



Department of Energy

Washington, DC 20585

QA: L

AUG 28 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

ISSUANCE OF DEFICIENCY REPORT (DR) YM-97-D-050 RESULTING FROM
OFFICE OF QUALITY ASSURANCE (OQA) SURVEILLANCE K/PB-SR-97-024

Enclosed is DR YM-97-D-050 generated as a result of OQA Surveillance
K/PB-SR 97-024.

Please identify the corrective action to be taken and implemented to correct the deficiency.
Send the original of your response to Deborah Sult, OQA/QATSS, P.O. Box 30307,
Mail Stop 455, North Las Vegas, Nevada 89036-0307. Response to the DR is due
20 working days from the date of this letter. Any extension to the due date must be
requested in writing, with appropriate justification, prior to the due date.

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

Donald G. Horton, Director
Office of Quality Assurance

OQA:JB-2192

Enclosure:
DR YM-97-D-050

- 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
- H. R. Cox, 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

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

PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document: Kiewit/Parsons Brinkerhoff (K/PB), MCP-17.0, Revision 12, Records Management
2 Related Report No.: Surveillance K/PB-SR-97-024

3 Responsible Organization: Kiewit/PB
4 Discussed With: C. A. Rixford, K. C. Krank

5 Requirement/Measurement Criteria:
 K/PB MCP 17.0, Revision 12, Records Management, Paragraph 3.2.5 requires, "Responsible Record Sources (RSs) shall...A) Verify that records/records packages are legible...C) Ensure that no information ... has been obliterated...D) Verify records/records packages are complete...I) Ensure information contained on records/records packages is accurate....".
 Paragraph 3.6.1 requires, "Corrections shall be made by changing the original record....This can only be performed by the individual within the originating organization who is authorized to make corrections....".
 Paragraph 3.6.2 requires, "Make corrections by drawing a single line, using dark ink, through the incorrect information and placing the correct information in close proximity and initialing/stamping and dating the correction. Insertions, transcriptions, and write overs (enhancements) are considered corrections."
 (continued on page 3)

6 Description of Condition:
 Contrary to requirements, records/record packages were observed with administrative/qualitative discrepancies. The following examples are provided for illustration:

- Changes/Corrections to Q records, by entities other than the originating organization. Organizations/individuals signatory to initial documents were not advised of, or signatory to corrections. Refer to WP 2.23.2Y Inserts B-13, B-14, B-17, B-32, B-33, and B-36. (Requirement violated - reference K/PB MCP, Paragraph 3.6.1 and 3.6.3, for unauthorized changes)
- Quality Control (QC) records and construction records documenting the same work (i.e., total count of steel sets installed during shifts) do not correlate. Refer to WP 2.23.2Y Inserts B-13 & 14, and WP 2.20.3Y Inserts B-27 & 151*. *(Note: WP 2.20.3Y Insert B-151 documents 6 steel sets installed on grave shift 4/25/96, there are no corresponding construction installation or QC inspection/monitoring reports in WP 2.23.2Y) (Requirement violated - reference K/PB MCP Paragraph 3.2.5, for accuracy)

(continued on page 3)

7 Initiator: W. C. Pugmire *WCP* Date 08/14/97
9 Is condition an isolated occurrence?
 Yes No Unknown; Must be Yes if PR

10 Recommended Actions: (Not required for PR)
Remedial Action - Describe those actions necessary to correct those deficiencies described above.
Extent of Condition - Evaluate the identified conditions and determine the need to perform further investigation of completed record packages to determine like conditions.
Corrective Action to Preclude Recurrence - Further develop and proceduralize the record review process to assist in assuring accuracy of records/record packages.

11 QA Review: QAR W. C. Pugmire *WCP* Date 08/14/97
12 Response Due Date: Twenty (20) Working Days After Issuance

13 Director, OQA Issuance Approval: (QAR for PR)
 Printed Name Donald G. Horton Signature *R.W. Coe* Date 8/25/97

22 Corrective Actions Verified: QAR Date
23 Closure Approved by: (N/A for PR) DOQA Date

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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: Date Phone

20 Response Accepted QAR Date

21 Response Accepted (N/A for PR) DOQA Date

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PR/DR CONTINUATION PAGE

5 Requirement/Measurement Criteria: (continued)

K/PB MCP-17.0, Revision 12, Paragraph 3.6.3 requires, "If a change to a document is made which has been concurred/approved/reviewed by another organization/group, the new change shall be corrected in accordance with paragraph 3.6.2 above and concurrence/approval/review of the new change by the organization/group shall be obtained."

6 Description of Condition: (continued)

3. Improper corrections/changes (i.e., typewriter/computer generated "line-outs" and corrections without initials/date) Refer to WP 2.23.2Y Insert A-1, B-1, and C-1. (Requirement violated K/PB MCP-17.0, Paragraph 3.6.2, for initialing and dating corrections)

4. Work Package inventory sheets and records have information added to previously "N/A"ed blocks which were not initialed and dated. Refer to WP 2.23.2Y Inserts B-1 and C-1. (Requirement violated - K/PB MCP-17.0, Paragraph 3.6.2, for improper corrections)

5. Information entered on Work Package Inventories and Authorizations is not consistent (i.e., "date" block competed with revision level in some cases, effective/implemented date in other cases). Refer to WP 2.23.2Y Insert A-3 and 10. (Requirements violated - K/PB MCP-17.0, Para. 3.2.5, for accurate information)