



## Department of Energy

Washington, DC 20585

QA: L

OCT 30 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

### EVALUATION OF RESPONSES TO DEFICIENCY REPORT (DR) YM-97-D-055 AND YM-97-D-056 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT OQA-SA-97-20 OF BECHTEL NEVADA

Reference: DRs YM-97-D-055 and YM-97-D-056, OQA Proposed Responses, dtd  
10/01/97

The OQA staff has evaluated the responses to DRs YM-97-D-055 and YM-97-D-056. The responses have been determined to be unsatisfactory because the Remedial Action needs to describe the specific actions required to correct the identified deficiencies noted and those identified in the extent of condition and/or provide documented justification for no further action required for each item.

1. Identify the cause of the identified deficiencies when it is apparent or perform a formal Root Cause Determination in accordance with Administrative Procedure 16.4Q, Root Cause Determination.
2. Corrective Action to Preclude Recurrence; identify the specific actions required to address the cause of the condition, i.e., specify the procedures requiring revision and specifically what the change will consist of.
3. Identify the name of the individual assigned responsibility for completion of the proposed actions and the anticipated completion date.

Amended responses are required to be submitted to this office within ten working days of the date of this letter. Send the original of your responses to Deborah Sult, OQA/QATSS, P.O. Box 30307, Mail Stop 455, North Las Vegas, Nevada 89036-0307. If an extension to the due date is necessary, it must be requested in writing, with appropriate justification, prior to that date.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Donald J. Harris at (702) 794-1467.

OQA:JB-0205

Enclosure:  
DRs YM-97-D-055 and  
YM-97-D-056

*James Blaylock for*  
Donald G. Horton, Director  
Office of Quality Assurance

*Recip: Nmss / PAAL*

*NH33*

*Wm-11  
102.7*

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Printed with soy ink on recycled paper



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PDR WASTE  
WM-11

PDR

OCT 30 1997

cc w/encl:

T. A. Wood, DOE/HQ (RW-55) FORS  
J. O. Thoma, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
R. C. Cutshaw, Bechtel, Las Vegas, NV  
S. H. Field, Bechtel, Las Vegas, NV  
Stephen Metta, Bechtel, Las Vegas, NV  
L. J. Renfro, Bechtel, Las Vegas, NV  
R. G. Helms, M&O, Las Vegas, NV  
R. W. Henderson, M&O, Las Vegas, NV  
B. R. Justice, M&O, Las Vegas, NV  
R. A. Morgan, M&O, Las Vegas, NV  
W. D. Schutt, M&O, Las Vegas, NV

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV  
D. J. Harris, OQA/QATSS, Las Vegas, NV  
D. G. Sult, OQA/QATSS, Las Vegas, NV  
R. W. Clark, DOE/OQA, Las Vegas, NV

OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.8 ☐ Performance Report  
☒ Deficiency Report

NO. YM-97-D-055

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## PERFORMANCE/DEFICIENCY REPORT

## 1 Controlling Document:

Performance Assurance Management Program (PAMP) B-A20/9601,  
Revision 0 and L-J14.001C, Revision 0, Credit Card Program

## 2 Related Report No.

OQA-SA-97-20

## 3 Responsible Organization:

Civilian Radioactive Waste Management System  
Management & Operating Contractor (CRWMS M&O) /  
Bechtel Nevada (BN)

## 4 Discussed With:

C. Tunley and W. Endow

## 5 Requirement/Measurement Criteria:

- 1) PAMP Section 7.2.2: Procurement documents issued at all Tiers of Procurement shall include provisions for the following, as deemed necessary by BN: a) Scope of work; b) Technical and administrative requirements; c) Quality program requirements; d) Rights of access; e) Documentation requirements; and f) Nonconformances.
- 2) PAMP Section 7.2.3: Procurement Document Review - A review of the procurement documents and changes thereto shall be made to ensure that documents transmitted to the prospective supplier includes appropriate provisions to ensure that items or services will meet the specified requirements and perform as expected.

See Page 3

## 6 Description of Condition:

- 1) Procurement Document PO 13514 to Labquip failed to prescribe the Technical and Quality Requirements in accordance with Requirements. Work Order sheets for credit card purchases from Spectris Technologies (4/3/97), Kena Nutronics Corp., and Hewlett Packard failed to include the requirements to the credit card suppliers.
- 2) Contrary to the requirements, the credit card purchases were not adequately reviewed to ensure the specified requirements were passed on to the prospective suppliers (i.e., Varsala, Hewlett Packard, TSI, Spectris Technologies and Kena Nutronics Corp.)

See Page 3

## 7 Initiator

Donald J. Harris

Date 6/3/97

## 9 Is condition an isolated occurrence?

☐ Yes☒ No☐ Unknown; Must be Yes if PR

## 10 Recommended Action: (Not required for PR)

- 1) Terminate the use of Credit Card on Quality Affecting Services.
- 2) Determine the extent of Credit Card use related to YMP services and the effect thereof.

## 11 QA Review:

QAR

DONALD HARRIS

Date 6/11/97

## 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 R.W. C. [Signature]

For

Date 6/25/97

## 22 Corrective Action Verified

QAR

Date

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

AOQAM

Date

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

PR/DR NO. YM-97-D-055

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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:

☐ Initial

☐ Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

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WASHINGTON, D.C.

<sup>8</sup> ☐ Performance Report  
☒ Deficiency Report

NO. YM-97-D-055

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PR/DR CONTINUATION PAGE

**5 Requirement/Measurement Criteria:**

- 3) L-J14.001C, Credit Card Program, Section 4.2.2; Card Holder, Section 4.2.2.2. Review the request to verify that the item(s) is not among the following which are considered unacceptable: "...Items Having Quality Assurance Requirements..."

**6 Description of Condition:**

- 3) Credit Card procurements are contrary to the requirements contained in the LID for the credit card program, which specifies that it is unacceptable to procure services on a credit card for items having Quality Assurance Requirements. Examples of credit card procurement for calibration services were: Varsala, Hewlett Packard, TSI, Spectris Technologies and Kena Nutronics Corp.

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PR/DR NO. DR YM-97-D-055  
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QA: L

PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

The Cal Lab procurement instructions will be augmented to clearly identify the quality documentation requirements of the calibration services transaction by reference to applicable industry standard(s); i.e., ANSI/NCSL Z540-1, and supplier confirmation to perform to the standard(s).

The Cal Lab's credit card purchases are monitored to acquire services only from qualified suppliers. Suppliers who are approved for the Bechtel Nevada Qualified Suppliers List are required to have the necessary quality program in place to satisfy Bechtel Nevada's Performance Assurance Management Program. To minimize the potential for miscommunication, the Cal Lab Instruction for Credit Card Procurement, Chapter 13, "Subcontracted Calibration Services," will be revised to include a standardized paragraph on the Work Sheet for the calibration service requirements. The instructions will also include a checklist to be followed to verify satisfactory documentation of the Quality component of the transaction.

15 Extent of Condition: (Not required for PR)

To determine the extent of the condition, the subject credit card transactions were evaluated with a review of the work Sheet, Supplier's transaction documentation, and the Certificates of Calibration and accompanying data.

- 1) Clear instructions on the required wording for the credit card transaction work sheets were not fully implemented.
- 2) A documented process to verify receipt of the requested service was not implemented.

See Attached continuation:

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:

10/01/97

19 Response by: S.H. Freid, BN (via Steven Smith, M&O)

*Steven Smith*  
Date 09/19/97

Phone (702) 295-4234

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR)

DOQA

Date

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NO. DR YM-97-D-055  
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PR/DR CONTINUATION PAGE

Continuation of Item 15, Extent of condition:  
Hewlett Packard:

The work order sheet for Hewlett Packard specifies military calibration with as-found; as-left data; OOT Report; standards traceable to NIST. This information along with the telephone confirmation of the order and the use of a credit card are sufficient to obtain the required service, including adequate specification of applicable quality requirements. Receipt of certificate and data requested was confirmed (Bechtel Nevada ID #0007458).

Spectris Technologies:

The work order sheets for Spectris Technologies (Brueel & Kjaer) specify MIL STD calibration which with the telephone confirmation of their acceptance of the order and the use of a credit card are sufficient to obtain the required service, including adequate specification of applicable quality requirements. Receipt of certificates and data requested was confirmed (Bechtel Nevada ID #s 999189, 999190, 999191, 999196, and 999250).

King Nutronics:

The work order to King Nutronics specifies ANSI Z540-1 calibration with data to be reported for the incoming equipment (prior to repair or re-standardization), NIST traceability report of standards used, and the data reported after services were performed (as left if repaired or re-standardized, for all ranges). This information along with the telephone confirmation of the order and the use of a credit card are sufficient to obtain the required service, including adequate specification of applicable quality requirements. Receipt of certificate and data requested was confirmed (Bechtel Nevada ID #998011).

Summary:

- 1) Credit Card purchases involving YMP services were conducted with five different suppliers.
- 2) Three of the transactions were for calibrations, and a review of the certificates and data received for these three transactions verified the supplier's compliance to the necessary requirements.
- 3) One transaction for repair and calibration of an item resulted in the return of a YMP item with a response that the item was not repairable.
- 4) The remaining transaction was for a repair and adjustment for which the item upon return was calibrated in the Bechtel Calibration Laboratory.

See Attached copy of letter from Bechtel to YMP.

# **Bechtel Nevada**

Mailing address: P.O. Box 98521  
Las Vegas, NV 89193-8521  
Express mail only: 2021 Lasso Road  
North Las Vegas, NV 89030-4134

F200-SF-97-097

July 22, 1997

S. D. Balley  
M&O, Contracting Officer's Manager Technical Representative  
TRW Environmental Safety Systems, Inc.  
1252 Town Center Drive  
Las Vegas, NV 89134

Subject: Contract No. DE-AC08-95NV11718  
BECHTEL NEVADA (NV) RESPONSE TO DOE OCRWM OFFICE OF  
QUALITY ASSURANCE (DOE/OQA) DEFICIENCY REPORT NO. YM-97-  
D-055  
Project No. 0058

Jan Renfro, BN's Project Manager for support to the Yucca Mountain Project (YMP), received the subject Deficiency Report (DR) on July 15, 1997. As the Manager of Scientific Services, I am responsible for oversight of BN's Standards and Calibration Laboratory, which was audited by representatives of the DOE OCRWM OQA organization on May 29 - 30 of this year. Attached you will find our response to DR YM-97-D-055.

Although our response does not concur with the audit recommendation to terminate the use of credit cards for obtaining calibration services, we are confident that the modifications that we are making to our work processes and procedures will eliminate the underlying concerns, which is to ensure that the requirements and standards by which calibrations are to be performed are clearly stated on our procurement documents and that upon completion, our process includes documentation that the vendor performed the calibration to those standards. In addition, our examination of the extent to which credit cards were used to procure calibration services in behalf of the YMP, and the possible effect of that usage reveals that five transactions were made. Three transactions were for calibrations. A review of the certificates and data received from these transactions verified the suppliers' compliance to the necessary requirements. One transaction for repair and calibration of an item resulted in the return of a YMP item with a response that the item was not repairable. The remaining transaction was for a repair and adjustment for which the item upon return was calibrated in the Bechtel Calibration Laboratory.

In conclusion, our evaluation confirmed that the calibration services provided to the YMP using BN's credit card purchase method has not resulted in any reduction in the level of rigor or standards by which the calibration services were performed. Further, subsequent to the supplier quality audit on May 29 - 30, we are making several modifications to our methodology and procedures for obtaining calibration services using purchase cards that will ensure complete documentation of the quality requirements for all such future transactions.



F200-SF-97-097

S. D. Bailey

Page 2 of 2

July 22, 1997

If you have questions about our response, please call me at 295-2708, or contact Jan Renfro at 295-2293.



S. H. Freid

Manager of Scientific Services

SHF:LJR:eab

Subject Code: WMT 29

Enclosure: Bechtel Nevada Response to Deficiency Report YM-97-D-055

cc: Correspondence Control, w/enc., NLV008

J. J. Adams, YMSCO, w/o enc., 423

R. C. Cutshaw, BN, w/enc., NLV007

W. Y. Endow, BN, w/enc., NLV064

J. P. McGoldrick, TRW, w/enc., 523

S. Metta, BN, w/enc., NLV007

E. T. Molnar, BN, w/enc., NLV005

L. J. Renfro, BN, w/enc., NLV079

S. K. Shook, BN, w/enc., NLV018

J. A. Van Prooyen, BN, w/o enc., NLV001

## **ENCLOSURE**

### **BECHTEL NEVADA CALIBRATION LABORATORY RESPONSE TO DEFICIENCY REPORT NO. YM-97-D-055**

#### **PO #13514:**

Review and evaluation of the Purchase Order #13514 reveals that procurement from a qualified supplier and the criteria in the purchase order satisfies the Section 7.2.2, "Content of the Procurement Documents. Procurement documents issued at all tiers of procurement will include provisions for the following, as deemed necessary by BN . . ."

Labquip responded to the subject purchase order and, with their quotation, identified the criteria to which they would be performing their services. A review of the Calibration Certificates returned by the supplier shows that the requirements were satisfied.

#### **Credit Cards:**

##### **14. Remedial Actions:**

The Cal Lab's credit card purchases are monitored to acquire services only from qualified suppliers. Suppliers who are approved for the Bechtel Nevada Qualified Suppliers List are required to have the necessary quality program in place to satisfy Bechtel Nevada's Performance Assurance Management Program. To minimize the potential for miscommunication, the Cal Lab Instruction for Credit Card Procurement, Chapter 13, "Subcontracted Calibration Services," will be revised to include a standardized paragraph on the Work Sheet for the calibration service requirements. The instructions will also include a checklist to be followed to verify satisfactory documentation of the Quality component of the transaction.

##### **15. Extent of Condition:**

To determine the extent of the condition, the subject credit card transactions were evaluated with a review of the Work Sheet, Supplier's transaction documentation, and the Certificates of Calibration and accompanying data.

#### **Hewlett Packard:**

The work order sheet for Hewlett Packard specifies military calibration with as-found; as-left data; OOT Report; standards traceable to NIST. This information along with the telephone confirmation of the order and the use of a credit card are sufficient to obtain the required service, including adequate specification of applicable quality requirements. Receipt of certificate and data requested was confirmed, (Bechtel Nevada ID#0007458).

### **Spectris Technologies:**

The work order sheets for Spectris Technologies (Brue & Kjaer) specify MIL STD calibration which with the telephone confirmation of their acceptance of the order and the use of a credit card are sufficient to obtain the required service, including adequate specification of applicable quality requirements. Receipt of certificates and data requested was confirmed, (Bechtel Nevada ID#s 999189, 999190, 999191, 999196, and 999250).

### **King Nutronics:**

The work order to King Nutronics specifies ANSI Z540-1 calibration with data to be reported for the incoming equipment (prior to repair or re-standardization), NIST traceability report of standards used, and data reported after services were performed (as left if repaired or re-standardized, for all ranges.) This information along with the telephone confirmation of the order and the use of a credit card are sufficient to obtain the required service, including adequate specification of applicable quality requirements. Receipt of certificate and data requested was confirmed, (Bechtel Nevada ID#998011).

### **Summary:**

- 1) Credit Card purchases involving YMP services were conducted with five different suppliers.
- 2) Three of the transactions were for calibrations, and a review of the certificates and data received for these three transactions verified the supplier's compliance to the necessary requirements.
- 3) One transaction for repair and calibration of an item resulted in the return of a YMP item with a response that the item was not repairable.
- 4) The remaining transaction was for a repair and adjustment for which the item upon return was calibrated in the Bechtel Calibration Laboratory.

### **16. Root Cause Determination:**

- 1) Clear instructions on the required wording for the credit card transaction work sheets were not fully implemented.
- 2) A documented process to verify receipt of the requested service was not implemented.

### **17. Action to Preclude Recurrence:**

The Cal Lab procurement instructions will be augmented to clearly identify the quality documentation requirements of the calibration services transaction by reference to applicable industry standard(s), i.e., ANSI/NCSL Z540-1, and supplier confirmation to perform to the standard(s).

Response by:

  
Sheldon H. Freid

Date: 7/22/97

Phone: 702-295-2708

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

☐ Performance Report  
☒ Deficiency Report

NO. YM-97-D-056

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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:

Performance Assurance Management Program (PAMP) B-A20/9601, Revision 0, and L-A20.012, Revision 0, Supplier Evaluation and Qualification.

2 Related Report No.

OQA-SA-97-20

3 Responsible Organization:

Civilian Radioactive Waste Management System  
Management & Operating Contractor (CRWMS M&O) /  
Bechtel Nevada (BN)

4 Discussed With:

Rick Cutshaw and Steve Metta

5 Requirement/Measurement Criteria:

- (1) PAMP Section 7.2.5, Source Evaluation and Selection - The selection of suppliers shall be based on evaluation of their capability to provide items or services in accordance with the requirements of the procurement documents prior to award of contract.
- (2) PAMP Section 7.2.5.2, Procurement of Items or Services Critical to Environment, Safety, Health, or Quality - Measures for evaluation and selection of procurement services and the results shall be documented. User group surveys, supplier evaluations (history, records or survey), inspection and test results, and performance data shall be reviewed to determine procurement effectiveness.

See Page 3

6 Description of Condition:

- (1)a. Contrary to the Requirement in Item (1), Section 5, of this DR, L-A20.012, Supplier Evaluation and Qualification, Section 9.2, provides exemptions from qualifying suppliers based on BN Recognized Certifying Organization - an organization that has been recognized by BN Performance Engineering staff with concurrence of the functional manager as having authority to qualify suppliers of specific materials and services. Example of acceptable certification organizations for calibration services are: National Institute of Standards and Technology (NIST), PM Equipment Laboratories, Sandia Primary Standards Laboratory, Nevada State Weights and Measures, Colorado Engineering Station, and for Analytical Laboratories the California Department of Health Services.

7 Initiator

Donald J. Harris

Date 6/3/97

9 Is condition an isolated occurrence?

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

10 Recommended Action: (Not required for PR)

- 1) Revise L-A20.12 to comply with the PAMP, Revision 0, Requirements, which will comply with the Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance Requirements and Description.
- 2) Evaluate extent and impact on the calibration services perform for the Yucca Mountain Project.

11 QA Review:

QAR *Donald J. Harris* Date 6/25/97

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 *R. W. Clap* for

Date 6/25/97

22 Corrective Action Verified

QAR

Date

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

AOQAM

Date

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

PR/DR NO. YM-97-D-056

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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:

☐ Initial

☐ Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

AOQAM

Date

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<sup>8</sup> ☐ Performance Report

☒ Deficiency Report

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**PR/DR CONTINUATION PAGE**

**5 Requirement/Measurement Criteria:**

- (3) PAMP Section 7.2.7, Qualified Suppliers List (QSL) - The QSL process shall include, as a minimum, provision for adding and deleting suppliers, limitations, reference to applicable quality assurance program, approval date, method of evaluation and re-evaluation due date.
- (4) PAMP Section 7.2.8, Supplier Performance Evaluation - Measures shall be established to periodically monitor suppliers' and, as necessary, subcontractors' performance to ensure that acceptable items and services continue to be supplied. Monitoring shall be at intervals to a degree consistent with the items or services complexity, risk, quantity and frequency of procurement.

**6 Description of Condition:**

- (1)a. Continued...

The State of Nevada, Department of Agriculture, as identified on the BN QSL, dated 5/30/97, identifies the qualification method as "Default" based on L-A20.012, Section 9.2. The State of Nevada have been used for Calibration of Mass Weights, which are used for calibration of Yucca Mountain Balances.

**Note:** Bechtel Nevada is also considering using the "Default" for the National Voluntary Laboratory Accreditation Program (NVLAP), Standard Reference Materials Program (SRMP), Standard Reference Data Program (SRD), and Weights and Measures Program (OWM), as defined in the NIST Calibration Services User Guide dated 1997, additionally ISO 9002 Certified Suppliers.

**Note:** The OCRWM program AP-7.4Q, Maintenance of the OCRWM Qualified Suppliers, Section 1.0, states, "NIST is considered qualified without evaluation or audit." This is the only relief from the requirements that was sanctioned in writing by the USNRC.

- (1)b. Contrary to the Requirements in Items (1) and (2), Section 5, of this DR, L-A20.012, Revision 0, Supplier Evaluation and Qualification, fails to require:

- a) An audit of the Default Suppliers. It appears they could be retained on the QSL based on the default requirement in the procedure, Section 9.2.
- b) Initial supplier audit of suppliers qualified based on review of quality records and history in accordance with Sections 4.3 and 4.4 of L-A20-012 (i.e., these suppliers are not audited). The QSL indicated a re-evaluation is due three years from the qualification date.

**Note:** The Triennial period begins when an audit is performed; this sets the triennial date. Without the initial audit, BN would be operating at risk for the three year period.

- (2) Contrary to the Requirements in Items (2) and (4), Section 5, of this DR, L-A20.012, Supplier Evaluation and Qualification fails to address performance evaluation to ensure that acceptable items and services continue to be supplied. The QSL reflects an expiration date three years from qualification (except in a few cases).
- (3) Contrary to the Requirement in Item (3), Section 5, of this DR, the QSL dated 6/2/97 fails to address limitations, or reference to the applicable Quality Assurance program, e.g., ANSI/NCSS Z540, MIL-STD-45662A, MIL-I-45208, etc.

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

1. Section 9.2 of Procedure L-A20.012, "Supplier Evaluation and Qualification," will be revised to state, "measuring and testing equipment including equipment that contains software or programmable hardware, shall be calibrated, adjusted, and maintained as a unit at prescribed intervals, or prior to use, against reference calibration standards having traceability to nationally recognized standards, or other nationally recognized primary calibration organizations based on the type of services requested by BN. If no nationally recognized standards or physical constants exist, the basis for calibration shall be documented."

See continuation sheet for additional actions.

15 Extent of Condition: (Not required for PR)

The problems stated in the subject deficiency report did not have a technical impact on the calibration services provided to the YMP.

1. Two of the organizations on the Acceptable Certifying Organization list (Section 9.2 of procedure L-A20.012 which will be deleted) have been utilized for YMP calibration services, Sandia Primary Standards Laboratory (SPSL), and Nevada State Weights and Measures (NSWM). The SPSL is presently on the YMP Qualified Supplier List (QSL). The SPSL is presently on the YMP Qualified Supplier List (QSL). The NSWM, which was previously on the YMP QSL will be assessed by BN.

See continuation sheet for additional information.

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:

10/01/97

19 Response by: R.C. Cutshaw, BN (via Steven Smith, M&O)

*Steven Smith*

Date 09/19/97

Phone (702) 295-4234

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR)

DOQA

Date

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

NO. DR YM-97-D-056  
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PR/DR CONTINUATION PAGE

Continuation of Item 14, Remedial actions:

- 2 A list of suppliers of calibration services and/or instrument/equipment repair services that were requalified based upon a record review at the triennial period have been provided by the BN Calibration Laboratory. An on-site assessment will be performed by each facility. Those vendors that supply services for YMP will now have an initial and triennial review performed by assessment with yearly records performance reviews.
3. Section 4.5.1, "Supplier Evaluation and Qualification," will be revised to include requirements for yearly performance evaluation to specified criteria.
4. Future published revisions to the QSL will denote the specific quality standard to which the vendor subscribes.
5. A new section will be added to L-A20.012, "Supplier Evaluation and Qualification," stating, "Items and/or services provided for YMP must be provided by a supplier that has been placed on YMP's QSL or BN's QSL based on an acceptable initial assessment. The supplier shall remain on BN's QSL providing that the annual performance review and triennial assessment are acceptable.
6. It is our understanding that the YMP QSL is currently maintained on the YMP intranet. We request that TRW provide BN with access to the YMP intranet or provide a hard copy of the QSL periodically to me.

BN has initiated the above actions. We anticipate completion by October 30, 1997. We are confident that these actions are sufficient to ensure that the issues stated in the subject deficiency will be corrected.

Continuation of Item 15, Extent of Conditions:

2. Two of the organizations on the Acceptable Certifying Organization list (Section 9.2 of procedure L-A20.012 which will be deleted) have been utilized for YMP calibration services, Sandia Primary Standards Laboratory (SPSL), and Nevada State Weights and Measures (NSWM). The SPSL is presently on the YMP Qualified Supplier List (QSL). The SPSL is presently on the YMP Qualified Supplier List (QSL). The NSWM, which was previously on the YMP QSL will be assessed by BN.
3. Initial reviews of suppliers of services and items to BN are performed as described within the test of L-A20.012, "Supplier Evaluation and Qualification." Assessments are performed triennially or, in some cases, more frequently than triennially, based on the importance of the items or services being provided. These requirements are defined in DOE Order 5700.6C and the BN Performance Assurance Management Plan (PAMP), BN Document No. B-A20/96.01. To date, all calibration suppliers utilized for YMP have been initially evaluated by assessments.

See Attached copy of letter from Bechtel to YMP.



# **Bechtel Nevada**

Mailing address: P.O. Box 98521  
Las Vegas, NV 89193-8521

Express mail only: 2621 Losee Road  
North Las Vegas, NV 89030-4134

RECEIVED

JUL 24 1997

S.H. FREID

A200-RC-97-0036

July 24, 1997

S. D. Bailey  
M&O, Contracting Officer's Manager  
Technical Representative  
TRW Environmental Safety Systems, Inc.  
1252 Town Center Drive  
Las Vegas, NV 89134

Subject: Contract No. DE-AC08-96NV11718  
**BECHTEL NEVADA (BN) RESPONSE TO DOE OCRWM OFFICE OF QUALITY  
ASSURANCE (DOE/OQA) DEFICIENCY REPORT NO. YM-97-D-056**  
Project No. 0058

Jan Renfro, BN's Project Manager for support to the Yucca Mountain Project (YMP), received the subject Deficiency Report on July 15, 1997. As the Director of Performance Assurance, I am responsible for oversight of BN's Qualified Supplier Program which was audited by representatives of the Department of Energy (DOE) OCRWM OQA organization as part of an audit of BN's Calibration Laboratory on May 29-30, 1997. The problems stated in the subject deficiency report did not have a technical impact on the calibration services provided to the YMP.

In response to the concerns identified in the subject DR, BN will execute the following actions.

1. Section 9.2 of procedure L-A20.012, "Supplier Evaluation and Qualification," will be revised to state, "measuring and testing equipment including equipment that contains software or programmable hardware, shall be calibrated, adjusted, and maintained as a unit at prescribed intervals, or prior to use, against reference calibration standards having traceability to nationally recognized standards, or other nationally recognized primary calibration organizations based on the type of services requested by BN. If no nationally recognized standards or physical constants exist, the basis for calibration shall be documented."

Two of the organizations on the Acceptable Certifying Organization List (Section 9.2 of procedure L-A20.012 which will be deleted) have been utilized for YMP calibration services, Sandia Primary Standards Laboratory (SPSL), and Nevada State Weights and Measures (NSWM). The SPSL is presently on the YMP Qualified Supplier List (QSL). The NSWM, which was previously on the YMP QSL will be assessed by BN.

2. Initial reviews of suppliers of services and items to BN are performed as described within the text of L-A20.012, "Supplier Evaluation and Qualification." Assessments are performed triennially or, in some cases more frequently than triennially, based on the importance of the items or services being provided. These requirements are defined in DOE Order 5700.6C and the BN Performance Assurance Management Plan (PAMP), BN Document No. B-A20/96.01. To date, all calibration suppliers utilized for YMP have been initially evaluated by assessments.

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S. D. Bailey

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A list of suppliers of calibration services and/or instrument/equipment repair services that were requalified based upon a record review at the triennial period have been provided by the BN Calibration Laboratory. An onsite assessment will be performed of each facility. Those vendors that supply services for YMP will now have an initial and triennial review performed by assessment with yearly records performance reviews.

3. Section 4.5.1, "Supplier Evaluation and Qualification," will be revised to include requirements for yearly performance evaluation to specified criteria.
4. Future published revisions to the QSL will denote the specific quality standard to which the vendor subscribes.
5. A new section will be added to L-A20.012, "Supplier Evaluation and Qualification," stating, "Items and/or services provided for YMP must be provided by a supplier that has been placed on YMP's QSL or BN's QSL based on an acceptable initial assessment. The supplier shall remain on BN's QSL providing that the annual performance review and triennial assessment are acceptable."

It is our understanding that the YMP QSL is currently maintained on the YMP intranet. We request that TRW provide BN with access to the YMP intranet or provide a hard copy of the QSL periodically to me.

BN has initiated the above actions. We anticipate completion by October 30, 1997. We are confident that these actions are sufficient to ensure that the issues stated in the subject deficiency will be corrected. If you have questions regarding this, please call me at 295-2877 or contact Steve Metta at 295-2571.



R. C. Cuthaw, Director  
Performance Assurance

RCC:SM:ver  
Subject Code: WMT 29

cc: Correspondence Control, NLV008  
D. M. Burnett, BN, NLV018  
W. Y. Endow, BN, NLV064  
S. H. Freid, BN, NLV038 ✓  
S. Metta, BN, NLV007  
E. T. Molnar, BN, NLV006  
R. Nilsen, BN, NLV001  
L. J. Renfro, BN, NLV079  
S. K. Shook, BN, NLV018