



Department of Energy

Washington, DC 20585 9/2/97

OA: L

AUG 12 1997

NOTE:

The letter attached (OQA:JB-2068, Horton to Boyd, dated August 12, 1997) replaces the one previously sent on 8/12/97, which was mailed without a signed copy of Enclosure 1. Please toss your first copy of the letter and keep this one. Sorry for the inconvenience.

Mirna (702-794-5536)

VERIFICATION OF CORRECTIVE ACTIONS AND CLOSURE OF DEFICIENCY REPORT (DR) YM-97-D-030 AND PERFORMANCE REPORT (PR) YM-97-P-009 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT EM-ARC-97-05 OF THE NATIONAL SPENT NUCLEAR FUEL PROGRAM

The OQA staff has verified the corrective actions to DR YM-97-D-030 and PR YM-97-P-009 and determined the results to be satisfactory. As a result, these documents are considered closed.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Charles C. Warren at (702) 734-0858.

Donald G. Horton, Director
Office of Quality Assurance

OQA:JB-2068

Enclosures:

1. DR YM-97-D-030
2. PR YM-97-P-009

cc w/encls:

S. E. Gomberg, DOE/HQ (RW-51) FORS
Jeffrey Williams, DOE/HQ (RW-51) FORS
J. O. Thoma, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV

cc w/o encls:

W. L. Belke, NRC, Las Vegas, NV
C. C. Warren, 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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RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

ORIGINAL
THIS IS A RED STAMP:
8 ☐ Performance Report
☒ Deficiency Report

NO. YM-97-D-030

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

Program Management Procedures - NSNF

2 Related Report No.

EM-ARC-97-05

3 Responsible Organization:

EM-67 NSNF

4 Discussed With:

Tom Lewallen, Vance Berg, Greg Law

5 Requirement/Measurement Criteria:

PMP 5.02, Section 4.e.1(c) states, "After resolution of comments and acceptance of the M&O contractor's QARD requirements matrix, [the QAPM] schedules and conducts an on-site implementation audit of the M&O's QA program in accordance with PMP 18.01 and PMP 18.02."

6 Description of Condition:

In violation of the sequence established in PMP 5.02, Section 4.e.1(c), the on-site implementation audit of the Savannah River Site (SRS) was conducted before complete resolution of comments and acceptance of the SRS QARD requirements matrix.

7 Initiator

J. E. Clark

Date 4/4/97

9 Is condition an isolated occurrence?

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

10 Recommended Action: (Not required for PR)

- o Document the resolution of comments and the acceptance of the SRS QARD requirements matrix.
- o Evaluate the impact of conducting the SRS implementation audit before acceptance of the QARD requirements matrix.
- o Determine if the QA program acceptance process needs greater sequencing flexibility and revise PMP 5.02 as appropriate.

11 QA Review:

QAR

Date 4/8/97

12 Response Due Date

20 working days from issuance

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

Printed Name D. G. Horton

Signature

Date 4/15/97

22 Corrective Action Verified

QAR

Date 7/30/97

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

Date 8/20/97

Exhibit AP-16 Q.1

Rev. 07/15/96

ENCLOSURE 1

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PR/DR NO. YM-97-D-030

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

See Attachment.

15 Extent of Condition: (Not required for PR)

See Attachment.

16 Root Cause Determination: (Not required for PR)

Required ☐ Yes ☒ No

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

Required ☒ Yes ☐ No

See Attachment.

18 Corrective Action Completion Due Date:

June 30, 1997

19 Response by: *A. D. Anderson for*
Robert D. Davis, NSNF QAPM

☒ Initial

☐ Amended

Date 5/14/97 Phone (208) 526-4246

20 Response Accepted

QAR

J. E. Clark

Date 5/16/97

21 Response Accepted (N/A for PR):

Robert D. Davis

Date 5/22/97

PERFORMANCE/DEFICIENCY REPORT - No. YM-97-D-030, (Attachment)

YM-97-D-030, Block 14 - Remedial Actions:

Review the documentation associated with the receipt, review, and resolution of comments for the SRS QARD requirements matrix. Assure that deficiencies noted were identified and provided to SRS management for resolution and that a schedule for completion of the planned corrective actions was provided. Verify acceptance of the proposed corrective actions and determine if corrective actions have been completed and/or the current schedule for completion and acceptance of the SRS requirements matrix. Establish the events in chronological order, including the original schedule for review of the Matrix and for performing the subsequent implementation audit. Determine the ramifications of performing the SRS implementation audit and acceptance of the SRS program prior to final acceptance of the SRS QARD requirements matrix. Review PMP 5.02, "Program Execution Documents" and determine the need for revising the sequence or chain of events needed to allow proper acceptance of both the documented QA programs and the subsequent verification of implementation of those programs.

YM-97-D-030, Block 15 - Extent of Condition:

In June of 1996, the NSNF program initiated a request for DOE-SR to submit a QARD requirements matrix identifying the procedures that the M&O Contractor would use implement the applicable requirements of DOE/RW-0333P relative to their SNF activities. In July of 1996, DOE-SR submitted the WSRS matrix and the NSNF program initiated a review. The submitted matrix and implementing procedures addressed Revision 4 of the QARD and WSRS was in the process of updating the matrix and procedures to meet the requirements of Revision 5 and re-submit it prior to the implementation audit, which was tentatively scheduled for November 1996. In November 1996, the NSNF program scheduled a scoping visit to SRS to discuss the revised matrix and conduct a preliminary informal review of the SRS QA program. This visit was conducted December 3 through 5, 1996. The NSNF program received the revised matrix, completed the review, documented the results on Review Comment Records (RCR) forms, and transmitted the RCR forms to DOE-SR on December 17, 1996. On December 20, 1996, the NSNF program scheduled the DOE-SR implementation audit for the week of February 9, 1997. At this time the RCR forms with the responses to the matrix review comments had not been received. On January 24, 1997, the NSNF program received the completed RCR forms with the WSRS proposed comment resolutions. With the implementation audit scheduled two weeks later the NSNF program made a decision to evaluate the WSRS proposed responses, during the implementation audit. The audit team evaluated the WSRS responses and proposed corrective actions during the audit and found that several of the proposed corrective actions were inadequate or incomplete. The problems identified were documented as Observations in the audit report, and DOE-SR was requested to respond to the observations and provide corrective actions. All the observations were being tracked for resolution and closure. A follow-up visit was conducted the week of May 5, 1997 to evaluate resolution of the observations identified during the implementation audit. The observations that identified the incomplete resolutions for the original matrix RCR forms were indeed completed and ready for closure. The final closure of the observations and acceptance of the WSRS QARD requirements matrix will be addressed in a memorandum that will be issued the week of May 19, 1997, and all issues will be evaluated during the follow-up implementation audit scheduled for September 1997.

In summary, the implementation audit was indeed conducted prior to final acceptance of the matrix; however, the deficiencies noted during the matrix review were documented and later evaluated during the audit. The incorrect and incomplete corrective actions were documented as "Observations" during the audit and were being tracked for correction, verification and closure. At the exit meeting for the implementation audit, WSRS was given a verbal acceptance of their QA program. This was followed by a letter of acceptance dated March 6, 1997. The transmittal memorandum for the WSRS audit report dated March 14, 1997 again notified WSRS of acceptance of their QA program based upon the audit results and correcting the identified deficiencies and observations. PMP 5.02, "Program Execution Documents" does provide the sequence for acceptance of a documented QA program prior to performing an implementation audit; however, the impact of acceptance of the WSRS QA program prior to their QARD requirements matrix is negligible.

YM-97-D-030, Block 17 - Action to Preclude Recurrence.

PMP 5.02 will be revised to relax the rigid sequence for QA program acceptance. Where deficiencies are noted during documentation reviews, and properly identified for tracking purposes, the implementation audit may be utilized as the vehicle for verification and closure of open document issues.

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WASHINGTON, D.C.

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PR/DR CONTINUATION PAGE

Verified Corrective Action completion on 7/30/97, as follows:

Obtained Revision 2 of PMP 5.02 and confirmed that procedure revision had been approved prior to the due date of June 30, 1997. In accordance with the "Action to Prevent Recurrence" commitment in the DR response, Section 4.e.1(c) and the preceding note allow greater flexibility in the sequence of program acceptance. The resolution of requirements matrix concerns and program acceptance activities may now be part of the implementation audit. Revision 2 is effective 7/31/97.

QAR James E. Clark Date 7/30/97

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WASHINGTON, D.C.

8 ☒ Performance Report
☐ Deficiency Report

NO. YM-97-P-009

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

QARD, Revision 5

2 Related Report No.

EM-ARC-97-05

3 Responsible Organization:

EM-67-NSNF Program

4 Discussed With:

R. Davis

5 Requirement/Measurement Criteria:

QARD, Revision 5, Section 17.2.1.A requires that documents that provide evidence of the quality of those activities associated with the characterization of DOE Spent Fuel, and conditioning through acceptance of DOE Spent Fuel be classified as lifetime QA records.

6 Description of Condition:

PMP 18.03, Revision 1, "Administration and Conduct of Surveillances" designates surveillance reports that may document the quality of work activities as nonpermanent quality records.

7 Initiator C.C. Warren

C. C. Warren

Date 4/4/97

9 Is condition an isolated occurrence?

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

10 Recommended Action: (Not required for PR)

11 QA Review:

QAR C.C. Warren

Date 4-8-97

12 Response Due Date

20 working days from issuance

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

Printed Name C. C. Warren

Signature C.C. Warren

Date 4-8-97

22 Corrective Action Verified

QAR

C.C. Warren

Date 7-22-97

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

AOQAM

N/A

Date

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PR/DR NO. YM-97-P-009
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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

PMP 18.03, "Administration and Conduct of Surveillances," will be revised to identify surveillance reports as "project lifetime records." Obtain the surveillance reports for surveillances 97-NSNF-S-003 and 97-NSNF-S-014 from the NSNF Document Control Center and reidentify them as project lifetime records.

15 Extent of Condition: (Not required for PR)

NSNF auditors have completed two surveillances and submitted the surveillance reports to the NSNF Document Control Center - surveillances numbered 97-NSNF-S-003 and 97-NSNF-S-014.

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:

June 30, 1997

19 Response by:

R. D. Davis, NSNF QAPM *A.D. Anderson for*

☒ Initial

☐ Amended

Date 5/14/97

Phone (208) 526-4244

20 Response Accepted

QAR

CC. Wa

Date 5-16-97

21 Response Accepted (N/A for PR):

AOQAM

N/A

Date

VERIFICATION OF PERFORMANCE REPORT (PR) YM-97-P-009

Revision 2 to PMP 18.02, "Administration and Conduct of Surveillances" was reviewed to verify the designation of surveillance reports as lifetime records. Issued surveillance reports (2 total) have been submitted to records and designated as lifetime records.

CC. Warren 7-21-97
C. C. Warren, QAR