



Department of Energy
Yucca Mountain Site Characterization
 Project Office
 P. O. Box 98608
 Las Vegas, NV 89193-8608

WBS 1.2.11
 QA: N/A

JUL 28 1993

Carl P. Gertz, Project Manager, YMP, NV

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF CORRECTIVE ACTION REQUEST
 (CAR) YM-93-043 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION
 (YMQAD) AUDIT YMP-93-09 (SCP: N/A)

The YMQAD staff has verified the corrective action to CAR YM-93-043 and determined the results to be satisfactory. As a result, the CAR is considered closed.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Robert E. Harpster at 794-7365.

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-5261

Enclosure:
 CAR YM-93-043

cc w/encl:

- K. R. Hooks, NRC, Washington, DC
- S. W. Zimmerman, NWPO, Carson City, NV
- J. W. Estella, SAIC, Las Vegas, NV
- K. M. Branum, M&O/TRW, Las Vegas, NV
- P. G. Jones, M&O/TRW, Las Vegas, NV
- B. J. Verna, YMP, NV
- A. V. Gil, YMP, NV

cc w/o encl:

- J. W. Gilray, NRC, Las Vegas, NV
- N. J. Brogan, YMQAD/QATSS, Las Vegas, NV

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 PDR WASTE
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YMP-5

ADD: Ken Hooks

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

8 CAR NO.: YM-93-043
DATE: 04/13/93
SHEET: 1 OF 2
QA

CORRECTIVE ACTION REQUEST

1 Controlling Document QAP 5.1, Revision 4	2 Related Report No. YMP-93-09 (Audit)
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3 Responsible Organization YMPO Dep. Proj. Mgr., Proj. Ctrl. Branch	4 Discussed With Judy Zimmerman
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5 Requirement:
6.2.1 INTERIM CHANGE NOTICE

When urgent changes to a QA program procedure must be instituted, an ICN may be issued "at risk" with the signatures of the Associate, Office, or Division Director responsible for the work requiring the changes and the Director, OQA. A time limit, not to exceed 60 days, must be specified during which the "at risk" changes can be implemented. A DAR is initiated by the director instituting the "at risk" changes and processed in accordance with this procedure during that timeframe. Work performed in accordance with the "at risk" ICN must be identified, controlled and evaluated for impact if final changes differ from those identified in the "at risk" ICN.

6 Adverse Condition:
Violation of requirements sections 6.2.1 and 6.2.3 of QA 5.1, Revision 4

The requesting organization failed to specify a time limit, not to exceed 60 days, during which the "at risk" changes can be implemented for ICN 2 of AP-6.17Q effective date 7/23/92. The ICN is currently expired and is found in controlled document 40407.

The requesting organization failed to identify, control and evaluate for impact the work performed in accordance with the "at risk" ICN. If final changes differ from those identified at risk, the requesting organization failed to cancel the expired ICN in accordance with 6.2.3 of QA 5.1

9 Does a significant condition adverse to quality exist? Yes ___ No <u>X</u> If Yes, Circle One: A B C	10 Does a stop work condition exist? Yes ___ No <u>X</u> ; if Yes - Attach copy of SWO If Yes, Circle One: A B C D	11 Response Due Date: 20 working days from issuance
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12 Required Actions: Remedial Extent of Deficiency Preclude Recurrence Root Cause Determination

13 Recommended Actions:

7 Initiator <u>Robert E. Harpole</u> Date <u>4/12/93</u>	14 Issuance Approved by: <u>Bob Blountable</u> for Date <u>04-15-93</u>
15 Response Accepted QAR <u>Robert E. Harpole</u> Date <u>5/13/93</u>	16 Response Accepted QADD <u>[Signature]</u> Date <u>5/19/93</u>
17 Amended Response Accepted QAR _____ Date _____	18 Amended Response Accepted QADD _____ Date _____
19 Corrective Actions Verified QAR <u>Robert E. Harpole</u> Date <u>7/26/93</u>	20 Closure Approved by: QADD <u>[Signature]</u> Date <u>7/28/93</u>

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

8 CAR NO.: YM-93-043
DATE: 04/13/93
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QA

CORRECTIVE ACTION REQUEST (Continuation Page)

5 Requirements (continued)

6.2.3 CANCELLATION

A cancellation is handled as a major change to a procedure. The cancellation is documented on a memorandum with justification for the cancellation, identification of any continuing requirements incorporated in other documents, and the effective date of cancellation.

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CAR NO. YM-93-043

DATE: 04/29/93

PAGE: 1 OF 1

QA

CORRECTIVE ACTION REQUEST (Continuation Page)

1. Corrective Action Response for CAR YM-93-043

A. Remedial Action:

The Requesting Organization initiated Document Action Request 762 (copy attached) to cancel Interim Change Notice (ICN) #2 to AP-6.17Q. ICN #3 was approved and issued effective 04/15/93 (copy attached) canceling ICN #2 and reinstating the requirement for formal classroom training. A Controlled Document Issuance Authorization (CDIA) (copy attached) was transmitted by the Plans and Procedures Department (PPD) to the Document Control Center on 04/13/93 with instructions to remove ICN #2 dated 07/23/92 and replace it with the approved ICN #3.

B. Extent of Deficiency:

The Requesting Organization performed an "Impact Analysis for Work Performed" with regard to the "At Risk" ICN (copy attached) documenting that there were no impacts on the work performed while this ICN was in effect.

C. Root Cause Determination: Not required

D. Corrective Action to Preclude Recurrence:

PPD reviewed the Document Action Request (DAR) records since the issuance of Office of Civilian Radioactive Waste Management (OCRWM), Quality Assurance Procedure (QAP) 5.1, Quality Assurance Program Procedures, Revision 4, effective 05/18/92, to verify the number of "At Risk" ICNs issued since this revision became effective. The "At Risk" ICN #2 to AP-6.17Q is the ONLY "At Risk" ICN which has been issued to date on the Yucca Mountain Site Characterization Project. OCRWM QAP 5.1 is currently in draft revision (Rev. 5). In Paragraph 6.2.1 Interim Changes, the "At Risk" method for modification of a procedure has been deleted. This action will preclude recurrence of issuing "At Risk" ICNs.

2. Responsible Parties:

- A. Richard Morissette by 04/15/93 (Completed)
- B. Richard Morissette by 04/15/93 (Completed)
- C. N/A
- D. Judith E. Zimmerman by 04/29/93 (Completed)

3. Response Approved:


Vincent F. Iorri
Project Control Branch Chief

Date: 4/29/93

Stri dtd 5/12/93 - PCB: VFI-4034

YMP-108-R1
11/30/92

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT

DOCUMENT ACTION REQUEST

(DAR)

Page 1 of 1
Date 4/8/93 DAR No. 762

Signatures on this document represent signers' acknowledgement that the applicable procedure has been read, understood, and complied with.

SECTION I - ACTION REQUEST

1. DOCUMENT TITLE: <u>CLASSIFICATION OF ITEMS IMPORTANT TO SAFETY AND WASTE ISOLATION</u>	2. DOCUMENT NO.: <u>AP-6.17a</u>	3. REV/ICN: (current) <u>1/2</u>	4. <input checked="" type="checkbox"/> Q <input type="checkbox"/> NON-Q
5. TYPE OF ACTION REQUESTED: <input type="checkbox"/> Develop New Document <input type="checkbox"/> Change Existing Document <input checked="" type="checkbox"/> Cancel Document <input type="checkbox"/> Review Only (attach document) ICN 2			
6. DESCRIPTION OF ACTION REQUESTED: <u>ICN # 2 WAS DEVELOPED "AT RISK" AND SHOULD BE CANCELLED</u>	7. DOCUMENTS AFFECTED: <u>NONE</u>		
8. REASON FOR ACTION REQUEST: <u>FORMAL CLASSROOM TRAINING HAS BEEN DEVELOPED AND IMPLEMENTED. IT SHOULD NOW BE REQUIRED FOR AT MEMBERS</u> <input type="checkbox"/> Additional Material Attached	10. RELATED REPORT NUMBER:		
9. DELIVERABLE DUE DATE:	11. REQUESTED BY: <u>RICHARD MORISSETTE</u> Print Name <u>T&MSS</u> <u>794-7783</u> Organization Phone No. <u>[Signature]</u> <u>4/6/93</u> Signature Date		

SECTION II - ACTION INITIATION

12. REQUEST: <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Rejected	13. MAJOR CHANGES: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	14. PRIORITY: <input checked="" type="checkbox"/> Immediate <input type="checkbox"/> Hold
15. MODIFICATION METHOD: <input checked="" type="checkbox"/> ICN <input type="checkbox"/> Revision <input type="checkbox"/> Cancel <input type="checkbox"/> N/A	16. CCB ACTION: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
17. TRAINING RECOMMENDATION: <input type="checkbox"/> Self-Study <input type="checkbox"/> Classroom Trng. <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Other _____		

18. COMMENTS

19. PREPARER ASSIGNED: <u>Dick Morissette</u>	20. RESPONSIBLE DIRECTOR: <u>[Signature]</u> <u>4/7/93</u> For <u>Maxwell Blanchard</u> Date
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SECTION III - ACTION CONCURRENCE

21. PROJECT CONTROL BRANCH CHIEF CONCURRENCE: Request <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Rejected	<u>[Signature]</u> <u>4/8/93</u> Signature Date
COMMENTS:	

SECTION IV - ACTION REVIEW

22. TRAINING REQUIREMENTS: <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Yes - Number of Days Required for Trng.: <u>N/A</u>
COMMENTS: <u>Cancellation of ICN</u> <u>4-9-93</u> * Requires Justification in Comment Section

23. Training Officer/Training Manager: <u>[Signature]</u> <u>4/17/93</u> Signature Date	24. CRWMS M&O PLANS AND PROCEDURES (DAR Completion) <u>[Signature]</u> <u>04/23/93</u> Signature Date
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YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT
DOCUMENT REVIEW INFORMATION
(DRI)

Signatures on this document represent signers' acknowledgement that the applicable procedure has been read, understood, and complied with.

SECTION I - Action Request

1. Document Title <i>CLASSIFICATION OF ITEMS IMPORTANT TO SAFETY & WASTE ISOLATION</i>	2. Document No. <i>AP-6.17a</i>	3. Rev/ACN (current) <i>1, 2</i>	4. <input checked="" type="checkbox"/> Q <input type="checkbox"/> Non-Q
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5. Requested by:

<u><i>RICHARD MORISSETTE</i></u>	<u><i>R. Morissette</i></u>	<u><i>4/8/93</i></u>
Print Name	Signature	Date

SECTION II - Action Initiation

6. Review Coordinator appointed:

<u><i>PETE KARNOSKI</i></u>	<u><i>T&MS</i></u>
Print Name	Organization

7. Length of Time for Review: *1*
Days

- Time Priority Levels for Document Reviews:**
- a) Level 1 = Reserved for reviews tied to CARs/Deliverables - 1 to 3 days
 - b) Level 2 = Next highest priority after Level 1 - 4 to 5 days
 - c) Level 3 = Determined by scope of review. Large scope requires 10 to 15 days.

8. Standard review criteria apply? Yes - Source: *OCRWM QAP 6.2*
 No

9. Additional review criteria: Yes - List: _____
 No

10. Reviewing Organizations	Attention of	Designate Type(s) of Review to be Performed (Management, QA, etc.)
<u><i>YmPO</i></u>	<u><i>R. V. BARTON</i></u>	<u><i>MANAGEMENT</i></u>
<u><i>YMPQA</i></u>	<u><i>R. SPENCE</i></u>	<u><i>QA</i></u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

(continue on additional page if needed)

11. Responsible Director:

<u><i>Maxwell Blanchard</i></u>	<u><i>Richard Barton</i></u>	<u><i>4/8/93</i></u>
Print Name	Signature	Date

YMP-053-R1
7/1/92

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT



PROCEDURE

Title:

CLASSIFICATION OF ITEMS IMPORTANT TO SAFETY AND WASTE ISOLATION

Procedure No.: AP-6.17Q	Revision: 1	ICN: 3	Page 1 of 31
Approval: M.B. Blanchard	Date: 4/9/93	Approval: N/A	Date:
Approval: N/A	Date:	Concurrence: R.E. Spence	Date: 4/9/93

REVISION HISTORY

<u>Rev. No.</u>	<u>ICN No.</u>	<u>Effective Date</u>	<u>Description of Revision/ICN</u>
0		03/19/90	Initial issue.
1		06/10/92	Complete revision.
1	1	06/19/92	Major change to clarify applicability of process.
1	2	07/23/92	Minor "At Risk" ICN changing required training from 'formal classroom' to 'briefing' required for AT members.
1	3	04/15/93	Major change to cancel ICN 2 and reinstate the requirement for formal classroom training. Page affected is ICN 2, page 1.

YMP-061-R1
7/24/92

YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT CONTROLLED DOCUMENT ISSUANCE AUTHORIZATION (CDIA)

1. To Document Control Center/ Document & Records Center	2. WBS No. 1.2.9.3.3	3. QA Designation QA	4. YMP Change Control Board Document (If Yes, approved CD must be attached) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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5. Document Title CLASSIFICATION OF ITEMS IMPORTANT TO SAFETY AND WASTE ISOLATION	6. Document ID No. AP-6.17Q	7. Revision No. 1
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8. Directions (Include detailed directions for issuance of new documents, revisions to existing documents, supersession of documents, or obsolescence of documents. In addition, designate individuals/organizations to be on the Controlled Document Distribution List for the document [attach separate page if necessary]. Ensure that Form YMP-098 is completed for any individuals/organizations not obtainable through the CDIS.)

Attached is the approved ICN #3 to AP-6.17Q, Rev. 1, Classification of Items Important to Safety and Waste Isolation, effective date 04/15/93 to be issued.

Remove Document Approval Sheet, Rev. 1, effective date 06/10/92. Remove Interim Change Notice #1 effective date 06/19/92. Remove Interim Change Notice #2 effective date 07/23/92. Insert the new Revision History page effective date 04/15/93.

No forms are affected by the ICN.

Issue to person on controlled distribution for this document.

Copy this document single sided.

Please return the original CDIA transmittal to the CRWMS M&O Plans and Procedures Department, attention J. E. Zimmerman, for processing into the record.

9. Procedure Compliance

I have read, understood, and complied with AP-1.5Q, Rev. 7, ICN # 1, in accomplishing my responsibilities in this procedure. In addition, I have reviewed all blanks on this form (if any) and have determined that they are intentional.

Judith E. Zimmerman
Document Custodian Signature

04/13/93
Date

10. Distribution Confirmation

Judith E. Zimmerman
DCC/ARC Personnel Signature

4-15-93
Date

R. Morissette
April 8, 1993

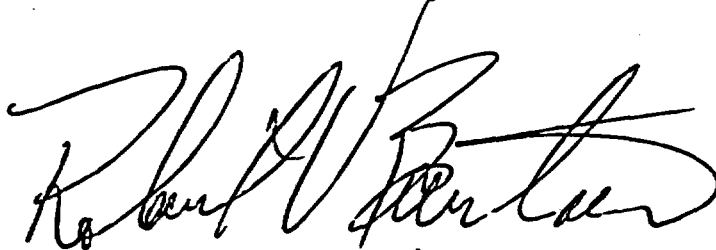
IMPACT ANALYSIS
FOR
WORK PERFORMED WITH AN AT RISK INTERIM CHANGE NOTICE ON AP-617Q

BACKGROUND

Revision 1 of AP-6.17Q required formal classroom training for baselined personnel within 34 days of its release. The "at risk" ICN #2 changed this requirement from "formal classroom" to "briefing" because the classroom training would not be available within the time limit specified. The baselined personnel to be trained prior to implementation of AP-6.17Q were defined as the members of the Assessment Team (AT). Because of delays in final selection of the Assessment Team (Letter, Blanchard to Voegelé, MBB:5405, dated 9/4/92), it was possible to develop the formal classroom training which was given on August 13 and 14, 1992.

IMPACT

Since the records shows that formal classroom training was provided, this supercedes the "at risk" ICN #2 and there were no impacts on the work performed while this ICN was in effect. A request will be made to delete the ICN since it is no longer appropriate and the requirement for formal classroom training will be maintained.


4/8/93

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

CAR NO. YM-93-043
DATE: 4-13-93
PAGE: OF
QA

CORRECTIVE ACTION REQUEST (Continuation Page)

VERIFICATION OF CORRECTIVE ACTION REQUEST (CAR) YM-93-043,
4/13/93

Verification of corrective action was completed 7/19/93 by Robert E. Harpster.
Objective evidence reviewed to verify corrective action is as follows:

- A. Remedial Action - Document Action Request (DAR) 762 to cancel Interim Change Notice (ICN) No. 2 to Administrative Procedure AP-6.17Q, ICN No. 3. Cancelled ICN No. 2 and reinstated the requirement for formal classroom training.
- B. Extent of Deficiency - The requesting organization stated that an "impact analysis for work performed" with regard to the "at risk" ICN documented that there are not impacts on the work performed while this ICN was in effect.
- C. Root Cause Determination - Not required.
- D. Corrective Action to Preclude Recurrence - A memorandum to constitute completion of corrective action was sent from J. E. Zimmerman to S. L. Moore to assure monitoring of expedited changes for procedures which are submitted to the Plans and Procedures Department with the DARs to ensure that the time limit identified for the expedited change, is not exceeded. This action is necessary because contrary to the original corrective action plan, to delete the "at risk" method for the modification of a procedure to preclude recurrence, was not implemented.

Robert E Harpster
Signature

Date 7/26/93