



# Department of Energy

Washington, DC 20585

QA: L

SEP 16 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 RESPONSE TO DEFICIENCY REPORT (DR) LVMO-96-D-028

In preparation for performing verification of corrective actions for DR LVMO-96-D-028 (scheduled for completion July 27, 1997), the Office of Quality Assurance (OQA) determined that, despite being previously accepted by former Civilian Radioactive Waste Management System Management and Operating Contractor (CRWMS M&O) Quality Assurance (QA) personnel, your proposed corrective action response (dated May 7, 1997) is unsatisfactory. This conclusion is based on the following:

1. On May 15, 1996, an amended response to this DR was submitted to the CRWMS M&O QA organization. Section 12 of this response titled "Remedial Actions; Amended Response" indicated that ten activities are being conducted by various groups within the University Systems. This response indicated that the University Systems were considered Augmented Staff to the CRWMS M&O. This was based on an interpretation by CRWMS M&O Contracts and CRWMS M&O QA of Lessons Learned 92-001. A review by OQA has determined that this interpretation was in error.
2. The responses reviewed did not address all of the basic issues described in Block 6, "Description of Condition," of the DR. For example, one of the basic issues states in part "... the University Systems are currently doing work ... without a contractual/procurement document in place ...;" and another states in part "... QA has not been included in the review process for the contractual/procurement documents that are in process."
3. The responses reviewed indicated that some of the "Q" activities will be controlled under the CRWMS M&O QA Program; however, the response does not specify which activities, at what location, or how this will be accomplished.
4. The responses reviewed are inconsistent with the corrective action response to Corrective Action Request YM-97-C-001, dated September 2, 1997, that states that the University Systems are to be considered as suppliers/contractors.

Your response to this DR does not provide adequate objective evidence that technical and quality requirements have been specified or controlled by the CRWMS M&O as required by the Quality Assurance Requirements and Description document.

It is requested that the CRWMS M&O initiate the required procurement actions to assure work being performed by the University Systems is adequately specified and controlled.

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REC'D: NMS / PAHL

An amended response is required to be submitted to this office within ten working days of the date of this letter. Send the original of your response to Deborah G. 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 Lawrence W. McGrath at (702) 734-0882.

  
for Donald G. Horton, Director  
Office of Quality Assurance

OQA:JB-2308

Enclosure:  
DR LVMO-96-D-028

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

cc w/o encl:  
W. L. Belke, NRC, Las Vegas, NV  
D. G. Sult, OQA/QATSS, Las Vegas, NV  
L. W. McGrath, OQA/QATSS, Las Vegas, NV  
R. W. Clark, DOE/OQA, Las Vegas, NV

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**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document: QARD and QAP-7-3	2 Related Report No. N/A
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3 Responsible Organization: Scientific Program Operations	4 Discussed With: L. Hayes, R. Henning, N. Hodgson, J. Willis, R. Justice
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5 Requirement/Measurement Criteria:  
 QARD, Rev. 5, para. 7.2.1.E, states "Procurement planning shall be accomplished as early as possible, and no later than at the start of those procurement activities which are required to be controlled."

QAP-7-3, Rev. 0, para. 5.2.2.B, states in part "The designated Document Preparer shall prepare procurement requirements documents that include the following:

1. Statement of work
2. Applicable technical requirements
3. Applicable quality assurance requirements..."

(continued on page 3)

6 Description of Condition:  
 Contrary to the above requirements, the University Systems (UNLV, UNR, DRI) are currently doing work for the following activities without a contractual/procurement document in place that defines their statement of work or that identifies the applicable QA program they should be using:

1. Climatic Implications of Terrestrial Paleocology
2. Seismic Monitoring (addressed in PR LVMO-96-P-03)
3. Natural Resource Assessment
4. Natural Phenomena & Human Activities that Might Degrade Surface Markers & Monuments
5. Tracer Testing
6. Characteristics of the Effects of Man-Made Materials on Chemical & Mineralogical Changes in Post-Emplace. Environments\*
7. Biological Sorption and Transport\*

\*NOTE: Work for these activities may be on hold

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7 Initiator <i>Debbie Kurluy</i> Date <i>3/13/96</i>	9 QA Review QAR <i>Debbie Kurluy</i> Date <i>3/13/96</i>
10 Response Due Date <i>April 12, 1996</i>	11 QA Issuance Approval QAR (PRI)/AQQAM <i>[Signature]</i> Date <i>3/13/96</i>

12 Remedial Actions:

13 Remedial Action Response By:  Date	14 Remedial Action Due Date  Date
15 Remedial Action Response Acceptance QAR Date	16 PR Verification/Closure QAR Date

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**DEFICIENCY REPORT**

**17 Recommended Actions:**

1. Initiate/complete procurement documents to address these activities.
2. Develop a transition plan for those activities transitioned from other AOs which will be completed under the M&O QA program.
3. Ensure all appropriate reviewers are included in the review process of the procurement documents.
4. Conduct an investigation to determine if there are any other activities (both within the University Systems and in other areas) in which similar situations exist.

**18 Investigative Actions:**

**19 Root Cause Determination:**

**20 Action to Preclude Recurrence:**

<b>21 Response by:</b>  Date	<b>22 Corrective Action Completion Due Date:</b>
<b>23 Response Accepted</b>  QAR Date	<b>24 Response Accepted</b>  AOQAM Date
<b>25 Amended Response Accepted</b>  QAR Date	<b>26 Amended Response Accepted</b>  AOQAM Date
<b>27 Corrective Actions Verified</b>  QAR Date	<b>28 Closure Approved by:</b>  AOQAM Date

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PR/DR CONTINUATION PAGE

5. Requirement/Measurement Criteria (cont'd)

QAP-7-3, Rev. 0, para. 5.3.1.C, states in part "The Document Preparer shall include as reviewers a technical representative, the Quality Manager, the Task Manager...."

6. Description of Condition (cont'd)

In addition, QA has not been included in the review process for the contractual/procurement documents that are in-process.

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**PERFORMANCE/DEFICIENCY REPORT RESPONSE**

**14 Remedial Actions:**

The following remedial actions will address the unsatisfactory conditions documented in IOC LV.QA.SPN.04/97-083:

1. No further action will be performed for those corrective actions or portions of corrective actions that were satisfactorily verified
2. Activities not funded for 1997 require no further action
3. Training issues identified will be corrected and documented (includes procedure training, qualification, verification of education)
4. Activities funded for FY 1996 and/or 1997 will be identified as active or not active, QA or not QA, and for those activities identified as active QA, implementation of the QA program will be achieved and documented

**15 Extent of Condition: (Not required for PR)**  
Addressed in accepted amended response dated 5/15/96

**16 Root Cause Determination: (Not required for PR)** Required  Yes  No  
Addressed in accepted amended response dated 5/15/96

**17 Action to Preclude Recurrence: (Not required for PR)** Required  Yes  No  
Addressed in accepted amended response dated 5/15/96

**18 Corrective Action Completion Due Date:**

07/27/97

**19 Response by:** Candance Lugo

- Initial  
 Amended

Date 05/05/97

Phone 5-3560

**20 Response Accepted**

QAR

*Paul S. Abene* Date 5/7/97

**21 Response Accepted (N/A for PR):**

AOQAM

*C. J. G. [Signature]* Date 5/7/97