



Department of Energy

Washington, DC 20585

QA: L

JUN 16 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 RESPONSE TO DEFICIENCY REPORT (DR) YM-97-D-027
RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT
K/PB-ARP-97-11 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT SYSTEM
MANAGEMENT AND OPERATING CONTRACTOR (CRWMS M&O)

The OQA staff has evaluated the response to DR YM-97-D-027. The response has been
determined to be unacceptable. The response does not include action agreed on in recent
meetings/discussions. Specifically, the response did not commit to accomplish the following
actions and investigations:

- An effective date must be established for current and past Project design documents (i.e.,
drawings specifications, Baseline Change Proposals, Engineering Changes Requests
etc.), included in, or referenced by Kiewit/Parsons Brinckerhoff (Kiewit/PB) Work
Packages.
Investigate Kiewit/PB and CRWMS M&O Document Control processes, including
interfaces between the two. Identify process and procedural revisions necessary to
assure: (1) future design document effective dates will be accurately established and
controlled; and, (2) only one revision level of a design document is available for field use
at any given time.
Assess impact of the conditions identified by this DR on work previously performed. If
there is no impact, document justification. If there was impact, identify actions necessary
to minimize or mitigate impact.

An amended response is required to be submitted to this office within 20 working days of the
date of this letter. Send the original of your response to Deborah Sult, OQA/QATSS,
P.O. Box 30307, Mail Stop 455, North Las Vegas, Nevada 89036-0307. If an extension to the
due date is necessary, it must be requested in writing, with appropriate justification, prior to that
date.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or
Wesley C. Pugmire at (702) 295-5912.

James Blaylock for
Donald G. Horton, Director
Office of Quality Assurance

OQA:JB-1690

Enclosure:
DR YM-97-D-027

Recap: NMS5/HLW

NH33
WM-11
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JUN 16 1997

L. D. Foust

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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
W. C. Pugmire, OQA/QATSS, Las Vegas, NV
D. G. Sult, OQA/QATSS, Las Vegas, NV
R. W. Clark, DOE/OQA, Las Vegas, NV

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

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: DOE/RW-0333P (QARD), Rev. 5, Section 6.0, Document Control
2 Related Report No. Audit Report K/PB-ARP-97-11

3 Responsible Organization: Management & Operations (M&O) Engineering
4 Discussed With: A. Segrest, C. Garrett, W. Glasser, S. Bowlinger, H. Cox

5 Requirement/Measurement Criteria:
Requirement: QARD Para. 6.2.5 B & C require respectively, "The disposition of obsolete or superseded documents shall be controlled to ensure that they are not used to perform work."; and, "A method shall be established to identify the current status of each document that is required to be controlled in accordance with this section."

6 Description of Condition:
Deficiency: Contrary to stated requirements, Project design documents (drawings and specifications) are not controlled adequately to prevent inadvertent use of obsolete or superseded documents.

Supporting Background Information: Presently, the condition exists where two revision levels of the same design document may exist in the field concurrently. This is primarily due to the lack of a management control system addressing and coordinating interface responsibilities from one M&O organization to another.

Design documents are developed and approved by the M&O engineering organizations responsible for the various steps in the design process. Approved documents are forwarded to the M&O document control authority for distribution to users. Personnel identified on distribution lists receive the new or revised document and, follow instructions to replace and destroy or mark superseded/obsolete prior versions of the document with one exception. The Constructor's document control agent receives the new version and initiates the impact evaluation process for the new design (per Spec. Sect. 01400) (continued on page 3)

7 Initiator: W. C. Pugmire Date 03/06/97
9 Is condition an isolated occurrence? Yes No Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)
* Investigate extent of condition and determine impact to programs and/or constructed facilities.
* Determine appropriate actions to mitigate or resolve impacts from past occurrence of identified deficiency.
* Implement remedial actions.
* Determine appropriate actions to preclude recurrence of identified deficiency.
* Implement and monitor actions for effectiveness.

11 QA Review: QAR W. C. Pugmire Date 03/06/97
12 Response Due Date: 20 working days from issuance

13 Affected Organization QA Manager Issuance Approval: (QAR for PR)
Printed Name: DG Horton Signature: James B. Laylock Date: 3/12/97

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:

SEE RESPONSE ON P/DR CONTINUATION PAGE 4

15 Extent of Condition: (Not required for PR)

SEE RESPONSE ON P/DR CONTINUATION PAGE 4

16 Root Cause Determination: (Not required for PR)

Required Yes No

SEE RESPONSE ON P/DR CONTINUATION PAGE 4

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

Required Yes No

SEE RESPONSE ON P/DR CONTINUATION PAGE 5

18 Corrective Action Completion Due Date:

AUGUST 15, 1997

~~JUNE 13, 1997~~ 11/6

19 Response by:

RICHARD D. SMELL

Initial

Amended

Date 5/14/97

Phone 202(295-8601)

20 Response Accepted

5-13-97

21 Response Accepted (N/A for PR):

QAR

Date

AOQAM

Date

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6. Description of Condition (continued):

Supporting Background Information (continued):

Twenty (20) days are set aside for this process by 01400, during which, the document under review is not placed in the Constructor's Work Packages (WPs).

The process described in the preceding paragraph results in occurrences of two versions of the same document existing in the field simultaneously. The new version of the design document exists in controlled manuals or drawing sticks of individuals immediately following document distribution, while the previous version of the design document remains in the Constructor's WPs until such time as impact evaluations, and identified actions from those evaluations, are complete. It is not unusual for two versions of the same document to be available side by side in the same field office. One version on the drawing stick, the other version in the WP. Both appear to be valid for use in construction and/or inspection and test activities.

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NOTE: Because of the complexity of this DR it is expected that the complete resolution to this DR will require an Amended Response(s). This applies to both the definition of the actions required for closure as well as the timing for closure.

BLOCK 14 Remedial Actions

Title III Engineering is currently performing a technical review of K/PB Work Packages as they are transmitted to the RPC. A 25% sample of the total population of 370 Work Packages will be reviewed to investigate if any adverse impacts to previous quality affecting construction and inspection resulted from the identified deficiency. The sample will include representation from all types of "Q" packages including rockbolts, steel sets and other "Q" work, if any.

An effective date, for the record, will be established for all documents found to be in a deficient condition. The establishment of an effective date will be accomplished by insertion of the effective date into the K/PB work packages, if required. This will be accomplished by August 15, 1997.

At the time this DR is closed the DR record package will be cross referenced to the K/PB Work Packages. The M&O will provide a listing of the Work Packages. The QAR will include the cross reference in his Records Package table of contents.

BLOCK 15 Extent of Condition

An investigation of M&O and K/PB document control/distribution processes will be performed and documented. The investigation will be limited to a review of the procedures only, since the surveillance function will reside with OQA to verify the actual performance. The investigation will determine if any interface incompatibilities exist and whether or not the two systems operating in tandem may lead to different revision levels of the same document being available/ authorized for field use. This investigation will be completed before August 15, 1997 to match the date set in BLOCK 14 Remedial Actions above.

BLOCK 16 Root Cause Determination

A Root Cause Determination is not necessary because the DR did not identify the deficiency as significant.

BLOCK 17 Action to Preclude Recurrence

The Action to Preclude Recurrence, if any, will be derived from the findings from BLOCKS 14 and 15. The Action to Preclude Recurrence will be detailed in an Amended Response to this DR.

jjc

May 13, 1997

dry027n.wpd

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