



Department of Energy

Washington, DC 20585

QA: L

NOV 14 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) YM-97-D-067
RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT
OQA-SA-97-025 OF FRAMATOME TECHNOLOGIES, INC.

The OQA staff has evaluated the response to DR YM-97-D-067. The response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this date must be requested in writing, with appropriate justification, prior to the date. Please send a copy of extension requests to Deborah G. Sult, OQA/QATSS, P.O. Box 30307, Mail Stop 455, North Las Vegas, Nevada 89036-0307.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Richard L. Maudlin at (702) 794-1302.

R.W. Clark
for Donald G. Horton, Director
Office of Quality Assurance

OQA:JB-0323

Enclosure:
DR YM-97-D-067

- 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. W. Henderson, M&O, Las Vegas, 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
- R. L. Maudlin, 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
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8 Performance Report
 Deficiency Report
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document Framatome Technologies, Inc. QA Program Manual, Revision 3		2 Related Report No. OQA-97-SA-025	
3 Responsible Organization: Framatome Technologies, Inc. / CRWMS M&O		4 Discussed With: Emily Mayhew, William DeCooman, Lance Harbison	
5 Requirement/Measurement Criteria: <p>FTI QA Program Manual, Section 1.3.4, states in part: "Both NDE and Eddy Current Level III Examiners in Lynchburg...functionally report to the FTI, Director QA when performing inspections."</p> <p>Records Management Manual 1E1, Section 2.2.3, Revision 15, states in part: "Qualification and training records are maintained in two hour fire rated cabinets by the Training Records Department of INS Services or Plant Component Services."</p> <p>FTI QA Program Manual, Section 4.2.3, states in part: "Procedures are established for the review of procurement documents by FTI QA to determine that quality requirements are correctly stated, inspectable, and controllable; that there are adequate acceptance and rejection criteria."</p>			
6 Description of Condition: <p>Contrary to the above:</p> <p>A. NDE Level III personnel do not report to the FTI QA Director when performing inspections. They report to their respective department head.</p> <p>B. No documented evidence could be provided to reflect the cabinet where NDE Qualification records are being maintained is certified with a 2 hour fire rating.</p> <p>C. FTI purchase orders (PO) issued to Cooper Heat, PO 58227, and American Tank, PO 57173, did not reflect any evidence of QA requirements being included in the purchase orders.</p>			
7 Initiator <i>R. Maudlin</i> Richard L. Maudlin		9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown; Must be Yes if PR	
Date <u>07/08/97</u>			
10 Recommended Action: (Not required for PR) <p>A. Revise the FTI QA Manual, Section 1.3.4, to accurately reflect current reporting responsibilities for NDE Level II personnel when performing inspections.</p> <p>B. Acquire documented evidence that the file cabinets being used to house the personnel qualification records meet the requirements for a 2-hour rated file cabinet or re-evaluate the means of an alternative storage method such as dual storage.</p> <p>C. Evaluate the cause and depth of the problem with the lack of specific QA requirements not being specified in FTI procurement documents for quality affecting activities. Determine if there is any impact on quality due to the lack of specific QA requirements. If the referenced procurement documents are still active, modify accordingly to include the specifics of what quality requirements are to be imposed for the scope of work.</p>			
11 QA Review: QAR <i>R. Maudlin</i>		12 Response Due Date 20 working days from issuance	
Date <u>07/08/97</u>			
13 Director, OQA Issuance Approval: (QAR for PR) Printed Name Donald G. Horton		Signature <i>R.W. Clap</i> for Date <u>7/17/97</u>	
22 Corrective Action Verified QAR		23 Closure Approved by: (N/A for PR) DOQA	
Date			

ENCLOSURE

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:
See attached pages block #14

15 Extent of Condition: (Not required for PR)
See attached pages block #15

16 Root Cause Determination: (Not required for PR) Required: Yes No

17 Action to Preclude Recurrence: (Not required for PR) Required: Yes No
See attached pages block #17

18 Corrective Action Completion Due Date:

11/28/97

19 Response by:

CWC
for HAB

K.K. Bhasin, for AWS

Date 10-23-97 Phone 54416

20 Response Accepted

OAR

Manelli

Date

11/06/97

21 Response Accepted (N/A for PR)

DOQA

R.W. [Signature]

Date

11/13/97

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14. Remedial Actions:

A. Condition, NDE Level III personnel do not report to the FTI QA Director when performing inspections. They report to their respective department head.

Paragraph 1.3.4 states in part. "Level III Examiners ... functionally report to the FTI, Director of QA when performing inspections." The choice of the word inspections for this paragraph is inappropriate and should have been examinations of certification activities. This is taken from ASNT-CP-189 (1991) requiring the Principal Level III (Examiner) to be appointed by the Corporation. The QA Director prepares a letter of recommendation for the NDE Level II Examiners, one for each discipline, that is approved by the FTI President. The QA Director is required to assume the administrative duties as the Examiner when the Level III Examiner is absent, as defined in FTI NDE Procedure ISI-26. The level III Examiners report to the QA Director when performing the duties of administering the exams to the FTI NDE Personnel requiring re-certification since this is a shared duty.

To assure this paragraph is clearly understood, FTI QA will issue a Letter of Clarification to each Controlled Manual holder to clearly state the intent of this specific paragraph. This paragraph will be revised at the next revision of the FTI QA Program.

B. Condition, No documented evidence could be provided to reflect the cabinet where NDE Qualification records are being maintained is certified with a 2 hour fire rating.

FTI is in the process of purchasing two, 2 hour, fire rated file cabinets with the appropriate documentation. FTI Procurement has located a supplier but due to the cost a Capital Appropriations Request is in process. All training records associated with the OCRWM program will be sent to Waste Package Development in Las Vegas to become part of the records package for the program. This will provide dual storage until the cabinets are delivered.

C. FTI PO's to Cooperheat, 58227, and American Tank & Fabrication Co. 57173, did not reflect evidence of QA Requirements.

Cooperheat in Piscataway, NJ: PA83-795268-00 was reviewed, signed and issued as nuclear safety related, Level 1A, to a QA Approved Supplier, that was audited by FTI. The FTI QA administrative and programmatic procurement requirements were fulfilled and the Purchase Authorization (PA) was transmitted into the formal FTI Safety Related Purchase Order (PO) 58227 as required by FTI Procedure 1212-12, revision 25.

American Tank & Fabricating Co. In Cleveland, OH: PA 83-791735-00 through -13 were issued as nuclear safety related, Level 1A, with an ADL listing all the applicable documents and a SRD listing the QC Surveillance Requirements imposed on this non audited supplier. The FTI QA administrative and programmatic procurement requirement were fulfilled and the Purchase Authorization (PA) was transmitted into the formal FTI Safety Related Purchase Order (PO) 57173 as required by FTI Procedure 1212-12, revision 25.

Continuous surveillance was performed as required by the SRD and the QASR documented the activities verified, witnessed, observed, and performed. The ADL required the FTI Traveler that was used to record the activities performed and who performed those actions under the FTI QA Program. The ADL listed all the FTI drawings, procedures, and instructions approved for use. This satisfied the administrative and programmatic requirements of the FTI Safety Related QA Program and the customer PO requirements.

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15. Extent of the Condition

A. The condition does not effect the quality or integrity of the Closure Weld Methods Program.

B. The condition has resulted in an internal FTI generated Capital Appropriations Request written to the FTI program. There is no effect on the Closure Weld Methods or the NDE program because all of these records pertaining to the Yucca Mountain Project will be submitted as part of the records package for the final report.

C. The QA requirements for American Tank and Fabricating were verified by direct supervision of all of the activities at that facility by Framatome QA personnel. The material ordered from Cooperheat consisted of connectors and thermal couple wires. Cooperheat has provided a COC to verify the requirements. (Attached). A copy of the Cooperheat P.O. to Thermo Electric will be provided. Documentation of the Cooper heat QSL, or audit report, will be provided. In the event the QA trail cannot be demonstrated an IOC, by the responsible engineer will be provided to state that commercial thermocouple supplies are adequate for the purpose.

16. Root Cause Determination

A. A root cause determination is not required for this condition since it does not affect the Waste Package Closure program. The condition is internal to FTI's QA program.

B. A root cause determination is not required for this condition since it does not effect the Waste Package Closure program. The condition is internal to FTI's QA program and does not effect Waste Package Development because of the requirement imposed upon FTI to submit all training records to Las Vegas for storage.

C. A root cause determination is not required. This is a difference in the FTI requirements and terminology and the OCRWM requirements. This will be dealt with procedurally.

17. Action to Preclude Recurrence:

A. The action to preclude recurrence is as described in Block 14.

B. The action to preclude recurrence is as described in Block 14.

C. In the case of Cooperheat, FTI believes the issuance of the safety related PO and PA are sufficient to obtain the correct level of quality product.

In the case of American Tank and Fabrication Company, FTI believes that the surveillance of the entire operation is sufficient to ensure that the Safety Related Requirements were in place and that their is no impact. Both of the purchase orders are no longer active.

To prevent recurrence of this issue, any future purchase orders issued by FTI for the OCRWM projects will contain words to the effect "Invoke your QA program which has been audited and meets the FTI safety related QA program." This requirement will be included in any future Technical Guidelines Documents and be assured by a revision to NLP-7-3.

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