



# Department of Energy

Washington, DC 20585

QA: L

AUG 18 1997

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## EVALUATION OF AMENDED RESPONSE AND VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT (DR) YM-96-D-091 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) SURVEILLANCE YMP-SR-96-022 OF SCIENTIFIC PROGRAMS

The OQA staff has evaluated the amended response and verified the corrective action for DR YM-96-D-091 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either James Blaylock at (702) 794-1420 and Daniel J. Tunney (702) 794-1353.

*R.W. Cep*  
F. Donald G. Horton, Director  
Office of Quality Assurance

OQA:JB-2104

Enclosure:  
DR YM-96-D-091

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

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PDR WASTE  
WM-11 PDR

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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

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

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

Date

8/26/96

9 Is condition an isolated occurrence?

☐ Yes ☒ No ☐ Unknown; Must be Yes if PR

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

Daniel J. Tunney

Date

8/26/96

12 Response Due Date

20 Working Days from Issuance

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

Printed Name

RESPENCE

Signature

Robert B. Cantabio

Date 8-27-96

22 Corrective Action Verified

QAR

DJ Tunney

Date

7/30/97

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

AOQAM

Robert B. Cantabio

Date 8/2/97

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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)

Required

☐ Yes

☒ No

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.

18 Corrective Action Completion Due Date:

January 31, 1997

19 Response by:

☒ Initial

☐ Amended

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

Date

10/11/96

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**PERFORMANCE/DEFICIENCY REPORT RESPONSE**

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**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.

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**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

3 Responsible Organization:

U.S. Geological Survey (USGS) *DOE/AMSP USGS*

4 Discussed With:

A. G. Burningham, D. L. Edwards, A. J. Mitchell

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:

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- 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

*Cancelled*  
Daniel J. Tunney

Date *8/12/96*

9 Is condition an isolated occurrence?

☐ Yes ☒ No ☐ Unknown; Must be Yes if PR

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. " *DEC 8 27 96*

11 QA Review:

QAR *Daniel J. Tunney* Date *8/12/96*

12 Response Due Date

20 Working Days from Issuance

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

Printed Name *RESPENCE*

Signature *Robert M. Burningham*

Date *8-14-96*

22 Corrective Action Verified

QAR *N/A* Date

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

AOQAM *Robert M. Burningham*

Date *8 27 96*

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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 Repräsentative: Daniel A. Timm Date 6/16/97

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

The subject planning and implementing documents identified in block 5 have been cancelled and replaced with Field Work Packages that do not contain references to superseded QAGRs.

15 Extent of Condition: (Not required for PR)

A review of controlled field activation documents (i.e. Job Packages) conducted in June 1997 confirmed that all Job Packages with references to QAGRs have been cancelled or revised to delete the outdated references. Test Planning Packages are not implementing documents and therefore are not impacted by this DR.

16 Root Cause Determination: (Not required for PR)

Required: ☐ Yes ☒ No

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

Required: ☐ Yes ☒ No

YAP-5.7Q and YAP-5.9Q that now govern field implementing documents no longer require references to QAGRs. No additional action to preclude recurrence is required.

18 Corrective Action Completion Due Date:

07/21/97

19 Response by: Drew Coleman

*Drew Coleman*  
Date 07/11/97

Phone 5-7825

20 Response Accepted

QAR *D. J. Turner*

Date 7/30/97

21 Response Accepted (N/A for PR)

DOQA *R. W. C.* Date 8/12/97



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VERIFICATION OF AMENDED DR RESPONSE IMPLEMENTATION

Verified that YAP-5.7Q, Revision 1 and YAP-5.9Q, Revision 0 do not require references to QAGRs. Objective evidence verified for this deficiency is also documented on the PR/DR continuation page dated June 16, 1997. The QAR concurs with the amended response which indicates that Test Planning Packages are not implementing documents and are not impacted by this DR. The amended response does not require the cancelation of Test Planning Packages with references to Quality Assurance Grading Packages. Based on the amended response dated July 11, 1997, and the objective evidence reviewed this verification is acceptable.

Quality Assurance Representative DJ. Tully Date 7/30/97