



Department of Energy

Washington, DC 20585

QA: L

JUL 10 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

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT  
(DR) YM-97-D-026 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA)  
AUDIT M&O-ARC-97-09 OF THE CIVILIAN RADIOACTIVE WASTE MANAGEMENT  
SYSTEM MANAGEMENT AND OPERATING CONTRACTOR

The OQA staff has verified the corrective action to DR YM-97-D-026 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact James Blaylock at (702) 794-1420.

Donald G. Horton, Director  
Office of Quality Assurance

OQA:JB-1875

Enclosure:  
DR YM-97-D-026

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

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RADIOACTIVE WASTE MANAGEMENT  
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WASHINGTON, D.C.

8  Performance Report  
 Deficiency Report  
NO. YM-97-D-026  
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

AP-16.1Q, R1

2 Related Report No.

M&O-ARC-97-09

3 Responsible Organization:

M&O

4 Discussed With:

R. Morgan, D. Hackbert, R. Justice

5 Requirement/Measurement Criteria:

Paragraph 5.1.2 requires the QAR to use the criteria in Subsection 6.1 to identify the condition as a PR, DR, or a CAR. The criteria for a Performance Condition (PR) in Section 6.1.1 describes a condition that is isolated (i.e., does not require investigative action) and requires only remedial action to achieve desired results.

6 Description of Condition:

Contrary to the requirement above, PRs are used to document conditions that require more than remedial action: LVMO-97-P003 identifies 6 of 40 record packages as deficient; LVMO-97-P006 identifies "augment staff" that was not trained.

7 Initials

J. Blaylock

Date 2/11/97

9 Is condition an isolated occurrence?

Yes  No  Unknown; Must be Yes if PR

10 Recommended Action: (Not required for PR)

Review all PRs for FY96 and FY97 to evaluate if the described condition fits the criteria of Paragraph 6.1.1 Performance Condition. Take appropriate action in evaluating and completing the corrective actions required when the PR is reclassified as a DR.

11 QA Review:

QAR

*James Blaylock*

Date 2/11/97

12 Response Due Date

20 working days from issuance

13 Affected Organization QA Manager Issuance Approval: (QAR for PR)

Printed Name Donald G. Horton

Signature

*Donald G. Horton*

Date 2/20/97

22 Corrective Action Verified

QAR

*James Blaylock*

Date 7/3/97

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

ACSAM

*[Signature]*

Date 7/10/97

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

See PR/DR Continuation Page.

15 Extent of Condition: (Not required for PR)

To be determined during completion of Remedial Action and documented on a PR/DR Continuation Page.

16 Root Cause Determination: (Not required for PR) Required  Yes  No

No further root cause determination is required.

17 Action to Preclude Recurrence: (Not required for PR) Required  Yes  No

All Nevada M&O QA personnel acting as QARs on deficiencies will be made aware of this Deficiency Report and the determining factors for classifying deficiencies by an IOC from the Nevada M&O QA Manager. This IOC will be designated QA:L and specifically reference that it is Action to Preclude Recurrence for this DR.

18 Corrective Action Completion Due Date:

05/30/97

19 Response by: O. J. Gilstrap

Initial

Amended

Date

*O. J. Gilstrap* 3/13/97

Phone 702-295-3967

20 Response Accepted

QAR

*James B. Langford*

Date

3/28/97

21 Response Accepted (N/A for PR):

CAO/AM

Date

*[Signature]* 4/1/97

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PR/DR CONTINUATION PAGE

14. Remedial Actions:

Nevada M&O QA will review all PRs processed by Nevada M&O QA in FY96 and FY97 and evaluate if the described condition was correctly classified based on the criteria of AP-16.1Q Paragraph 6.1.1 Performance Condition. The results of this evaluation will be documented by Nevada M&O QA on a PR/DR Continuation Page.

Based on the results of the evaluation, Nevada M&O QA will either:

1) for any closed PRs that are determined to exceed Paragraph 6.1.1 criteria, and which meet Paragraph 6.1.2 (Deficiency) criteria, perform the following additional investigations and determinations related to the described deficiency:

- a) Extent Of Condition
- b) Action to Preclude Recurrence Determination

For additional investigations and determinations performed, the results will be documented on an IOC and transmitted to the RPC as a supplement to the associated closed PR in accordance with AP-17.1Q, section 5.5

or,

2) for any open PRs that are determined to exceed Paragraph 6.1.1 criteria, and which meet Paragraph 6.1.2 (Deficiency) criteria, initiate new DRs readdressing the deficiency, ensuring that the appropriate investigations and any additional associated corrective actions are performed.

Responsible Individual: O.J.Gilstrap, QA Manager-Nevada

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PR/DR CONTINUATION PAGE

Reviewed 54 Performance Reports : 37 FY-96 and 17 FY 97. Three PRs were superseded to DRs either because additional deficiencies came to light or that the PR was open for an extremely long time. These PRs are: LVMO-96-P003 to LVMO-96-D028, LVMO-97-P003 to LVMO-97-D010 and LVMO-96-P015 to LVMO-96-D049. The M&O generally allows the line organization 20 working days to respond. In some cases, the organizations complete actions well within that time frame. In many cases, because of work constraints, the organizations respond at or close to the 20 day mark and then request another two to four weeks to complete the actions. AP-16.1Q does not put a time restraint on the organization. It is the M&O's contention that even deficiencies that require "remedial action only" and not an investigation, can require an extensive amount of time to resolve. This is especially true when there is a review and approval process or large amount of records to be submitted to the Records Processing Center. The review of the 54 PRs has resulted in the following analysis:

LVMO-96-P001 meets criteria

LVMO-96-P002 meets criteria

LVMO-96-P003 superseded

LVMO-96-P004 meets criteria

LVMO-96-P005 meets criteria

LVMO-96-P006 meets criteria

LVMO-96-P007 meets criteria

LVMO-96-P008 meets criteria

LVMO-96-P009 meets criteria

LVMO-96-P010 meets criteria

LVMO-96-P011 meets criteria

LVMO-96-P012 meets criteria

LVMO-96-P013 meets criteria

LVMO-96-P014 meets criteria

LVMO-96-P015 superseded

LVMO-96-P016 meets criteria

LVMO-96-P017 investigation was conducted prior to initiation of PR. All records involved in this PR were maintained by the Configuration Management group in one location. This PR meets the criteria although there was a lengthy closure time due to the large volume of records to be processed.

LVMO-96-P018 meets criteria

LVMO-96-P019 meets criteria

LVMO-96-P020 meets criteria

LVMO-96-P021 meets criteria

LVMO-96-P022 meets criteria

LVMO-96-P023 meets criteria

LVMO-96-P024 meets criteria

LVMO-96-P025 meets criteria

LVMO-96-P026 meets criteria

LVMO-96-P027 meets criteria

LVMO-96-P028 meets criteria

LVMO-96-P029 meets criteria

LVMO-96-P030 meets criteria

LVMO-96-P031 meets criteria

LVMO-96-P032 meets criteria

LVMO-96-P033 meets criteria

LVMO-96-P034 meets criteria

LVMO-96-P035 meets criteria

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LVMO-96-P036 meets criteria

LVMO-96-P037 meets criteria

LVMO-97-P001 this PR dealt with a finite number of documents left behind in a room vacated by the DOE. While the remedial action indicates that the line organization will investigate to see whether the room contains more records, this is simply rechecking the file cabinets and does not truly define an investigation. This PR meets criteria, although an impact evaluation was performed and documented as part of the remedial action for this PR.

LVMO-97-P002 meets criteria

LVMO-97-P003 superseded

LVMO-97-P004 meets criteria

LVMO-97-P005 meets criteria

LVMO-97-P006 the originally issued PR did not take into account QAP-2-2 in regards to the qualifications of Pierce Leahy Archives personnel. This was an oversight and inappropriately identified in the PR as "additional investigation". QAP-2-2 functions are normally done as part of the qualification of M&O personnel. The original PR cited only QAP-2-1. The PR was revised to include Verification of Work Experience and Education. There are only three individuals at PLA who work on YMP documents. This PR meets criteria, although it identified additional investigation and was revised.

LVMO-97-P007 meets criteria

LVMO-97-P008 meets criteria

LVMO-97-P009 meets criteria

LVMO-97-P010 meets criteria ,although investigation was performed as part of remedial action and is so documented on the PR.

LVMO-97-P011 meets criteria

LVMO-97-P012 meets criteria

LVMO-97-P013 meets criteria

LVMO-97-P014 meets criteria

LVMO-97-P015 meets criteria

LVMO-97-P016 meets criteria

LVMO-97-P017 meets criteria

**Interoffice Correspondence**  
**Civilian Radioactive Waste Management System**  
**Management & Operating Contractor**



TRW Environmental  
Safety Systems, Inc.

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QA: L

**Subject**  
Action to Preclude  
Recurrence for Deficiency  
Report (DR) YM-97-D026

**Date**  
April 16, 1997  
LV.QA.GSA.04/97-077

**From**  
O.J. Gilstrap

**To**  
M&O QA personnel

**cc**  
See Below

**Location/Phone**  
423/715  
702-295-3967

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All personnel acting as Quality Assurance Representatives (QARs) are to be aware of the criteria for classifying a deficiency as either Performance Report (PR) or Deficiency Report (DR). This is identified in AP-16.1Q, Rev.1, ICN 0, Section 6.1. QARs will refer to this section each time a deficiency is classified.

cc:  
chron file

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VERIFICATION OF CORRECTIVE ACTION FOR DEFICIENCY REPORT (DR) YM-97-D-026

Surveillance SR-97-035 was performed by Ed Opelski to verify that the corrective actions identified in DR YM-97-D-026 had been completed. Based on the results of SR-97-035, the DR is closed.

James Blaylock

James Blaylock, QAR

7/3/97

Date