



Department of Energy
Washington, DC 20585

QA: L

NOV 14 1997

L. H. Barrett, Acting Director (RW-1)
Office of Civilian Radioactive Waste Management
U.S. Department of Energy, Headquarters
Forrestal Building
1000 Independence Avenue, SW
Washington, DC 20585

**EVALUATION OF RESPONSE TO DEFICIENCY REPORT (DR) YM-97-D-086
RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT
OCRWM-ARC-97-23**

The OQA staff has evaluated the response to DR YM-97-D-086. 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 Donald J. Harris at (702) 794-1467.

RW. Cel
for Donald G. Horton, Director
Office of Quality Assurance

OQA:JB-0325

Enclosure:
DR YM-97-D-086

cc w/encl:

R. A. Milner, DOE/HQ (RW-2) FORS
B. S. Murthy, DOE/HQ (RW-3) FORS
C. E. Weber, DOE/HQ (RW-3) FORS
Samuel Rousso, DOE/HQ (RW-50) FORS
C. M. Lukasik, DOE/HQ (RW-56) FORS
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OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

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

NO. YM-97-D-086PAGE 1 OF 2
QA: L**PERFORMANCE/DEFICIENCY REPORT****1 Controlling Document:**

HLP-2.1Q, Revision 0/ICN 3, Verification, Indoctrination, and Training of Personnel

2 Related Report No.

OCRWM-ARC-97-23

3 Responsible Organization:Office of Civilian Radioactive Waste Management
(OCRWM), Headquarters (HQ)**4 Discussed With:**

Christine Lukasik, OCRWM HQ Training Officer

5 Requirement/Measurement Criteria:

A.) HLP-2.1Q, Revision 0, ICN 3, paragraph 5.6.1.e) states in part that the "Employee: Complete a Self-Study Sheet, Attachment 8, upon conclusion of any initial proficiency, maintenance, or special task self-study assignments."

B.) HLP-2.1Q, Revision 0, ICN 3, paragraph 5.7.1.a) states "Manager/Supervisor: Evaluate and assess the need for changes to proficiency or maintenance requirements based on changes to assignment, position, responsibilities, implementing document, or to reflect changes in technology or methods."

C.) HLP-2.1Q, Revision 0, ICN 3, paragraph 5.8.1 states "Manager/Supervisor: Notify the Training Officer via the TAS when an employee is: a) Realigned, b) Reassigned, c) Terminated, d) Detailed/Leave of Absence."

6 Description of Condition:

Contrary to the above requirements, the auditor determined by review of the following employee indoctrination and training files that objective evidence does not exist in the files to verify completion of Training Assignment Sheet (TAS) required training.

1. James Dolman: Formal classroom attendance for Training Modules TR01, Quality Assurance Program Orientation and TR109, Quality Assurance Requirements and Description Orientation.
2. Nancy Hardwick: Self-Study Sheets for AP 16.1 and AP 16.2, Revision 2, ICN 0.
3. Ronald Milner: Self-Study Sheets for procedure revisions issued since October 1996 (the date of the last self-study posted in his file). In addition, the file does not contain a revised TAS for his new position as required by procedure.

An interview with Christine Lukasik, OCRWM HQ Training Officer, revealed the HQ training personnel cannot access the Yucca Mountain Site Characterization Office training database to verify status/completion of training for HQ personnel. Therefore, the extent of this deficiency can only be determined by physical review of file contents.

7 Initiator*Gary Wood*
Gary Wood

Date 8/27/97

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

1. Review the HQ personnel Indoctrination and Training files to determine the extent of the deficiency.
2. Identify those HQ personnel who have not completed their required initial proficiency and/or self-study proficiency training.
3. Determine if any of the personnel performed quality affecting work prior to completing their initial or self-study proficiency training.
4. Determine the impact of personnel not having completed their initial or self-study proficiency training on the quality affecting work.
5. Implement any required and appropriate corrective actions for the completed quality affecting work.
6. Implement corrective action to prevent recurrence.

11 QA Review:

QAR Gary Wood

Gary Wood
Date 08/27/97**12 Response Due Date**

20 working days from issuance

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

Printed Name Donald G. Horton

Signature *James Blaylock Jr.*

Date 10/6/97

22 Corrective Action Verified

QAR

Gary Wood

Date 10/24/97

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

DOQA

ENCLOSURE

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:

1. James Doman's current Training Assignment Sheet lists a requirement for classroom training for Training Modules TR01, Quality Assurance Program Orientation, and TR09, Quality Assurance Requirements and Description Orientation, and is marked with an "N/A" under both headings "Initial Proficiency Training" and "Maintenance" because he has already completed this classroom training. The objective evidence is documented on self-study sheet dated 11-04-94, in (closed) Weston record package S28-94-1021.00, and attendance records located in (closed) packages QRP-90-0140.1 (for TR01) and QRP-93-0742.00 (for TR09).
2. Nancy Hardwick will complete self-study sheets for AP 16.1 and AP 16.2, Revision 2, ICN 0, by the end of October 1997.
3. Ronald Milner's Training Assignment Sheet to reflect his detail to RW-2 will be updated on Monday, October 20, to be in compliance with HLP-2.1Q; he will complete self-study sheets for procedure revisions issued since October 1996 by mid-November 1997.

15 Extent of Condition: (Not required for PR)

A comprehensive manual review of all Indoctrination and Training files for HQ personnel was performed in September 1997. Twenty-eight individuals are delinquent in completing their required initial proficiency and/or self-study proficiency. Notifications are being sent by the OCRWM-HQ training officer to individuals who have outstanding self-study requirements as stated on their current Training Assignment Sheet. The required reading is requested within two weeks of the date of notification. We expect all notifications to be issued by November 6.

16 Root Cause Determination: (Not required for PR)

Required: ☐ Yes ☒ No

Employee and manager/supervisor noncompliance with HLP-2.1Q. Responsibilities are clearly delineated in Section 5 of this procedure.

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

Required: ☒ Yes ☐ No

The OCRWM-HQ training officer will be meeting one-on-one with each supervisor to discuss this deficiency report, specifically reminding them that the ultimate responsibility to prevent recurrence of this deficiency rests with them in effectively implementing HLP-2.1Q. Specific to this deficiency report, supervisors will be responsible for identifying any individuals who have performed quality affecting work prior to completing their initial or self-study proficiency training. If the supervisor determines that no quality affecting work was performed prior to individuals completing their proficiency training, a written statement will be prepared by the end of November to document this information. If the supervisor determines that quality affecting work was performed during the period when personnel were delinquent in maintaining their proficiency training, an impact statement will be prepared immediately to evaluate the impact, determine and implement any necessary corrective actions. In addition, supervisors will be asked to review and, where possible, reduce the number of people identified for quality assurance training. On a monthly basis, HQ training staff will monitor "training due" reports from TRID, and will alert employees and supervisors of outstanding self-study assignments and follow up until the action is complete.

18 Corrective Action Completion Due Date:

12/04/97

19 Response by: Sharon R. Pollock, RW-56

Sharon R. Pollock Date 10/16/97

Phone 202-586-1373

20 Response Accepted

QAR

Donald J. Harris Date 10/24/97

21 Response Accepted (N/A for PR)

DOQA

R.W. Cell Date 11/13/97

Exhibit AP-16.10.2

Rev. 06/02/97

10/16/97 LUKASIK TO HORTON

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RADIOACTIVE WASTE MANAGEMENT
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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:

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR):

DOQA

Date