



Department of Energy

Washington, DC 20585

QA: L

JUN 30 1997

W. E. Barnes
Project Manager
ATTN: J. R. Compton
U.S. Department of Energy
Yucca Mountain Site Characterization
Office, M/S 523
P.O. Box 30307
North Las Vegas, NV 89036-0307

VERIFICATION OF CORRECTIVE ACTION OF DEFICIENCY REPORT (DR)
YM-96-D-091, REVISION 1, RESULTING FROM OFFICE OF QUALITY ASSURANCE
(OQA) SURVEILLANCE YMP-SR-96-022 OF SCIENTIFIC PROGRAMS

The OQA staff has verified the corrective action to DR YM-96-D-091, Revision 1, and determined the results to be unsatisfactory. The deficiency was written because Job Packages (JPs) and Test Planning Packages (TPPs) directed that work be conducted under Quality Assurance Grading Reports which have been canceled. The following action was identified in the Remedial Action Section of the Deficiency Report:

"Thus steps for ensuring that all facets of JPs and TPPs are up to date are to convert active JPs/TPPs to Field Work Packages (FWPs), or obsolete JPs/TPPs and require additional work to be done under a FWP. This will ensure that there are no references to obsolete Quality Assurance Grading Reports (QAGRs)."

The implementation of the response is unsatisfactory because the following open TPPs were found to include reference to QAGRs in the section noted:

- 1. Yucca Mountain Project (YMP) TPP-91-34, "Evaluation of Natural Infiltration (Neutron-Access Boreholes) Test Planning Package," Revision 2, Section 7.
2. YMP/TPP-92-15, "Test Planning Package NRG-6 Drilling and Testing," Revision 0, Section 7.
3. YMP/TPP-T-93-09, "Test Planning Package (TPP) T-93-09 Borehole USW SD-12 Drilling and Testing," Revision 2, Section G.
4. YMP/TPP-T-94-01, "T-94-01 Borehole USW SD-9 Drilling and Testing," Revision 3, Item G.

The implementation is also unsatisfactory because all JPs and TPPs have not been converted to FWPs or canceled.

You are requested to provide an amended response indicating what actions will be taken in regards to above TPPs or provide justification for why these have no impact on current field work. The response should also clarify that conversion or cancellation is required only for affected JPs and TPPs, not all of these.

Recip: NMISS/HLUR

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JUN 30 1997

Your amended response, indicating the appropriate corrective action completion date, is required to be submitted to this office within ten 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 you have any questions, please contact either James Blaylock at (702) 794-1420 or Daniel J. Tunney at (702) 794-1353.



Donald G. Horton, Director
Office of Quality Assurance

OQA:JB-1803

Enclosure:
DR YM-96-D-091, Revision 1

cc w/encl:
J. O. Thoma, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
J. A. Hall, M&O, Las Vegas, NV
D. H. Coleman, DOE/YMSCO, Mercury, NV, M/S 763

cc w/o encl:
W. L. Belke, NRC, Las Vegas, NV
D. J. Tunney, 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.**

Performance Report
 Deficiency Report
 NO. YM-96-D-091, Rev. 1
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: YMP/TPP T-93-8, Revision 0; YMP/TPP 92-13, Revision 2; YMP/JP 94-21, March 1995; YMP/JP 95-1, Revision 1	2 Related Report No. YMP-SR-96-022
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3 Responsible Organization: U.S. Department of Energy(DOE)/Assistant Manager for Scientific Programs (AMSP)	4 Discussed With: A. G. Burningham, D. L. Edwards, A. J. Mitchell
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5 Requirement/Measurement Criteria:

a. Test Planning Packages YMP/TPP T-93-8, 8.2, second paragraph, and YMP/TPP 92-13, 8.2, second paragraph, state, "The following Quality Assurance Grading Reports (QAGR) associated with the testing activities have been approved:

PARTICIPANT	QAGR	WBS	SUBJECT
USGS	G1233124	1.2.3.3.1.2.4	Char of YM Perc in the Unsat Zone-ESF"

b. Job Packages YMP/94-21, A.1.b, last paragraph, and YMP/JP 95-1, A.1.b, last paragraph, state, "USGS will operate under the following QAGR:

PARTICIPANT	QAGR	WBS	SUBJECT
USGS	G1233124	1.2.3.3	Char of YM Perc in the Unsat Zone-ESF"

6 Description of Condition:
QAGR G1233124 has been cancelled. Work is being performed in accordance with Job Packages YMP/JP 95-1 and YMP/JP 94-21 which direct that operations be conducted in accordance with a cancelled QAGR.

7 Initiator Daniel J. Tunney <i>Daniel J. Tunney</i> Date 8/26/96	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Action: (Not required for PR)

a. Correct the above listed job packages and test planning packages.

b. Evaluate whether similar deficiencies exist, identify any similar deficiencies, and correct these.

c. Evaluate whether the deficient conditions have an impact on any work performed and if affected, take appropriate corrective measures.

11 QA Review: QAR <i>Daniel J. Tunney</i> Date 8/26/96	12 Response Due Date 20 Working Days from Issuance
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13 Affected Organization QA manager Issuance Approval: (QAR for PR) Printed Name RESPENCE Signature <i>Robert B. Responce</i> Date 8-27-96
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22 Corrective Action Verified QAR _____ Date _____	23 Closure Approved by: (N/A for PR) AOQAM _____ Date _____
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ENCLOSURE P. 1 of 7

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

There are three groups that have prepared Job Packages & Test Planning Packages: Surface-Based Testing, ESF Testing & CMO (Design & Construction). The process of performing work/testing is now done under new procedures (Field Work Package) for Surface-Based Testing (YAP 2.11Q) & ESF Testing (YAP 5.11Q). A new procedure for CMO is being formulated & is expected to be issued within two months.

The Surface-Based Testing group has a target date of October 1, 1996, to close out all but two JPs issued under the old procedure. These two will be converted or completed.

(Continued next page)

15 Extent of Condition: (Not required for PR)

Since work on the project resumed in 1991 of total of 84 JPs have been issued. Of these 48 had been closed out as of August 15, 1996. Several more have been closed out since August 15, 1996. The Surface Based group began noting that obsolete QAGRs were no longer in use in February 1994 due to a revision of their JP process. There are likely no active JPs from Surface Based group that contain a reference to obsolete QAGRs. There is very little Surface-Based work currently under TPPs. The ESF group has approximately ten open JPs/TPPs & there is a reasonable chance that any of their open JPs/TPPs could contain a reference to the obsolete QAGRs. The CMO group has about seven open JPs, & may or may not contain the obsolete reference.

(Continued next page)

16 Root Cause Determination: (Not required for PR)

Not required to remedy the deficiency.

Required Yes No

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

No further actions need be taken to preclude recurrence. The three new procedures that govern work for the various groups are either in place or are being prepared. The new process will preclude reference to obsolete QAGRs.

Required Yes No

18 Corrective Action Completion Due Date:

January 31, 1997

19 Response by:

Initial
 Amended

Don H. Coleman

Date 9/20/96 Phone 702 295-7825

20 Response Accepted

QAR

James A. Jones &

Date

9/23/96

21 Response Accepted (N/A for PR):

AOQAM

[Signature]

Date

10/1/96

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions cont'd:

The ESF Testing group has set an internal target date to close out or convert all JP's/TPPs by October 28, 1996.

The CMO group (Design & Construction group) is on top of their Job Packages & plans to convert as soon as possible after their new procedure is in place (expected November or December 1996). Once their new Field Work Package procedure is in place the old procedures governing JP's and TPPs will be obsolete.

In association with obsoleting the governing documents, the Surface-Based group plans to obsolete all TPPs. Any Surface-Based work will require issuance of one of the new Field Work Packages.

Thus steps for ensuring that all facets of JP'S and TPPs are up to date are to convert active JP'S/TPPs to Field Work Packages, or obsolete JP'S/TPPs and require additional work to be done under a Field Work Package. This will ensure that there are no references to obsolete QAGRs.

A proposed target date for completion of the remedial actions is January 31, 1997, in order to allow time for the CMO & construction group to issue a new YAP governing work & to ensure that TPPs are obsoleted.

15 Extent of Condition and Impact cont'd:

There are 44 open TPPs that could contain outdated references.

The impact of the references to outdated QAGRs is thought to be nil because the relevant information is contained in the PACS system.

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REVISION TO DEFICIENCY REPORT NO. DR YM-96-D-091

Justification:

The Responsible Organization is being changed from U.S. Geological Survey (USGS) to DOE/AMSP since DOE/AMSP is the responsible manager for the job packages.

Daniel Tunney
Daniel Tunney, QAR

8/26/96
Date

Robert B. Constable
Robert B. Constable, AOQAM

8.26.96
Date

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: YMP/TPP T-93-8, Revision 0; YMP/TPP 92-13, Revision 2; YMP/JP 94-21, March 1995; YMP/JP 95-1, Revision 1.	2 Related Report No. YMP-SR-96-022
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3 Responsible Organization: <u>USGS 8/21/96</u> U.S. Geological Survey (USGS) <u>DOE/AMSP USGS</u>	4 Discussed With: A. G. Burningham, D. L. Edwards, A. J. Mitchell
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5 Requirement/Measurement Criteria:

a. Test Planning Packages YMP/TPP T-93-8, 8.2, second paragraph, and YMP/TPP 92-13, 8.2, second paragraph, state, "The following Quality Assurance Grading Reports (QAGR) associated with the testing activities have been approved:

PARTICIPANT	QAGR	WBS	SUBJECT
USGS	G1233124	1.2.3.3.1.2.4	Char of YM Perc in the Unsat Zone -ESF"

b. Job Packages YMP/94-21, A.1.b, last paragraph, and YMP/JP 95-1, A.1.b, last paragraph, state, "USGS will operate under the following QAGR:

PARTICIPANT	QAGR	WBS	SUBJECT
USGS	G1233124	1.2.3.3	Char of YM Perc in the Unsat Zone-ESF"

6 Description of Condition:
QAGR G1233124 has been cancelled. Work is being performed in accordance with Job Packages YMP/JP 95-1 and YMP/JP 94-21 which direct that operations be conducted in accordance with a cancelled Quality Assurance Grading Report.

7 Initiator <u>Daniel J. Tunney</u> Daniel J. Tunney	Date <u>8/12/96</u>	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Action: (Not required for PR)

a. Correct the above listed job packages and test planning packages.

b. Evaluate whether similar deficiencies exist, identify any similar deficiencies, and correct these.

c. Evaluate whether the deficient conditions have an impact on any work performed and if affected, take appropriate corrective measures.

" THIS DR REPLACED BY DR YM-96-D-091 REV. 1. " DBC 8-27-96

11 QA Review: QAR <u>Daniel J. Tunney</u> Date <u>8/12/96</u>	12 Response Due Date 20 Working Days from Issuance
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13 Affected Organization QA manager Issuance Approval: (QAR for PR) Printed Name <u>RESPENCE</u>	Signature <u>Robert R. Burningham</u>	Date <u>8-14-96</u>
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22 Corrective Action Verified QAR <u>N/A</u> Date	23 Closure Approved by: (N/A for PR) AOQAM <u>Robert R. Burningham</u> Date <u>8-27-96</u>
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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

15 Extent of Condition: (Not required for PR)

16 Root Cause Determination: (Not required for PR)

Required

Yes

No

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

Required

Yes

No

18 Corrective Action Completion Due Date:

19 Response by:

Initial

Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

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VERIFICATION OF DR RESPONSE IMPLEMENTATION

Obtained the Master Controlled Document Report, Dated June 10, 1997. This report was used to determine which Job Packages and Test Planning Packages are open.

The following Job Packages were reviewed:

JP 94-05, Rev. 0, JP 94-07, Rev. 0, JP 94-10, Rev. 0, JP 94-16, Rev. 0, JP 94-19 Rev. 0, JP 95-02, Rev. 0, JP 95-3, Rev.0, JP 95-04, Rev 0, JP 95-05, Rev.0, 95-07, Rev. 0, JP 95-08, Rev. 0, JP 95-9, Rev. 0, JP 95-10, Rev. 0, JP 95-11, Rev. 0, JP 95-13, Rev. 0, JP 95-16, Rev. 0, JP 95-17, Rev. 0, JP 95-19, Rev.0, JP 95-21, Rev. 0, JP 95-22, Rev.0, JP 95-23, Rev. 0, JP 95-24, Rev. 0, JP 95-26, Rev. 0, JP 95-31, Rev. 0, JP 95-36, Rev. 0

Note: Job Packages YMP/94-21 and YMP/JP 95-1 have been canceled.

Reviewed Controlled Document Issue Authorization dated 5/29/97 to cancel YMP/TPP-91-5.

Reviewed Controlled Document Issue Authorization dated 6/12/97 to cancel the following Test Planning Packages:
YMP/TPP-92-02, YMP/TPP-92-03, YMP/TPP-92-05, YMP/TPP-95-16, YMP/TPP-95-17, YMP/TPP-T-93-1, YMP/TPP-T-94-03, YMP/TPP-94-12, YMP/TPP-94-13, YMP/TPP-95-5.

Note: Test Planning Packages YMP T-93-8 and YMP 92-13 have been canceled.

Verified that YAP-5.9Q, Revision 0, "Yucca Mountain Site Characterization Project Site Characterization Site Construction Authorization Process" has been issued with an effective date of 3/18/97.

The implementation of the the response is unsatisfactory because the following open Test Planning Packages were found to include reference to QAGRs in the section noted:

- 1 YMP/TPP-91-34, "Evaluation of Natural Infiltration (Neutron-Access Boreholes) Test Planning Package," Rev. 2, Section 7;
2. YMP/TPP-92-15, "Test Planning Package NRG-6 Drilling and Testing," Rev. 0, Section 7;
3. YMP/TPP-T-93-09, "Test Planning Package (TPP) T-93-09 Borehole USW SD-12 Drilling and Testing," Rev. 2, Section G;
4. YMP/TPP-T-94-01, "T-94-01 Borehole USW SD-9 Drilling and Testing," Rev. 3, Item G

The implementation is also unsatisfactory because all Job Packages and Test Planning Packages have not been converted or canceled.

Individual Contacted to Verify Actions: Andrew Burningham

Quality Assurance Representative: Daniel Ramirez Date 6/16/97