



Department of Energy
 Office of Civilian Radioactive Waste Management
 Yucca Mountain Site Characterization Office
 P.O. Box 30307
 North Las Vegas, NV 89036-0307

AUG 27 1997

D. G. Horton, Director
 Office of Quality Assurance
 U.S. Department of Energy
 Office of Civilian Radioactive
 Waste Management
 P.O. Box 30307
 North Las Vegas, NV 89036-0307

AMENDED RESPONSE TO DEFICIENCY REPORT (DR) YM-96-D-095

Reference: Ltr, Horton to Barnes, dtd 03/11/97

Enclosed is the amended response to subject DR. If you have any questions, please contact Sandra L. Rouse at (702) 794-5514.

Jeri J. Adams
 Jeri J. Adams

Assistant Manager for Administration
 and Asset Management

AMAAM:SLR-2218

Enclosure:
 Amended Response

cc w/encl:

- J. O. Thoma, NRC, Washington, DC
- S. W. Zimmerman, NWPO, Carson City, NV
- P. A. Pytel, M&O, Las Vegas, NV
- J. R. Compton, DOE/YMSCO, Las Vegas, NV
- Records Processing Center

1/1

NH 33
 WM-11
 102. #

030095

Recip: NMSS/pahl



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

8 Performance Report
 Deficiency Report

NO. YM-96-D-095

PAGE 1 OF 7
QA: L

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:
YMSCO Procedure YLP-2.1Q, Rev. 1, ICN 2 & QARD, Rev. 5

2 Related Report No.
HQ-ARC-96-003

3 Responsible Organization:
YUCCA Mountain Site Characterization Office (YMSCO)
- AMA

4 Discussed With:
Dick Spence/Sandra L. Rouse

5 Requirement/Measurement Criteria:
QARD Section 2.2.12B, D and F

"...Establish description for those positions that include work subject to the QARD."

"...Establish minimum education and experience requirements for each position."

"...Ensure minimum education and experience are verified or, when minimum education and experience cannot be specifically verified, provide a statement of justification for the personnel assignment."

(CONTINUED ON PAGE 3)

6 Description of Condition:

Contrary to the requirements in block 5 above:

1) Personnel Qualification Records Packages of those Federal Employees referenced on Attachment 1 do not contain one or more of the following:

- a. Position Qualification Statement (PQS)
- b. Definition of Education Requirements
- c. Definition of Experience Requirements
- d. Adequate documentation of verification of education and experience.*
- e. Justification Statement for Education or Experience which could not be verified (as applicable).

*Note: Letters documenting that verification had been performed reference DOE Order 3731.1, which does not describe a process of verification of education and experience.

2) YLP-2.1Q does not describe (or refer to) a process for verification of minimum education and experience.

7 Initiator

Charles E. Betts

Date 09/11/96

8 Is condition an isolated occurrence?

Yes No Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)

1) Ensure that each open Personnel Qualifications Records Package for Federal OCRWM YMSCO Personnel contain the following information:

- a. Position Qualification Statement (PQS)
- b. Definition of Education Requirements
- c. Definition of Experience Requirements
- d. Adequate documentation of verification of education and experience.
- e. Justification Statement for Education or Experience which could not be verified (as applicable)

(CONTINUED ON PAGE 3)

11 QA Review

QAR

Date 9/15/96

12 Response Due Date

10/31/96

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

Printed Name Donald G. Horton

Signature

Date 9/18/96

22 Corrective Actions Verified

QAR

Date

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

AQQAM

Date

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

PR/DR NO. YM-96-D-095
PAGE 2 OF 7
QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

It was determined that the notes in Attachment 1 of the DR were inadvertently switched. Note 2 pertains to the definition of education and experience, and Note 1 pertains to the verification thereof. Proceeding on this basis, the following remedial action response was developed:

1. For Personnel Qualification Records Packages of those Federal referenced in Attachment, the following response is provided:
 - a. Position Qualification Statements (PQS) - The PQS identified as missing in Attachment 1 of the DR (for Richard L. Craun) will be provided for the training/qualification records. (See PR/DR Continuation Page for additional response)

15 Extent of Condition: (Not required for PR)

All Position Qualification Statements for Federal Employees have been reviewed to assure the information was relevant to the latest position held and to assure verification was performed. No additional discrepancies were noted, however, for any Federal Employee not currently required to perform quality-affecting work, the PQS was revised to reflect the current status.

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

No root cause determination is necessary. The QARD is currently being revised to clarify the requirements and Administrative Procedures are being developed to ensure adequacy and consistency of implementation.

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

No further action to preclude recurrence was determined to be necessary. The revision of the QARD and development of the Administrative Procedures as stated in Block 16 will serve to avoid future problems in the areas of personnel qualification and training.

18 Corrective Action Completion Due Date:

19 Response by:

Date

Phone

20 Response Accepted

21 Response Accepted (N/A for PR)

QAR

Date

DOQA

Date

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

8 Performance Report
 Deficiency Report

NO. YM-96-D-095

PAGE 3 OF 7

QA: L

PR/DR CONTINUATION PAGE

5 REQUIREMENT (CON'T)

QARD Section 17.2.1.A.7

"Documents that meet the following requirements shall be classified as lifetime QA records...Personnel training and qualification documents for individuals executing QA program requirements."

QARD Section 5.2 and 5.2.2.C

"Work shall be performed in accordance with controlled implementing documents...implementing documents shall include...a sequential description of the work to be performed..."

YLP-2.1Q Section 7.1

"Each of the following shall be designated as a lifetime QA record.

- a) Position Description
- b) Position Qualification Statement....,
- d) Documentation Attesting to Completion of Verification"

10 RECOMMENDED ACTIONS (CON'T)

- 2) To clearly document the Verification of Education and Experience Requirements the preferred and/or alternate methods for Verification of Education and Experience as delineated in the QARD Lessons Learned/Program Clarification NO. 93-001 (See Attachment 2) should be adhered to.
- 3) Review Position Qualification Statement to determine if information is relevant to latest position held and that evidence of verification was performed. Letter of Justification as minimum will be required for all position changes.
- 4) Ensure that YLP-2.1Q-YMSCO is revised to provide clear and concise direction for conducting Personnel Qualification including all those activities which have been detailed in recommendations (1) through (3) above. Any differences in processing Federal vs. Contractor Personnel Qualification activities should be clearly delineated.
- 5) Ensure that all supervisory personnel receive training to YLP-2.1Q-YMSCO, "YUCCA MOUNTAIN SITE CHARACTERIZATION OFFICE QUALIFICATION AND TRAINING".
- 6) Ensure those individuals responsible for the implementation and conduct of Personnel Qualifications have been properly trained to YLP-2.1Q-YMSCO.
- 7) Ensure adequate objective evidence of the aforementioned requirements are included in the YMSCO Records System.

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

NO. YM-96-D-095

PAGE 4 OF 7

QA: L

PR/DR CONTINUATION PAGE

Block 14. Remedial Actions (continued):

- b. Definition of Education Requirements - For those individuals listed in Attachment 1 that had a PQS in place, the education requirements are defined by the Federal Qualification Standards Handbook for General Schedule Positions.
 - c. Definition of Experience Requirements - For those individuals listed in Attachment 1 that had a PQS in place, the experience requirements are defined by the Qualification Standards Handbook for General Schedule Positions.
 - d. The DOE Human Resources responsibilities and processes for verification of education and experience are covered specifically by the Qualification Standards Handbook for General Schedule Positions. It was not the intent of the letters from Human Resources to document the process for performing this verification but to state that it had been performed using the required DOE Human Resources policies. Any letters for verification of education and experience which did not reference the appropriate documents for performing this action were revised to include the correct references. Revision of the letter for verification of education and experience now references the Qualification Standards Handbook for General Schedule Positions including identification of the position to which the person is assigned and a statement that the employee meets the qualification requirements for the position specified. Note that this form letter was reviewed by OQA and preliminary concurrence was indicated.
 - e. If necessary, a Justification Statement will be provided for education and experience which could not be verified.
2. The action taken to verify education and experience is included in YLP-2.1Q-YMSCO. This action is considered a step in the process of qualifying personnel and not a process in itself (refer to the QARD which defines "verification" as, "the act of reviewing, inspecting, testing, checking...").
 3. All Position Qualification Statements for Federal Employees were reviewed reviewed to assure the information was relevant to the latest position held and to assure that verification was performed.
 4. YLP-2.1Q-YMSCO will be replaced by AP-2.1Q and AP-2.2Q as soon as comments can be resolved.
 5. All supervisory personnel have been trained to YLP-2.1Q-YMSCO.
 6. Human Resources personnel who perform verification of education and experience will not be trained to YLP-2.1Q-YMSCO. Note that it is the responsibility of the supervisor to ensure that assigned personnel are properly qualified and trained.
 7. Objective evidence of the verification of education and experience is maintained in Human Resources records, as required by Human Resources policies, directives, and procedures. A statement to that effect has been included in the form letter provided by Human Resources.

Needs to be checked.

ATTACHMENT 1

EMPLOYEE	POS IN PLACE	EDUCATION REQUIREMENTS DEFINED	EXPERIENCE REQUIREMENTS DEFINED	EDUCATION VERIFIED	EXPERIENCE VERIFIED	JUSTIFICATION FOR EDUCATION	JUSTIFICATION FOR EXPERIENCE
MARK C. TYNAN	YES	NO NOTE 1	NO NOTE 1	X-118 SEE NOTE 2	X-118 SEE NOTE 2	N/A	N/A
RICHARD CRAUN	NO	NO	NO	SEE NOTE 2	SEE NOTE 2	N/A	N/A
JOHN G. GANDI	YES	NO NOTE 1	NO NOTE 1	SEE NOTE 2	SEE NOTE 2	N/A	N/A
MICHAEL VALENTINE	YES	NO	NO	YES	YES	N/A	N/A

NOTE 1: Memo in personnel file that states, "DOE Education and Employment Records Verification of Education and Employment have been completed for the DOE Employee. These verifications have been completed in accordance with DOE Order 3731.1, Suitability, Position Sensitivity and Related Personnel Matters."

NOTE 2: Memo in personnel file that states, "Position descriptions for federal employees are written and processed in accordance with procedures established by the OPM. Minimum education and experience requirements are documented in the OPM Handbook X-118, Qualification Standards for Position Under the General Schedule."

N/A: Not Applicable

**CIVILIAN RADIOACTIVE WASTE MANAGEMENT (CRWM) PROGRAM
OFFICE OF QUALITY ASSURANCE (OQA)
LESSONS LEARNED/PROGRAM CLARIFICATION NO. 93-001**

SUBJECT

QA Program Element 2.0, Quality Assurance Program, specifically: Verification of Minimum Education and Experience.

CONDITION SUMMARY

Some CRWM affected organizations are unaware of the different methodologies of satisfying the requirement for Verification of Minimum Education and Experience.

RESOLUTION

Education Verification

Preferred Method: On company letterhead, request written verification of the highest level of education the employee (or potential employee) had earned from the school Office of the Registrar. Request verification of degree(s) awarded, (or transcript) education major, and dates attended.

Alternate Method: Telephone the school's Office of the Registrar, identify your company and yourself, and request verification of the highest level of education the employee (or potential employee) had earned. Record the following information:

- Date and time
- Telephone number
- Registrar staff member's name providing information
- Degree(s) awarded
- Education major
- Dates attended
- (units toward degree, if a degree was not awarded)
- The signature and date of the requestor

Note: An employee furnished copy of a diploma or transcript is not satisfactory for use as objective evidence in education verification.

Experience Verification

Preferred Method: On company letterhead, request written verification of work experience from the employee's previous employer(s) for the dates and position descriptions cited on the employee's resume.

**CIVILIAN RADIOACTIVE WASTE MANAGEMENT (C/RW) PROGRAM OFFICE OF
QUALITY ASSURANCE (OQA)**

LESSONS LEARNED/PROGRAM CLARIFICATION NO. 93-001

(continued)

Alternate Method: Telephone the employee's previous company personnel department or previous department manager. Identify your company and yourself and request verification of the employee's work experience. Record the following information:

- Date and time
- Company name, address and telephone number, personnel staff member name or previous department staff member providing the information.
- Dates employed
- Position description
- The signature and date of the requestor.

In the event that the employee's previous company is out of business or personnel records are no longer available, due to time duration since being employed by the company, it is permissible to contact person(s) that have personal knowledge of the employee's work history for a specified time frame. Record the following information:

- Date and time
- Persons name, address and telephone number providing the information
- Confirmation of the dates provided on employee's resume. Record actual time frame being evaluated
- Position description title, or job title
- The signature and date of the requestor.

Note: Objective evidence accumulated or generated for the purpose of education and experience verification is subject to surveillance and audit.

BASIS FOR RESOLUTION

DOE/RW/0333P, Rev.#0 QARD, QA Element 2.0, Quality Assurance Program. Paragraph 2.2.11 Personnel Selection, Indoctrination, Training and Qualification. Item F. states "Ensure minimum education and experience are verified or, when minimum education and experience cannot be specifically verified, provide a statement and justification for the personnel assignment."

 5/11/93

Donald G. Honon

Date

Director

Office of Quality Assurance