and determined the results to be unsatisfactory based on the following:

Procedures BTP-SMF-008, BTP-SMF-013, and Administrative Procedure 6.2Q were not revised as committed.

Your letter dated January 16, 1992 (L92-3337), requesting an extension to February 14, 1992, is acceptable. Verification of completion of the required corrective action will be performed after the date provided.

If you have any questions, please contact either Robert B. Constable at 794-7945, Richard L. Maudlin at 794-7290, or John S. Martin at 794-7881.

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-1670

Enclosure:
 CAR YM-92-012

cc w/encl:
 K. R. Hooks, NRC, Washington, DC
 S. W. Zimmerman, NWPO, Carson City, NV
 N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08
 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

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

14CAR NO.: YM-92-012
DATE: 11/8/91
SHEET: 1 OF 2
 QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document AP-6.2Q, Revision 0		2 Related Report No. Audit YMP-91-1-01	
3 Responsible Organization YMP0		4 Discussed With J. Peck, C. Lewis	
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-6.2Q, Revision 0, Management and Operation of Sample Handling Activities at Borehole Sites, Paragraph 2.0, Applicability states in part: "...this procedure does not apply to those samples requiring alternative handling as directed by the Sample Overview Committee (SOC)." AP-6.2Q, Revision 0, Paragraph 5.5.1.4 states in part: "Footage marks will be written directly on the core at one-foot intervals." AP-6.2Q, Revision 0, Paragraph 5.5.4 states in part: "Geological core logging by FO staff will occur in two distinct phases: Recording structural information and recording lithologic information."			
6 Adverse Condition: BTP-SMF-013, Revision 0, "Staging, Packaging, Documenting Neutron-Access Borehole Samples" is not consistent with AP-6.2Q requirements for marking and logging and there is a lack of objective evidence that the SOC directed this alternative method of handling samples. DISCUSSION: A. BTP-SMF-013, Revision 0 does not require footage marks to be physically applied to the core sample at one-foot intervals. Also, in inspecting the neutron access borehole samples for runs 64 and 65, no marks at one foot existed on the lexicon encasement. B. BTP-SMF-013 does not require the logging of structural information and lithologic information related to cores extracted from neutron access boreholes. In addition, no objective evidence was provided to indicate this had been accomplished for neutron access			
7 Recommended Action(s): A. Either revise BTP-SMF-013 to be consistent with the requirements of AP-6.2Q or properly document the alternative approach. If BTP-SMF-013 is revised to incorporate the requirements of AP-6.2Q, identify the plan of action to be taken to bring existing			
8 Initiator <i>R. L. Maudlin</i> R. L. Maudlin <i>R. Maudlin</i>	Date: <u>11/12/91</u>	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: <i>James Blaylock for RES</i> OQA <u>James Blaylock for RES</u> <u>11/14/91</u>
15 Verification of Corrective Action: 			
16 Corrective Action Completed and Accepted: QAR _____ Date _____		17 Closure Approved By: OQA _____	

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CORRECTIVE ACTION REQUEST
(continuation sheet)

6 Adverse Condition (continued)

borehole samples, runs 64 and 65.

- C. Neither the meeting minutes of the SOC nor the 8/7/91 SOC Specimen Removal Request for Study Plan 8.3.1.2.2.1 provide a clear understanding that the SOC was directing an alternative handling method for Neutron-Access Borehole Samples.

7 Recommended Action(s) (continued)

borehole samples into conformance.

- B. Take action to prevent recurrence.

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CORRECTIVE ACTION REQUEST (Continuation Page)

CORRECTIVE ACTION RESPONSE:

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION

A. Extent of Deficiency: Only one neutron access borehole has been completed to date. Thus, the extent of this deficiency is limited to this one borehole.

B. Root Cause: The root cause of this deficiency has been determined to be the inadequacy of AP-6.2Q to specify how the Sample Overview Committee (SOC) is to document that an alternative handling method is required. It was not clear that the SOC directed the alternative handling method to be used.

C. Remedial Action: The following remedial action will be taken to address this deficiency:

(1) Revise BTP-SMF-013, through means of an ICN, to specify that the procedure defines the alternative handling requirements for the neutron access borehole samples and specimens. Chris Lewis will be responsible for this action which will be completed by January 3, 1992.


D. Corrective Action to Prevent Recurrence: In addition to the remedial action discussed previously, the following actions will be taken to prevent recurrence::

(1) Modify the SOC Specimen Removal Request Form, through means of an Interim Change Notice (ICN), to indicate whether special handling procedures are required that will supersede requirements of BTP-SMF-008. Chris Lewis is responsible for this action which will be completed by January 3, 1992.

(2) Modify AP-6.2Q, through means of an ICN, to indicate that the SOC Specimen Removal Request Form will be the means of documenting that special handling procedures are required that will supercede BTP-SMF-008. Chris Lewis is responsible for this action which will be completed by January 3, 1992.

(3) Modify BTP-SMF-008, through means of an ICN, to indicate that the procedure is not applicable if special handling requirements have been directed by the SOC on the Specimen Removal Request Form. Chris Lewis is responsible for this action which will be completed by January 3, 1992.

Note: AP-6.2 is currently under consideration for possible deletion.

Response Approved:  Responsible Manager

12/16/91
Date

See dtl 12/17/91 - YMP:RUB-1323

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CORRECTIVE ACTION REQUEST (Continuation Page)

Response Accepted: Richard Marshall 12-18-91
QAR Date

Response Accepted: J.E. Spence 12/20/91
QQA Date