

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION
QUALITY ASSURANCE SURVEILLANCE REPORT OF
THE YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT OFFICE
FIELD DOCUMENT CONTROL PROCESS
SURVEILLANCE YMP-SR-93-018
CONDUCTED FEBRUARY 16 - 18, 1993

ACTIVITIES SURVEILLED:

CHANGES TO YMP/CC-0006 YUCCA MOUNTAIN SITE CHARACTERIZATION
PROJECT OFFICE ENVIRONMENTAL MANAGEMENT PLAN, YMP/CM-0007
TECHNICAL REQUIREMENTS OF THE YUCCA MOUNTAIN SITE
CHARACTERIZATION SURFACE-BASED TRAINING YMP/CC-0009 YUCCA
MOUNTAIN SITE CHARACTERIZATION PROJECT OFFICE DESIGN PLAN

Prepared by:

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Date: 3/9/93

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Yucca Mountain Quality Assurance Division

Approved by:

D. G. Horton For

Date: 3/12/93

Donald G. Horton
Director
Office of Quality Assurance

1.0 EXECUTIVE SUMMARY

Surveillance YMP-SR-93-018 of document changes was conducted February 16 - 18, 1993 to verify that technical requirement documents have been revised in accordance with procedural requirements of Quality Assurance Procedure (QAP) 3.5, Revision 2, "Technical Document Preparation" and QAP 6.2, Revision 0, "Document Review." The surveillance was initiated in the Management and Operating (M&O) contractors office for the Plans and Procedures Department (PPD) and was tracked to the Configuration Management (CM) group of the M&O for documents under the Configuration Control Board (CCB) control, noted as CM documents, and/or Document under Configuration Control, noted as CC documents.

There were no deficiency documents issued as a result of this surveillance.

Comments resulting from this surveillance are included in Section 6.0 of this report as recommendations.

2.0 SCOPE

This report contains the results of the OCRWM Quality Assurance Surveillance YMP-SR-93-018 of the document preparation and review of modifications made to technical documents. The surveillance was conducted at the Yucca Mountain Site Characterization Project office (YMPO) in Las Vegas, Nevada by a surveillance team from the Yucca Mountain Quality Assurance Division (YMQAD) of the Office of Quality Assurance in accordance with Quality Assurance Administrative Procedure QAAP 18.3, Revision 3, "Surveillance Program."

Technical documents reviewed for compliance with QAP 3.5 and QAP 6.2 were selected from the PPD Document Tracking Report as documents submitted for changes.

The only technical documents that met the criteria as being completed in accordance with the current revisions of the QAPs were:

1. YMP/CC-0006: Yucca Mountain Site Characterization Project Office Environmental Management Plan
2. YMP/CM-0007: Technical Requirements of the Yucca Mountain Site Characterization Project Office Surface Based Testing
3. YMP/CC-0009: Yucca Mountain Site Characterization Design Plan

3.0 SURVEILLANCE TEAM

The surveillance team consisted of the following personnel:

Robert E. Harpster, Senior Quality Assurance Specialist, Surveillance Team Leader, YMQAD

A. Edward Cocoros, Senior Quality Assurance Specialist, Surveillance Team Leader, YMQAD

4.0 PERSONNEL CONTACT DURING THE COURSE OF THE SURVEILLANCE

Vincent F. Iorii, Chief Project Control Branch, YMPO

Betty G. Cruz, Manager of Specialty Engineering, M&O

Judith E. Zimmerman, PPD Supervisor, M&O

Teresa F. Roberts, PPD Acting Records Specialist, M&O

Sandra L. Moore, PPD Production, M&O

5.0 SURVEILLANCE RESULTS

The evaluation of this QA program segment was based on the examination of objective evidence to determine compliance with selected requirements taken from the following implementing procedures, QAP 3.5, "Technical Document Preparation" and QAP 6.2, "Document Review." The selected requirements are listed below.

QAP 3.5, "Technical Document Preparation"

1. Document Action Request (DAR) is properly prepared for modifications including: (Par. 5.1, Exhibit 5.1.1)
 - Definition of any previously approved DARs held for future changes. (Par. 5.4.1a)
 - Indication of method of modification (Par. 5.4.1b)
2. A draft revision is prepared (Paras. 5.4.2, 5.4.3, and 5.4.4)
3. A brief description of the changes is contained on the document title page. (Par. 5.6a)
4. The final document is prepared and approved (Par. 5.6a)

5. Recommended training is indicated (Par. 5.6a)

Based on the examination of the above requirements and the objective evidence presented in Attachment 1 of this report, the implementation of QAP 3.5 was satisfactory during the preparation of YMP/CC-0006, YMP/CM-0007, and YMP/CC-0009. Recommendations for improvement are offered in Section 6.0 of this report.

QAP 6.2, "Document Review"

1. The document review is initiated as required by:
 - Preparing Document Review Record and comment sheets (Par. 5.1a)
 - Defining review criteria (Par. 5.1b)
 - Identifying the organizations assigned and the criteria assigned to each (Par. 5.1c)
 - Assuring that the reviewers have been trained to QAP 6.2 and have education and experience as required (Par. 6.2.3)
2. The documents were reviewed as required specifically:
 - Documenting comments on the comment sheet (Par. 5.2b)
 - Properly coding mandatory comments (Par. 5.2c)
3. The review coordinator ensures that mandatory comments are responded to. (Par. 6.3.1)
4. Document reviewers indicate agreement with responses (Par. 5.3.2b)
5. Review coordinator obtains concurrence signatures (Par. 5.3.1d)

Based on the examination of the above requirements, the objective evidence presented in Attachment 1, and the training records shown in Attachment 2, the implementation of QAP 6.2 was satisfactory during the preparation of YMP/CC-0006, YMP/CM-0007, and YMP/CC-0009. Recommendations for improvement are offered in Section 6.0 of this report.

6.0 RECOMMENDATIONS

1. In accordance with QAP 3.5, Section 5.4.1.a, it is recommended that the responsible director insert the word "none" in Box 18 of the DAR, that if no previously approved DARs were held for future changes. The preparer can then understand that no other actions are needed other than the DAR under consideration.
2. Modify procedures QAP 6.2 and QAP 3.5 to clearly reflect the organizational structure, position, and individual responsibilities necessary to implement the procedures at both the OCRWM and YMP levels.
3. Attachment 3 contains recommendations from Judy Zimmerman, Supervisor, M&O. This document contains useful information regarding recommendations for process improvement. This information will be useful in the current effort to implement the Configuration Management Improvement Plan effort to streamline the CM program and integrate procedures.

7.0 ENCLOSURES

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| Attachment 1: | Objective Evidence Reviewed |
| Attachment 2: | Training Records for QAP 6.2, Revision 0 |
| Attachment 3: | Memorandum, "Plans and Procedures Department Recommendation for Process Improvement regarding Surveillance YMP-R-93-018" |

ATTACHMENT 1

Objective Evidence Reviewed

For YMP/CC-0006, Revision 1, changed to YMP 97-.04, Revision 0, "Environmental Management Plan"

1. DAR 661
2. Technical document
3. Interoffice correspondence transmitting YMP/CC-0006, now YMP/93-04 to document control. Memo, from Moor to Thompson.
4. Change Directive CR 93/167 approval to remove YMP/CC-0006, Revision 1, from CCB Control and place it under YMP Document Control.
5. Title page for Environmental Management Plan.
6. Forward for Environmental Management Plan - with approval signatures and dates.
7. Document transmittal/acknowledgement record.
8. Training records of QAP 6.2, Revision O, for reviewers of YMP, Revision 0, see attachment.
9. DRR and comment sheets.

For YMP/CM-0007, Revision 9, " Technical Requirements of the YMP Surface-Based Testing"

1. DAR 677.
2. Technical document.
3. Title page for Surface-Based Testing.
4. Approval signature page for Surface Based Testing, signed and dated.
5. Controlled Document Issuance Authorization.
6. Document Change Notice record documents the history or changes to surface-based testing.

7. Training of QAP 6.2 for reviewers of YMP/CM-0007, Revision 9.

9. DRR and comment sheets.

For YMP/CC-0009 Design Plan

1. DAR 660.

2. Technical document.

3. Interoffice correspondence transmitted YMP/CC-0009, now YMP/93-06, Revision 0, to Document control. Memo from Moor PPD to Thompson CM.

4. CD 93/067 Approval to remove YMP/CC-0009 from CCB Control and place it under the YMP Document Control.

5. Approval signature page for Design Plan, signed and dated.

6. Training of QAP 6.2, Revision 0, for reviewers to YMP/CC-0009 - see Attachment 2.

7. DRR and comment sheets.

ATTACHMENT 2

Training of OAP 6.2, Rev. O, 5/1/92, Par. 6.2.3

DAR 661
YMP/CC-0006
Revision 0

<u>Reviewer</u>	<u>Training Date</u>	<u>DRR Date</u>
Bernard Verna	09/23/92	10/02/92
Winfred Wilson	06/04/92	"
David Kerr	05/07/92	"
John Morris	11/11/92	"
Howard Atkins	07/01/92	"
David Schlick	05/12/92	"
Jim Rusk	09/16/92	"
Claudia Newbury	06/15/92	"
John Gandi	06/18/92	"

DAR 660
YMP/CC-0009
Revision 4

<u>Reviewer</u>	<u>Training Date</u>	<u>DRR Date</u>
Bernard Verna	09/23/92	10/02/92
Winfred Wilson	06/04/92	"
James Blaylock	09/10/92	"

DAR 677
YMP/CM-0007
Revision 8

<u>Reviewer</u>	<u>Training Date</u>	<u>DRR Date</u>
Richard Weeks	09/16/92	10/29/92
Ray Long	05/06/92	"

ATTACHMENT 3

PLANS AND PROCEDURES DEPARTMENT RECOMMENDATIONS FOR PROCESS IMPROVEMENT REGARDING SURVEILLANCE YMP 93-018

Surveillance YMP 93-018 was conducted in the Plans and Procedures Department (PPD) on February 16-19, 1993. The purpose of this surveillance was to discuss document processing under OCRWM QAP 3.5, Technical Document Preparation and QAP 6.2, Document Review, and to review PPD's records associated with these processes.

The OCRWM QAP 3.5 procedure does not provide a clear direction to the Preparer of a document regarding the interface between PPD and the Configuration Management/Change Control Board. When a technical document is developed or modified on the Yucca Mountain Site Characterization Project (YMP), a Document Action Request is submitted by a Preparer (Subject Matter Expert) to PPD to request a review of a new document or modification to an existing document.

Upon completion of the OCRWM QAP 6.2 review process, a publication ready copy of the document is provided to the Preparer to proceed with Change Control Board action in accordance with AP-3.3Q. Our experience in the past six months has resulted in the conclusion that Preparers are unclear on this process. The following recommendations are provided by PPD to improve the processing of technical documents.

- 1) Modify AP-3.3Q, Change Control Process, Section 5.2, "Review, Analysis, and Assessment by Affected Participants" as follows:

Add the following note to Paragraph 5.2.1, after "b) conduct technical reviews in accordance with applicable procedures, if required;"

NOTE: Reviews of documents that specify technical requirements shall be conducted through the AP-6.1Q process, i.e. Project Office Document Development, Review, Approval and Revision Control, in accordance with OCRWM QAP 3.5, Technical Document Preparation, and OCRWM QAP 6.2, Document Review, before submission of the Change Request to the CCB Secretary.

- 2) PPD has developed an implementing line procedure, ILP 6.1/YMPO-Q, Project Office Document Development, Modification, Review, and Approval Processes (copy attached), which provides guidance on the coordination between PPD and Configuration Management. This procedure is currently in the comment resolution process.

The specific language to assist with the process is contained in the following sections:

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5.1 Document Action Request:

CRWMS M&O PPD:

- g) provides an information copy of the DAR to CRWMS M&O Configuration Management (CM), if the RD indicates Project Change Control Board (CCB) action is required (DAR Block 16). (Refer to AP-3.3Q, Change Control Process and AP-3.6Q, Configuration Management.)

5.5 Approval and Issuance:

CRWMS M&O PPD:

- a) prepares the final document (if a procedure, ensures the final document is printed on Procedure Pages (Exhibits 9.1 and 9.2));

NOTE: If YMP CCB action is required, provides the RO/PPR with the final document for the RO/PPR to proceed with CCB action in accordance with AP-3.3Q.

- 3) At this time, new technical documents that are developed under OCRWM QAP 3.5 on the YMP receive a unique YMP identification number (e.g., YMP/93-01) assigned by PPD. This unique number is assigned when PPD begins processing the DAR for the new document. When the OCRWM QAP 6.2 review of the new document is completed, and the Preparer submits the technical document to Configuration Management for Change Control Board action, the CCB assigns their own number to the document.

It is difficult to track records through the process when the numbers change from PPD assigned numbers to CCB assigned numbers. Therefore, PPD would like to make the following recommendation:

PPD will contact Configuration Management to obtain a unique Change Control Board identification number (e.g., YMP/CC-0001) for new technical documents in the approved document hierarchy. This number will be assigned when the DAR for the new technical document is received in PPD. This change will enable better tracking of the document through the PPD and CM/CCB processes and the subsequent records packages.

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- 4) It is difficult for PPD to know when technical documents or revisions thereto have completed processing through the CCB. At times we have been requested to process several revisions to a document within a short period of time. We need to be informed when one revision is approved, so that we number the next revision to the document correctly. Therefore, PPD would like to make the following recommendation:

When PPD provides the DAR copy to Configuration Management indicating that a technical document is being processed through PPD, Configuration Management should add PPD to the copy list for any documentation produced which is associated with that document (e.g., Change Request, Affected Document Notice, etc.).

These recommendations should improve the processing of technical documents on the YMP.

Respectfully submitted,

Judith E. Zimmerman

Judith E. Zimmerman, Supervisor
Plans and Procedures Department