



Department of Energy
Washington, DC 20585

QA: L

OCT 30 1997

R. W. Clark, Deputy 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

ISSUANCE OF DEFICIENCY REPORT (DR) OQA-98-D-003 RESULTING FROM AN
OBSERVATION BY CHARLES F. BARTLEY

Enclosed is DR OQA-98-D-003 generated as a result of an observation by
Charles F. Bartley.

Please provide a response to this deficiency that meets the applicable requirements of
Administrative Procedure 16.1Q, Performance/Deficiency Reporting. 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 dates.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or
Lawrence W. McGrath at (702) 794-1431.

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

OQA:JB-0207

Enclosure:
DR OQA-98-D-003

cc w/encl:

J. O. Thoma, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
C. F. Bartley, M&O, Las Vegas, NV
James Blaylock, DOE/OQA, Las Vegas, NV

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV
L. W. McGrath, OQA/QATSS, Las Vegas, NV
D. G. Sult, OQA/QATSS, Las Vegas, NV

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THIS IS A RE- STAMP

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

8 ☐ Performance Report
☒ Deficiency Report

NO. OQA-98-D-003

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PERFORMANCE/DEFICIENCY REPORT**1 Controlling Document:**

AP-7.4Q/Revision 2 and QAP-7.2/Revision 2

2 Related Report No.

N/A

3 Responsible Organization:

Office of Quality Assurance (OQA)

4 Discussed With:

Vic Barish, Robert Justice, Robert Habbe, Bob Morgan

5 Requirement/Measurement Criteria:

AP-7.4Q/Rev 2 Section 5.4.1 b) states "OQA: Forward by a cover memo, a copy of the initial supplier audit report and SER to the Affected Organization".

AP-7.4Q/Rev 2 Section 5.4.2.b) states "Affected Organization: Determine if the supplier is qualified for the intended scope of work, based on the above evaluation. On the cover memo, indicate qualification status, sign date, and return, with any necessary supporting documentation, to OQA".

(Block 5 continued on page 3)

6 Description of Condition:

Memos being generated in accordance with AP-7.4Q/Rev 2 and QAP 7.2/Rev 2 by OQA do not contain a place for the signature and date of the Authorized Affected Organization Representative to indicate the Supplier Evaluation Report (SER) has been evaluated by the Affected Organization. Examples: Memos OQA:JB-2119 (dated August 21, 1997, Horton to Foust) and OQA:JB-2158 (dated August 22, 1997, Horton to Foust)

Memos being generated in accordance with AP-7.4Q/Rev 2 and QAP 7.2/Rev 2 by OQA provide direction to the Affected Organization Representative that is in direct conflict with the procedure requirements. Examples: Memos OQA:JB-2119 (dated August 21, 1997, Horton to Foust) and OQA:JB-2158 (dated August 22, 1997, Horton to Foust) state "...Please sign and date Section 6 of the enclosed SER and return the original to me". Affected Organization Representatives are not identified in QAP 7.2/Rev 2 Section 4.0 as having responsibilities in the procedure nor do the instructions for the SER block 6 (Attachment 4) identify the Affected Organization or have instruction for the Requestor to complete the form. (Block 6 continued on page 3)

7 Initiator

Charles F. Bartley

Date 10/02/97

9 Is condition an isolated occurrence?
☐ Yes ☐ No ☐ Unknown; Must be Yes if PR
10 Recommended Actions: (Not required for PR)**11 QA Review:**

QAR

Date 10/21/97

12 Response Due Date

20 working days from issuance

13 Director, OQA Issuance Approval: (QAR for PR)

Printed Name

DG Horton

Signature

James B. Houghton Jr.

Date 10/24/97

22 Corrective Actions Verified

QAR

Date

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

DOQA

Date

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

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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

21 Response Accepted (N/A for PR)

QAR

Date

DOQA

Date

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PR/DR CONTINUATION PAGE

Block 5 Requirements/Measurement Criteria: (Continued)

QAP-7.2/Rev 2 Section 5.1.3 c) states "Director, OQA: Generate a memo notifying the Affected Organization of the Supplier Evaluation results, including, as applicable, recommendations, proposed restriction to be placed on the supplier during the procurement and any known deficiencies. In, addition the memo shall include provisions for the Affected Organization to identify if the supplier is qualified, qualified with restrictions, or not qualified, for their intended scope of work, based on the Affected Organization's evaluation of the enclosed documentation. The memo, shall also provide a place for the signature and date of the Authorized Affected Organization Representative and contain a request to return the memo, when signed, along with any necessary supporting documentation, to OQA".

Block 6 Description of Condition: (Continued)

K/PB representative has signed in Section 6 the SERs for Terracon Consultants Western Inc. and Energy Steel & Supply Co. per the direction given in memos OQA: JB-2119 and OQA:JB-2158, which is in conflict with the requirements of AP-7.4Q/Rev 2 and QAP 7.2/Rev 2. K/PB should be signing the cover memos as required.

Another example of the condition can be seen in memo OQA:CEH-2363 (dated September 19, 1997, Horton to Foust) which also directs the Affected Organization Representative to complete Section 6 of the SER for Pierce Leahy Archives by signing and dating.

There is indication also that other SERs were completed in the same manner as the references above. The SER for Servco, Surveyors Service Co. has also been signed in Section 6 by a K/PB representative. The SER for Heusser Neweigh has been signed and dated in Section 6 of the SER by the M&O representative.

INITIATOR NOTE: During the review of AP-7.4Q/Rev 2 draft a comment was made by the M&O that stated "AP-7.4Q/Rev 2 requires Affected Organizations (AOs) to interface and document actions on the SER in accordance with QAP 7.2/Rev 2. Since the actions are required to be completed in accordance with AP-7.4Q/Rev 2, then QAP 7.2 is not at the proper procedure level for AOs to perform these actions. The interface for the AOs to complete their actions would require QAP 7.2 to become an AP or AP-7.4Q would need to be revised to include the SER from and instructions. QAP 7.2 is an OCRWM level procedure which does not require the AOs to implement". The accepted response to the M&O comment from the review Coordinator of AP-7.4Q/Rev 2 draft stated "Removed the requirement for Affected Organization to document actions on the SER. The action will be identified in the Transmittal Memo".