



**Department of Energy**

Washington, DC 20585

QA: QA

**MAY 29 2003**

D. W. Pearman, Jr.  
Deputy General Manager  
Bechtel SAIC Company, LLC  
1180 Town Center Drive, M/S 423  
Las Vegas, NV 89144

**EVALUATION OF INITIAL, COMPLETE RESPONSE TO AND VERIFICATION OF  
CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT (DR)  
BSC(O)-03-D-109, CONCERNING TRAINING NOT BEING ASSIGNED FOR  
ADMINISTRATIVE PROCEDURE 5.1Q**

The Office of Quality Assurance staff has evaluated the initial, complete response and verified the corrective actions of DR BSC(O)-03-D-109 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either Kerry M. Grooms at (702) 794-1367 or Donald J. Harris at (702) 794-1467.

R. Dennis Brown, Director  
Office of Quality Assurance

OQA:KMG-1285

Enclosure:  
DR BSC(O)-03-D-109

cc w/encl:

N. K. Stablein, NRC, Rockville, MD  
Robert Latta, NRC, Las Vegas, NV (2 cys)  
S. W. Lynch, State of Nevada, Carson City, NV  
L. W. Bradshaw, Nye County, Pahrump, NV  
M. J. Mason, BSC, Las Vegas, NV  
W. J. Glasser, NQS, Las Vegas, NV  
D. J. Harris, NQS, Las Vegas, NV  
D. G. Opielowski, NQS, Las Vegas, NV  
B. M. Terrell, DOE/ORD (RW-40W), Las Vegas, NV  
M. E. Van Der Puy, DOE/ORD (RW-30W), Las Vegas, NV



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

**ORIGINAL**  
IS A RED STAMP

8.  Deficiency Report  
 Corrective Action Report

No. BSC(O)-03-D-109

Page 1 of           QA: QA

**DEFICIENCY REPORT/CORRECTIVE ACTION REPORT**

1. Controlling Document: (Document ID and Revision or Date) DOE/RW-0333P, Rev. 12, "Quality Assurance Requirements and Description"	2. Related Report No.: OQA-SI-03-014
--	---

3. Responsible Organization: Bechtel SAIC Company, LLC	4. Discussed With: Paul Turner, Melinda D'Ouille, Sam Horton
---	---

5. Requirement:

1). QARD Section 2.2.12 Personnel Qualification, states in part:

A. Each affected organization shall indoctrinate and train personnel as follows...

2. Ensure personnel are indoctrinated and trained, as needed, to achieve initial proficiency; maintain proficiency; and to adapt to changes in technology, methods, or job responsibilities; ...
4. Ensure indoctrination and training are completed prior to performing the work;
5. Ensure that personnel are indoctrinated in the following topics as they relate to a particular function:
  - b) Applicable implementing documents.

6. Description of Condition:

1. Contrary to Block 5 Requirements

The training records obtained from BSC Training reflected that training for AP-5.1Q was neither assigned nor taken for the following personnel involved in developing, reviewing and approving AP-ATS-0001 (Employee training records 2280, 12041, 12203, 13793, 14495, 15168, and 15455).

Has work been stopped?  Yes  No

7. Initiator: Donald J. Harris <u>Donald J. Harris</u> <u>4/8/03</u> Printed Name                      Signature                      Date	9 Does a stop work condition exist? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A If Yes, Check One: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
--	---

10. Recommended Actions:  
None

11. QAR Review: Donald J. Harris <u>Donald J. Harris</u> <u>4/8/03</u> Printed Name                      Signature                      Date	12 Response Due Date: <u>10</u> Working days after issuance.
--	---

13. QAM Issuance Approval: R. Dennis Brown <u>[Signature]</u> <u>4/10/03</u> Printed Name                      Signature                      Date	15. QAM Closure Approval: <u>[Signature]</u> <u>4/10/03</u> Printed Name                      Signature                      Date
--	---

14. Corrective Actions Verified/Closure: <u>DONALD J. HARRIS</u> <u>Donald J. Harris</u> <u>5/6/03</u> QAR Printed Name                      Signature                      Date	15. QAM Closure Approval: <u>[Signature]</u> <u>4/10/03</u> <u>R. Dennis Brown</u> <u>4/27/03</u> Printed Name                      Signature                      Date
--	---

Submittal Page 1 of 4

2. Check if Amended   
Check if also Initial Response

3. Extended Processing  
 No  Yes (if yes, submit  
Extended Processing request)

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

1. DR/CAR NO.:  
BSC(O)-03-D-109  
PAGE OF  
QA: QA

DEFICIENCY REPORT/CORRECTIVE ACTION REPORT COMPLETE RESPONSE

4. Extent of Condition: (Amended response will be required if all Extent of Condition Investigations are not complete and documented herein)

The BSC Quality Assurance organization conducted a review of the subject findings and those results are included in the continuation page (Submittal Page 2). As noted in the deficiency report, Description of Condition, the employees were not assigned training on AP-5.1Q. The employee's BSC functional manager made the determination that this training was not required. This is consistent with AP-2.1Q, which meets the requirements of QARD section 2.2.12, Personnel Qualification. A search of training records dealing with AP-5.1Q revealed that, although not required on their current training matrix, all but one of the employees named in the DR did in fact attend AP-5.1Q training, some more than once. Also, all individuals had attended the QA indoctrination training, which meets the QARD indoctrination requirement. (Continued on Submittal Page 2)

5. Impact: (Provide an impact statement relative to waste isolation and safety, and impact to other work, if any)

There is no impact on waste isolation, safety or other work since personnel were properly trained and the procedure AP-ATS-0001 was never implemented.

6. Remedial Actions: (Document all actions necessary to address the results of the Extent of Condition)

Based on the extent of condition investigation no remedial action is required.

7.  Root Cause (For a significant CAQ, attached results of formal root cause determination prepared in accordance with AP-16.4Q)

Apparent Cause

Based on extent of condition investigation no apparent cause statement is needed.


8. Action to Preclude Recurrence: (Address those actions necessary to prevent the identified cause from recurring)

Based on extent of condition investigation no action to preclude recurrence is needed.

9. Due Date for Completion of Corrective Action:

4/23/2003

10. Responsible Manager

Paul Turner  4/23/03  
Printed Name Signature Date

11. QAR Evaluation:  Accept  Partially Accept  Reject

Re-evaluated for significance

DONALD J. HARRIS  5/5/03  
Printed Name Signature Date

12. QAM Concurrence:

RDBrown  5/27/03  
Printed Name Signature Date

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

 DR/CAR/QO SWO

NO. BSC(O)-03-D-109

PAGE OF

QA: QA

**CONDITION ADVERSE TO QUALITY CONTINUATION PAGE**

**BLOCK 4 Extent of Condition (Continued) BSC QA review of facts associated with the subject finding:**

The requirement cited in the subject DR is the QARD Section 2.2.12. This requirement is met by the following methods:

- 1) All BSC employees and subcontractors performing quality-affecting work are assigned to take LPGET00-013 INTRODUCTION TO QUALITY ASSURANCE. (Refer to DIR-TRN-001 *BSC Policy for Establishing Training*). This training informs the student of the QARD requirements and the existence of procedures with their Titles, including AP-5.1Q. It even provides an outline of what the content of each procedure should be. This is all that is needed to meet 2.2.12. [All employees named in the DR have had this training]
- 2) Their functional manager establishes their training assignment on a training requirements matrix in accordance with AP-2.1Q *Indoctrination and Training of Personnel*. This procedure was reviewed and approved by OCRWM (including OQA). This training matrix is based on a determination by the manager of the difficulty and importance of the process job functions to be preformed (Refer to MIS-ADS-AD-000001 *Training Management Manual*).

The BSC Training Process has been planned each year (refer to MOL.20030121.0051 for FY03 Plan) and that plan has been approved by OCRWM. Because of PLN-CRW-AD-000009 *Management Improvement Initiatives (MII)*, Attachment 2 of the FY03 Training Plan has a Benchmarking report that compares the OCRWM Training program to NRC regulated training programs. This report recommends that the Systematic Approach to Training be implemented prior to licensing of the facility.

The Training Management Manual, MIS-ADS-AD-000001, has initiated the implementation of the SAT process. This manual is required to be used as guidance by BSC in AP-2.1Q, 5.3(b). The SAT process requires that an analysis be conducted to determine training requirements. To date the management analysis has not been documented except in those organizations listed as part of the corrective actions on deficiency BSC (B)-03-D-40. The documentation activity related to the management review of the importance and difficulty of process implementation will be conducted by all organizations performing QA related activities for which they have developed a training matrix for their staff on or before 6/30/2003. This action is separate from this DR, and is part of the complete implementation of the SAT process, which will occur as part of the NRC Licensing process.

AP-5.1Q Training Records associated with DR BSC(O)-03-D-109

A search of training records dealing with AP-5.1Q revealed that, although not on their current training matrix, all but one of the employees named in the DR did in fact attend training, sometimes more than once.

Trainserve Employee Number 2280  
Not Taken

Trainserve Employee Number 12041

BRETEC00-042 BRIEFING--AP-5.1Q, PLAN/PROCEDURE REVIEW& APPROVAL 09/01/2000 **FINISHED**  
(Reference 1)

BRETEC01-016 AP-5.1Q, PLAN &PROCEDURE, PREP, REVW, & (FOR DC) 01/18/2001 **FINISHED**  
(Reference 2)

LPTEC00-006 AP-5.1Q PLANS & PROCEDURES PROCESS CONTROL TRAINING 07/26/2001 **FINISHED**  
(Reference)

LPTEC00-006 AP-5.1Q PLANS & PROCEDURES PROCESS CONTROL TRAINING 03/26/2002 **FINISHED**  
(Reference 3)

(Continued on Submittal Page 3)

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

DR/CAR/QO

SWO

NO. BSC(O)-03-D-109

PAGE OF

QA: QA

**CONDITION ADVERSE TO QUALITY CONTINUATION PAGE**

**BLOCK 4 Extent of Condition (Continued from Submittal Page 2)**

Trainserve Employee Number 12203

LPTEC00-006 AP-5.1Q PLANS & PROCEDURES PROCESS CONTROL TRAINING 07/06/1999 FINISHED  
(Reference 4)

Trainserve Employee Number 13793

LPTEC00-006 AP-5.1Q PLANS & PROCEDURES PROCESS CONTROL TRAINING 01/08/2002 FINISHED  
(Reference 5)

Trainserve Employee Number 14495

LPTEC00-006 AP-5.1Q PLANS & PROCEDURES PROCESS CONTROL TRAINING 04/26/2001 FINISHED  
(Reference 6)

Trainserve Employee Number 15168

LPTEC00-006 AP-5.1Q PLANS & PROCEDURES PROCESS CONTROL TRAINING 04/23/2002 FINISHED  
(Reference 7)

Trainserve Employee Number 15455

LPTEC00-006 AP-5.1Q PLANS & PROCEDURES PROCESS CONTROL TRAINING 01/08/2001 FINISHED  
(Reference 8)

LPTEC00-006 AP-5.1Q PLANS & PROCEDURES PROCESS CONTROL TRAINING 07/09/2002 FINISHED  
(Reference 9)

Reference 1 MOL.20010214.289: RECORD PACKAGE TABLE OF CONTENTS FOR TRAINING ATTENDANCE RECORDS FOR BRIEFING - AP-5.1Q, PLAN/PROCEDURE REVIEW AND APPROVAL, COURSE NUMBER: BRETEC00-042, REVISION 0 (DATE SEPTEMBER 12, 2000) (C)

Reference 2 MOL.20010719.0045 ATTENDANCE RECORD FOR AP-5.1Q PLAN AND PROCEDURES PREPARATION, REVIEW AND APPROVAL (FOR DOCUMENT CONTROL), BRETEC01-016, REVISION 0 (DATE: JANUARY 18, 2001) (C)

Reference 3 MOL.20020729.0233 ATTENDANCE RECORDS FOR: LPTEC00-006, REVISION 4, AP-5.1Q PLANS AND PROCEDURES PROCESS CONTROL TRAINING (PREVIOUS COURSE EQUIVALENCY NUMBERS LPTEC00-006.01, LPTEC00-006.00, LPTEC006EQ, QA99013, TEC97002-2, TEC97002-1, TEC97002, REVISION 1 - 3) DATES: MARCH 7, 2002 - MARCH 26, 2002 (C)

Reference 4 MOL.20000706.0163 TRAINING ATTENDANCE RECORDS FOR PROCEDURES CONTROL PROCESS TRAINING, AP-5.1Q, COURSE NUMBER QA99013, REVISION 0 (C)

Reference 5 MOL.200020606.0003 ATTENDANCE RECORD FOR: AP-5.1Q PLANS AND PROCEDURES PROCESS CONTROL TRAINING, LPTEC00-006, REVISION 3 (PREVIOUS COURSE EQUIVALENCY NUMBERS: LPTEC00-006.01, LPTEC00-006.00, LPTEC00-006EQ, QA99013, TEC97002-2, TEC97002-1, TEC97002, REVISION 0, REVISION 1 AND REVISION 2) DATE: JANUARY 8, 2002 (C)

(Continued on Submittal Page 4)

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

DR/CAR/QO  
 SWO

NO. BSC(O)-03-D-109

PAGE OF

QA: QA

**CONDITION ADVERSE TO QUALITY CONTINUATION PAGE**

**BLOCK 4 Extent of Condition (Continued from Submittal Page 3)**

- Reference 6      MOL.20011002.0938 TRAINING ATTENDANCE RECORD FOR AP-5.1Q PLANS AND PROCEDURES PROCESS CONTROL TRAINING, LPTEC00.006, REVISION 3 (C)
  
- Reference 7      MOL.200208133.0254 ATTENDANCE RECORD FOR: LPTEC00-006, REVISION 4, AP-5.1Q PLANS AND PROCEDURES PROCESS CONTROL TRAINING (PREVIOUS COURSE EQUIVALENCY NUMBERS: LPTEC00-006.01, LPTEC00-006.00, LPTEC00-006EQ, QA 99013, TEC97002-2, TEC97002-1, TEC97002, REVISIONS 1 - 3) DATE: APRIL 23, 2002 (C)
  
- Reference 8      MOL.20010606.0395: TRAINING ATTENDANCE RECORDS FOR AP-5.1Q, PLANS & PROCEDURES PROCESS CONTROL TRAINING, LPTEC00-006, REVISION 2 (PREVIOUS COURSE EQUIVALENCIES: LPTEC00-006.01, LPTEC00-006.00, LPTEC00-006EQ, QA99013, TEC97002-2, TEC97002-1, TEC97002) DATES: JANUARY 3, 2001 - JANUARY 31, 2001 (C)
  
- Reference 9      MOL.20030106.0085 ATTENDANCE RECORDS FOR LPTEC00-006, REVISION 4, AP-5.1Q PLANS AND PROCEDURES PROCESS CONTROL TRAINING (PREVIOUS COURSE EQUIVALENCY NUMBERS, LPTEC00-006.01, LPTEC00-006.00, LPTEC00-006EQ, QA99013, TEC97002-2, TEC97002-1, TEC97002), REVISION 1-3) DATE RANGE JULY 9, 2002 AND JULY 25, 2002 (C)

OFFICE OF  
CIVILIAN RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C. DR/CAR/QO  
 SWO

No: BSC(O)-03-D-109

Page \_\_\_ of \_\_\_

QA: QA

## CONDITION ADVERSE TO QUALITY CONTINUATION PAGE

## VERIFICATION OF CORRECTIVE ACTIONS FOR DEFICIENCY REPORT (DR) BSC(O)-03-D-109

1. Verified the following personnel (12041, 12203, 13793, 14495, 15168 and 15455) have received AP-5.1Q training by search of the different training modules in the records system. The following MOL.20010214.289 (Training Module BRETEC0042), MOL.20010719.0045 (Training Module BRETEC01-016), MOL.20020729.0233 (Training Module LPTEC00-006), MOL.20000706.0163 (Training Module QA99013) and MOL.200020606.003 (Training Module LPTEC00-006).
2. Verified Employee 2280 completed AP-5.1Q Training Module LPTEC00-006 on 4/23/2003.

As a result of this verification, it is recommended that this DR be closed.

Donald J. Harris  
Donald J. Harris, QAR

5/5/03  
Date

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

DR/CAR/QO  
 SWO

NO. BSC(O)-03-D-109  
PAGE OF  
QA: QA

**CONDITION ADVERSE TO QUALITY CONTINUATION PAGE**

**BLOCK 4 Extent of Condition**

Explanation of the factors related to the condition observed by the QAR when developing this document.

During the research of the extent of condition, the QAR was lead to believe that the individuals listed in this deficiency had not been trained on AP-5.1Q prior to their development of the new procedure. This condition was in error as shown in the initial response. During the time that the QAR requested the information, the title of the AP-5.1Q training course was changed to reflect the new number of the procedure. The procedure number had been changed, as were all the numbers of the APs scheduled to be changed. BSC Training was changing the title of the course to reflect this new procedure requirement, but the course number was not changed. So when the training records person assisting the QAR reviewed whether any of the people mentioned on this deficiency had taken AP-5.1Q training, the answer in our TrainingServer computer query was "no." This condition was so even though the course number for this training had not changed, the search was made using the title name, not the course number.

As soon as it was determined that the new procedure numbering system was not going to be implemented, the title of the training course was changed back to AP-5.1Q training. Also,before the deficiency was written, the BSC Training Manager and BSC Training Supervisor discussed that any future practice of procedure title changes would require a change to the course number; therefore, the correct history of training taken would remain in the computer database.

So when the QAR requested training of these people, he and the training records individual should have researched using the course number. If that action had occurred, the perceived issue would have been discovered as a non-issue.

Normally the requestor is provided the status of the employee's training by training course title, course code (LPTEC00-006) and completion date and if requested the RPC MOL number. If equivalent courses were given credit for completion, training provided the equivalent training course number / briefing number and the completion date and if requested the RPC MOL number.