



**Department of Energy**  
 Office of Civilian Radioactive Waste Management  
 Yucca Mountain Site Characterization Office  
 P.O. Box 30307  
 North Las Vegas, NV 89036-0307

QA: L

JUN 03 1997

D. G. Horton, Director  
 Office of Quality Assurance  
 Attention: Deborah Sult, OQA/QATSS  
 U.S. Department of Energy  
 Yucca Mountain Site Characterization  
 Office, M/S 523  
 P.O. Box 30307  
 North Las Vegas, NV 89036-0307

**RESPONSE TO VERIFICATION OF CORRECTIVE ACTION OF DEFICIENCY REPORT  
 (DR) YM-96-D-099 RESULTING FROM THE OFFICE OF QUALITY ASSURANCE (OQA)  
 AUDIT HQ-ARC-96-003**

In response to the Verification of Remedial Actions, the following issue was determined: All of the exhibits listed in the verification were forms attached to procedures that were effective prior to the creation of Deficiency Report (DR) YM-96-D-099 or the Response to the Deficiency Report. Therefore, the differences between these forms and the effective date of the related procedures does not indicate that the remedial response has not been implemented or is not effective. However, the discovery of these incorrect forms has led to an additional remedial action to review all procedures and update the Automated Forms System by June 30, 1997, with a letter report due to the Director of the Office of Quality Assurance (OQA) that same day.

In response to the Verification of Completion of Action to Preclude Recurrence, it was determined that the procedure is owned and controlled by the OQA. Revision 8 of QAP 5.1 is currently in the comment resolution phase and the preparer has committed to have it ready for implementation on August 4, 1997.

If you have any questions please contact Ruth M. Belanger at (702) 295-6830 or Sandra L. Moore at (702) 295-7162.

Wesley E. Barnes  
 Project Manager

AMAAM:DRW-1654

Enclosure:  
 DR YM-96-D-099

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JUN 03 1997

D. G. Horton

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cc w/encl:

J. O. Thoma, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
Stephanie Barnett, M&O, Las Vegas, NV

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV  
D. G. Sult, OQA/QATSS, Las Vegas, NV  
J. S. Martin, OQA/QATSS, Las Vegas, NV  
R. W. Clark, DOE/OQA, Las Vegas, NV  
D. S. Urban, DOE/YMSCO, Las Vegas, NV  
Records Processing Center =

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

8  Performance Report  
 Deficiency Report  
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:  
Quality Assurance Requirements and Description (QARD), Rev. 5

2 Related Report No.  
HQ-ARC-96-003

3 Responsible Organization:  
Yucca Mountain Site Characterization Office (YMSCO)  
-AMA

4 Discussed With:  
Judith E. Zimmerman/Sandra L. Moore

5 Requirement/Measurement Criteria:  
QARD, Section 5.0, Paragraph 5.2, states "Work shall be performed in accordance with controlled implementing documents."  
  
QARD Section 6.0, Paragraph 6.2.5, states in part: "The distribution and use of documents, including changes and editorial corrections to documents shall include the following:  
A. Documents, either in hard copy or electronic media, used to perform work shall be distributed to, or made available to, and used at, the work location.  
B. Effective dates shall be established for approved implementing documents.  
C. The disposition of obsolete or superseded documents shall be controlled to ensure that they are not used to perform work."

6 Description of Condition:  
Contrary to the above requirements, the control of forms is such that a current revision of a form may not be available in the forms system for use.  
Discussion:  
Procedure Yucca Mountain Site Characterization Project Administrative Procedure YAP-5.20 Q, Revision 1, "Forms Administration," allowed the Technical Publications Management (TPM) organization the latitude to input into the electronically controlled forms system a new or revised form 20 working days after the effective date of the form. In discussions with the TPM it was ascertained that YAP-5.20Q was scheduled for deletion and was during the course of the audit. It was stated that Quality Assurance Procedure QAP 5.1 would be utilized to ensure that the forms system is updated. However, in review of QAP 5.1, it was found that no positive controls exist or are described as to how this is to be accomplished.  
  
(Continued on Page 3)

7 Initiator *J. S. Martin*  
John S. Martin Date 09/11/96

9 Is condition an isolated occurrence?  
 Yes  No  Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)  
1) Investigate the process to determine how only correct and current forms will be posted within the electronic database on the effective date.  
2) It is recommended that a procedure similar to Yucca Mountain Site Characterization Project Line Procedure, YLP-5.2Q, Assistant Manager for Administration, "Maintenance of the OCRWM Program Procedures Database," be developed to ensure that only current forms are available for use.

11 QA Review  
QAR *J. W. [Signature]* Date 9/15/96

12 Response Due Date  
10/31/96

13 Affected Organization QA Manager Issuance Approval: (QAR for PR)  
Printed Name Donald G. Horton Signature *R. W. [Signature]* Date 9/18/96

22 Corrective Actions Verified  
QAR / Date

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

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**PERFORMANCE/DEFICIENCY REPORT RESPONSE**

**14 Remedial Actions:**

The Automated Forms System (AFS) administrator has agreed to work with Technical Publications Management to update the forms system when there is a rush procedure change or implementation. The form implementation will happen concurrently with the procedure effective date. This rush implementation would only be in such cases as CAR resolution or stop work situations.

**15 Extent of Condition: (Not required for PR)**

The current practice of concurrent release of procedures and forms on the same day, albeit a Monday, has precluded the instance of a quality affecting procedure becoming effective before the form is released on the form system.

**16 Root Cause Determination: (Not required for PR)**

Required  Yes  No

The decision to release form only on Mondays was a business practice. In response to this deficiency report, the AFS administrator, located in Vienna, Virginia, has agreed to replicate new forms on all servers for rush, quality affecting procedures. Generally, however, when procedures that are going through regular or systematic changes, have completed their review cycles and have been approved, the preparer, with the help of Technical Publications Management will continue to go through the same two week (minimum) preparation period. This period allows such actions as the determination of training requirements and the automation of forms to occur in an orderly fashion.

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

Required  Yes  No

The Automated Forms System (AFS) administrator has agreed to work with Technical Publications Management to update the forms system when there is a rush procedure change or implementation. The form implementation will happen concurrently with the procedure effective date. This rush implementation would only be in such cases as CAR resolution or stop work situations.

QCRWM QAP 5.1 Q, "Quality Assurance Program Procedures" will be amended with the following phrase added on to the end of Subsection 5.8.g) "on the effective date." With this change the Subsection will read, "Ensure that the Automated Forms System (AFS) is updated with new or revised forms and that cancelled forms are deleted *on the effective date.*" The clarification of this action will preclude recurrence.

10/31/96

Initial  
 Amended

*James J. Adams*  
Date 11/15/96 Phone

QAR

*[Signature]*

N/A DS 123/96

Date 11/15/96

AOQAM

N/A

Date

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The Automated Forms System (AFS) administrator has agreed to work with Technical Publications Management to update the forms system when there is a rush procedure change or implementation. The form implementation will happen concurrently with the procedure effective date. This rush implementation would only be in such cases as CAR resolution or stop work situations. This agreement is in effect as of 10/31/96.

OCRWM QAP 5.1 Q, "Quality Assurance Program Procedures" will be amended with the following phrase added on to the end of Subsection 5.8.g) "on the effective date." With this change the Subsection will read, "Ensure that the Automated Forms System (AFS) is updated with new or revised forms and that cancelled forms are deleted *on the effective date.*" The clarification of this action will preclude recurrence. The Document Action Request (DAR) form will be completed by 01/31/97 thus initiating the change in QAP 5.1Q.

**18 Corrective Action Completion Due Date:**

10/31/96 and 01/31/97

**19 Response by:**

Initial

Amended

SEE LTR. AMAAM: JJA-0728

Date

Phone

**20 Response Accepted**

QAR

Date 1-24-97

**21 Response Accepted (N/A for PR):**

AOQAM

Date 2/4/97

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Description of Condition (continued from page 1).

In addition, in review of the Forms Control System, a note appears which indicates the user is responsible for ensuring that they are using the latest form. The electronic media Forms Control System provides controlled forms for use and was developed to provide access by project users. The current revision of forms should be available for use, as it is for procedures in the Program Procedures Database. It should not be left up to the user to ensure he has the latest form. It is the responsibility of the organization controlling input of the form into the system.

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STATEMENT OF UNSATISFACTORY VERIFICATION FOR DR YM-96-D-099

VERIFICATION OF COMPLETION OF REMEDIAL ACTIONS:

A verification was performed on May 6, 1997 to determine if remedial actions and action to preclude recurrence had been completed in accordance with the January 23, 1997 amended response. A comparison was made between the Revision 28, Exhibit Table of Contents and the Automated Forms System (AFS) to determine that only the most current Exhibit was being posted. The results of the evaluation are listed below:

- Exhibit HLP-2.3Q.1, QARD Applicability Questionnaire, dated 7/1/96 and Exhibit HLP-17.1Q.3, Missing Record Slip Sheet, dated 3/22/96 have not been posted to the AFS.
- Exhibit HLP-17.1Q.1, QA Record Transmittal, dated 3/22/96 has not been posted to the AFS. The AFS shows the 2/25/94 version.
- Exhibit HLP-17.1Q.2, QA Record Package Table of Contents, dated 3/22/96 has not been posted to the AFS. The AFS shows the 2/25/94 version.
- Exhibit QAP 18.2.2, Attendance Record, dated 7/3/95 has not been posted to the AFS. The AFS shows the 1/14/94 version.

VERIFICATION OF COMPLETION OF ACTION TO PRECLUDE RECURRENCE:

- Document Action Request (DAR No. 1995) was initiated on 12/11/96 to update QAP 5.1, Revision 7, ICN 1; however, QAP 5.1, Revision 8 has not been approved and released.

Based on the results of the verification, this Deficiency Report will remain open until all actions have been satisfactorily completed.

Emily S. Reiter      5/8/97  
Emily S. Reiter      Date