



Department of Energy
Yucca Mountain Site Characterization
Project Office
P. O. Box 98608
Las Vegas, NV 89193-8608

WBS 1.2.9.3
QA

DEC 19 1991

Carl P. Gertz, Project Manager, YMP, NV

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-010 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-91-I-01 OF YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT OFFICE

The YMQAD staff has evaluated the response to CAR YM-92-010. The 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 the date. Please send a copy of extension requests to Nita Brogan, Science Applications International Corporation, Las Vegas, Nevada.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Kenneth T. McFall at 794-7280.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:REC-1339

Enclosure:
CAR YM-92-010

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

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J. W. Gilray, NRC, Las Vegas, NV
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08
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PDR WASTE
WM-11 PDR

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

CAR NO.: YM-92-010
DATE: 11/8/91
SHEET: 1 OF 2
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document DOE/RW-0214, Rev. 3, ICN 3.1, QAPD, Sec. 5, Para. 5.1		2 Related Report No. Audit YMF-91-I-01
3 Responsible Organization YMF0	4 Discussed With K. Harbert, R. Murthy	
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:

DOE/RW-0214, Revision 3, ICN 3.1, OCRWM QAPD, Section 5, Paragraph 5.1, "OCRWM Plans, Procedures, Instructions and Drawings" states in part: "Procedures are developed and implemented to ensure that methods to be used for performance of activities affecting quality are prescribed in documented plans, procedures, and instructions. Activities affecting quality are performed in accordance with these documents...."

6 Adverse Condition:

There has been a lack of verbatim compliance with procedures.

DISCUSSION:

Examples for the lack of verbatim compliance are:

- A. YMF AP-3.6Q, Revision 0, "Configuration Management," Paragraph 5.3.2.1.e states that the monthly report of the status of Change Requests (CRs) will contain Configuration Items (CIs) affected by the proposed change.

CI(s) affected by the proposed change were not included in the monthly status report of CRs for the time period of April through September 1991.

7 Recommended Action(s):

Take action to preclude recurrence such as development of a formal training class that covers such topics as verbatim compliance, what to do to request a change to a procedure and when to initiate a CAR.

8 Initiator <i>K. McFall</i> , ATL Date: Kenneth McFall <i>K. T. McFall 11/8/91</i>	9 Severity Level - 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: Date: OQA <i>James B. Langford for RS</i> 11/14/91
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15 Verification of Corrective Action:

16 Corrective Action Completed and Accepted: QAR _____ Date _____	17 Closure Approved By: OQA _____
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ENCLOSURE

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CORRECTIVE ACTION REQUEST
(continuation sheet)

6 Adverse Condition (continued)

- B. YMP AP-3.6Q, Revision 0, Paragraph 5.4.2 states that configuration audits shall be conducted at intervals not to exceed 12 months.

A Total of 15 months elapsed between the March 1990 configuration audit and the June 1991 audit.

- C. YMP AP-5.19Q, Revision 2, "Interface Control" requires interface Memoranda of Understandings (IMOU's) to be sent to the Local Records Center (LRC)

1. after being signed by evaluators (Step 10),
2. after being signed by requester for data acceptance (Step 15), and
3. after being updated and closed (Step 17).

During the audit, it was determined that none of the IMOU's had been sent to the LRC. This was corrected during the audit.

- D. AP-6.17Q, ICN 1, Section 5.12.3 states: "The QRB Administrative Assistant shall transmit a copy of each approved Q-List, Quality Activities List, accompanying PR List, supporting analysis evaluation packages, and subsequent changes to the Local Records Center for filing as a Project record in accordance with approved Project procedures."

QMP-17-01, Revision 3, ICN 1 states that the Record Source shall perform the following steps: Step 11a, "Verify that documents are complete...."

The QRB Administrative Assistant transmitted the record package for QAL-3 (NNA.91.0521.0028/Document Number I-85611) to the LRC. This record package has an Analysis Evaluation Package Cover Sheet that had a blank for the final signature and there was no explanation for the blank. This was corrected during the audit.

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CORRECTIVE ACTION REQUEST (Continuation Page)

Root Cause

A. AP-3.6Q, Revision 0, "Configuration Management"

The requirement for Configuration Item (CI) identification on the monthly Change Request (CR) status report was not complete due to carelessness. The CIs were initially identified on the report, but were removed by mistake during a revision to the report.

B. AP-3.6Q, Revision 0, "Configuration Management"

The requirement for configuration audits to be conducted every 12 months was violated because of incorrect management direction.

C. AP-5.19Q, Revision 2, "Interface Control."

The requirement for sending Interface Memorandum of Understanding (IMOU) to the Local Records Center (LRC) was not performed due to a change in the method of transmitting documents to the LRC. The change was not fully understood by the staff.

D. AP-6.17Q, ICN 1, Revision 0, "Determination of Importance of Items and Activities"

The requirement for verifying that documents are complete was violated due to oversight.

Remedial Action

Memorandums will be issued by the Project Office Project Manager and the T&MSS Project Manager to their respective staffs requiring verbatim compliance with Project documents. Additionally, the memorandums will contain instructions for obtaining management direction when a document is unclear. The responsible individual to ensure this task is accomplished is the Training Manager. Planned completion date for this action is 1/10/92.

Std dtd 12/12/91 - YMP-EQR-1237

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CORRECTIVE ACTION REQUEST (Continuation Page)

The Adverse Conditions identified in CAR YM-92-010 have been corrected in the following manners:

A. AP-3.6Q, Revision 0, "Configuration Management"

The monthly report of the status of CRs has been revised to identify CIs affected by the proposed change. This action has been completed.

B. AP-3.6Q, Revision 0, "Configuration Management"

The procedure will be revised to remove the requirement for configuration audits. The requirement for configuration reviews should be and is located in AP-3.8, Configuration Reviews. A Document Action Request (DAR) will be initiated to remove the requirement from AP-3.6Q. The responsible individual to accomplish this task is Kevin Harbert. Planned completion date for approval of the DAR is 4/15/92

C. AP-5.19Q, Revision 2, "Interface Control."

The employee processing IMOUS has been informed of the new process for transmitting documents to the LRC and is now performing the process correctly. This deficiency was corrected during the audit.

D. AP-6.17Q, ICN 1, Revision 0, "Determination of Importance of Items and Activities"

The adverse condition was corrected during the audit.

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CORRECTIVE ACTION REQUEST (Continuation Page)

Corrective Action

The QA Indoctrination Training will be revised to address verbatim compliance, document revision process, and corrective action process. The responsible individual to perform this task is the Training Manager. Planned completion date for this action is 1/10/92.

Project Office supervisors will attend a briefing to ensure consistent understanding of verbatim compliance, document revision process, and corrective action process requirements. The supervisors will, in turn, brief respective staff members. Attendance rosters for the briefings will provide objective evidence that the briefings were conducted and attended. The attendance rosters will be returned to and maintained by the Training Department. The responsible individual to ensure this task is accomplished is the Training Manager. The planned completion date for this action is 1/31/92.

Response Approved:

[Signature]
For Deputy Project Manager

12/11/91
Date

Response Accepted:

[Signature]
QAR

12/13/91
Date

Response Accepted:

[Signature]
OQA

12/18/91
Date

YMP-063-R0
10/15/91

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT
PROCEDURE COMPLIANCE DOCUMENTATION FORM

I have read, and understood and complied with Document QAAP-16.1, Rev 3 ICN# _____
in accomplishing my responsibilities in this procedure.

Signature Kenneth T. McFall Name (Printed) KENNETH T. McFall

Title QA Representative Date 11/8/91

I have read, and understood and complied with Document QAAP-16.1, Rev 3 ICN# NA
in accomplishing my responsibilities in this procedure. regarding CAR YM-92-010
* Rev 4 of QAAP 16.1 is effective today (11/12/91) however, it was not used for this CAR. The CAR was started using Rev 3.
Signature R.E. Lowe Name (Printed) R.E. Lowe

Title QA ENGR III, AUDIT TEAM LEADER Date 11/12/91

I have read, and understood and complied with Document QAAP 16.1, Rev 3 ICN# _____
in accomplishing my responsibilities in this procedure.

Signature James Blaylock Name (Printed) JAMES BLAYLOCK

Title GEN ENL Date 11/14/91

I have read, and understood and complied with Document QAAP-16.1, Rev 4 ICN# N/A
in accomplishing my responsibilities in this procedure.

Signature Kenneth T. McFall Name (Printed) KENNETH T. McFall

Title QA SCIENTIST (QAAR) Date 12/13/91

I have read, and understood and complied with Document QAAP 16.1, Rev 4 ICN# N/A
in accomplishing my responsibilities in this procedure.

Signature Richard E. Spence Name (Printed) Richard E. Spence

Title Director YMQAD Date 12/18/91

I have read, and understood and complied with Document _____, Rev _____ ICN# _____
in accomplishing my responsibilities in this procedure.

Signature _____ Name (Printed) _____

Title _____ Date _____