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Department of Energy

Office of Civilian Radioactive Waste Management Yucca Mountain Site Characterization Office P.O. Box 98608 Las Vegas, NV 89193-8608

FEB 2 2 1996

L. Dale Foust Technical Project Officer for Yucca Mountain Site Characterization Project TRW Environmental Safety Systems, Inc. Bank of America Center, Suite P-110 101 Convention Center Drive Las Vegas, NV 89109

EVALUATION OF RESPONSES TO DEFICIENCY REPORTS (DR) YMQAD-96-D021 THROUGH YMQAD-96-D024, YMQAD-96-D026 THROUGH YMQAD-96-D028 AND PERFORMANCE REPORTS (PR) YMQAD-96-P018 THROUGH YMQAD-96-P020 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION'S (YMQAD) AUDIT YM-ARC-96-03 OF KIEWIT/PARSONS BRINCKERHOFF (SCPB: N/A)

The YMQAD staff has evaluated the responses to DRs YMQAD-96-D021 through YMQAD-96-D024 and YMQAD-96-D026 through YMQAD-96-D028 and PRs YMQAD-96-P018 through YMQAD-96-P020. The responses have been determined to be satisfactory.

Verification has been completed on PR YMQAD-96-P018 and DR YMQAD-96-D021 and those are considered closed. For the remaining deficiency documents, verification of completion of the corrective actions will be performed after the effective dates provided. Any extension to these dates must be requested in writing, with appropriate justification, prior to the date. Please send a copy of extension requests to Deborah Sult, YMQAD/QATSS, 101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109.

If you have any questions, please contact either Robert B. Constable at 794-7945 or John S. Martin at 794-7881.

YMQAD:RBC-1127

Richard E. Spence, Director Yucca Mountain Quality Assurance Division

Dan

Enclosures:

- 1. DRs YMQAD-96-D021 through YMOAD-96-D024
- 2. DRs YMQAD-96-D026 through YMQAD-96-D028
- 3. PRs YMQAD-96-P018 through YMQAD-96-P020

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PDR WASTE WM-11 PDR

YMP-5

L. Dale Foust

FEB 2 2 1995

cc w/encls: T. A. Wood, HQ (RW-14) FORS J. G. Spraul, NRC, Washington, DC S. W. Zimmerman, NWPO, Carson City, NV R. L. Strickler, M&O, Vienna, VA R. P. Ruth, M&O, Las Vegas, NV cc w/o encls:

W. L. Belke, NRC, Las Vegas, NV J. S. Martin, YMQAD/QATSS, Las Vegas, NV D. G. Sult, YMQAD/QATSS, Las Vegas, NV

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1 Controlling Document:			2 Related Repo	
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3 Responsible Organization:	<u>-</u>	4 Discussed With:		·
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5 Requirement/Measurement Criteria:	<u> </u>			
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17 Recommended Act	tions:		· · · · · · · · · · · · · · · · · · ·	
I. Revise proces referenced:	dure or inspection fo	orm to identify the specifica	ntion or drawing change status; or	r if the aceptance criteria is
2. Revise proceed documented.		describe the controls which (ensure that the inspector has read	I the change and that it is
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Deficiency Report NO. JMGAD 96-DOZI PAGE 7 OF

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Performance Report

PR/DR CONTINUATION PAGE

Kiewit/PB response to DR YMQAD-96-D021

Item 1

Procedure was corrected during audit.

Item 2

Individual inspectors are not routinely made aware of ECR's and revisions to specifications. The inspectors work to procedures, not specifications. All change documents to specifications ie; ECR's, BCP's etc. are evaluated by quality engineering for impact on existing procedures or the need for new procedures. Procedures are revised or developed based on this evaluation and reading assignments are performed in accordance with pre-established core reading requirements. The core reading assignment for inspectors obviously includes revisions to QCP's. The condition described in item #1 of this DR is an isolated case. A comprehensive review of our QCP's has been performed and it has been verified that similar conditions do not exist. It certainly is not the intent of Kiewit/PB to refer inspectors to specifications for acceptance criteria.

Performance Report
 Deficiency Report

NO. YAMQAD-96-D021 PAGE OF QA: L

PR/DR CONTINUATION PAGE

VERIFICATION OF CORRECTIVE ACTION FOR YMQAAD-95-D-021

1.KIEWIT/PB MCP-5.0, REV 11, Dated 2/1/96, PROCEDURE PREPARATION AND CONTROL was reviewed to verify that the requirement: that procedures contain acceptance criteria is specified. Exhibit 5.1, paragraph 6.D(2) addresses this requirement.

2 Based on the review of the above document, the required action have been satisfactory implemented and this deficiency is considered closed.

P.H. Cotter Date

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1 Controlling Document:			2 Related Rep	
Quality Assurance Requirements and D	escription (QARD), I	OE/RW-0333P, Rev. 5	YM-ARC-96-0)3
3 Responsible Organization: Kiewit/Parsons Brinckerhoff (Kiewit/Pi	B)	4 Discussed With: Jon Christensen		
5 Requirement/Measurement Criteria:				
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RADIOACTIVE WA U.S. DEPARTM	OF CIVILIAN ASTE MANAGEMENT MENT OF ENERGY IGTON, D.C.	B DR NO. YMQAD-96- PAGE 2 OF Q
	ICY REPORT	
17 Recommended Actions: Revise procedure MCP-8.0 to specify what particular acceptance Exhibit to the procedure. Determine what, if any, other tags are being used by Kiewit/PB to	that are not described in implement	
a description of these tags and an exhibit of each in the next proc	edure revision.	
18 Investigative Actions: SEE PACE 3	<u></u>	
19 Root Cause Determination:		
NONE REQUIRED		
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20 Action to Freclude Recurrence: SEE PAGE 3		
21 Response by: 23 Response Accepted Case Date	22 Corrective Action Completion Bus Da FEBZ 3 1 24 Response Appended 1	556
OAR Sam Horton 3) Date 2/1/91 25 Amended Response Accepted	26 Amended Response Accep	·
OAR Date 27 Corrective Actions Verified	AOQAM 28 Closure Approved by:	Date
OAR Date	MADOA	Date

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Deficiency Report NO. YmQAD96-D022

Performance Report

PAGE 3 OF

QA: L

PR/DR CONTINUATION PAGE

Kiewit/PB response to DR YMQAD 96-D022

This DR addresses the situation where the use of an accept tag at receiving is not defined in our MCP's. An attempt was made during the audit to revise MCP 8.0 to address the issue which apparently, in the opinion of the auditor, was insufficient. The issue is when items are accepted at receiving, the items are then transferred to the issued for construction hold area. There are instances when it is not practical or feasible to immediately make this transfer and site QC has taken steps internally to identify which items have been accepted and which have not yet been inspected. They have elected to use a tag. Kiewit/PB feles that this level of detail is not required to be proceduralized, however, to resolve this concern, MCP 8.0 will be further revised to describe the use of the acceptance tag.

QAR REMEDIAL ACTION & RESPONSE EVALUATION The KIPB response to this DR is acceptable provided that the revision to KIPB procedure MCP 8.0 adequately describes the use of the acceptance treg & shows it as an exhibit in the procedure. S. storton Geb. 01-1996

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RADIOAC U.S. D		TE MANAGEME NT OF ENERGY	ENT	 Performance Repo Deficiency Report NO. YMQAD-96-D023 PAGE 1 OF 2 QA: L
	MANCE/DE	FICIENCY REPO		
1 Controlling Document: Quality Assurance Requirements and Description ((QARD), DOE/F	RW-0333P, Rev. 5	2 Related Re YM-ARC-96	
3 Responsible Organization: Kiewit/Parsons Brinckerhoff (Kiewit/PB)		scussed With: Christensen	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
Requirement/Measurement Criteria:			· · · · · · · · · · · · · · · · ·	
The QARD, Section 5.0, Paragraph 5.2, states, that: locuments."	"Work shall be	performed in accorda	nce with cont	olled implementing
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. Contrary to the above requirement, Kiewit/PB has Report (NCR) form. There are no provisions in N the "OTHER" disposition. Kiewit/PB NCRs 95-0	MCP 15.0 (lates 0104, 0109, 013	st revision) or YAP 13 31, and 0134 have "OT	5.1Q (Revision THER" dispos	a 2) that describes the use itions.
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17 Recommended Actions:			
	test needs to describe the disp	procedure YAP 5.2Q to change the form osition of "OTHER" and the purpose of a	
should have been. Evaluation provide documented justi		OTHER" and determine what the appropri disposition "OTHER" has had a negative ion remaining as "OTHER."	
18 Investigative Actions:	Refs 7		•
325	PAGE 3		
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19 Root Cause Determination:			
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20 Action to Preclude Recurrence SEE	PAGE 3		. <u></u>
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255		22 Corrective Action Completion Due	A A .
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	PAGE 3 	22 Corrective Action Completion Due JAN 2-6 24 Response Accepted	1996
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SEE 1 Restanse br: Definition 13 Response Accepted OAR Jam Nor	$P \neq G \in 3$ $- \frac{1/23/96}{Date}$ $2 ton Date \frac{2}{1/2}$ Accepted Date	JAN 26 24 Response Accepted ADDAM (10) Math	1996 Date 2.1

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Rev. 07/03/95

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8 Performance Report

NO. YMQAD-96-0023 PAGE 3 OF QA: L

PR/DR CONTINUATION PAGE

Response to YMOAD-96-D023 items #1 and #2

Remedial Actions:

NCRs with dispositions on "OTHER" have been reviewed and no deficient conditions have been identified.

Investigative Actions:

Kiewit/PB made no changes to the existing information on the YAP-15.1Q NCR form. Kiewit/PB needed additional information added to the form to provide some traceability information and to accommodate transferring a nonconforming condition to another controlling document. Specifically, two line items, "Work Package No." and "Traveler Line Item No.", were added to block 2 to facilitate records keeping activities and an "Other" category was added, as needed, to block 4 for dispositions such as "Transferred to NCR No. XX-XXX" and "Transferred to FDR No. XX-XXX" that do not fit any of the other categories provided on the original form.

These additions have had no impact on the NCR process nor on the proper dispositioning of any nonconforming condition.

Root Cause:

None required.

Actions to Preclude Recurrence:

1. The use of "OTHER" for dispositioning will be discontinued.

2 Kiewit/PB will use the forms prescribed by YAP-15.1Q and will enter the additional traceability information to facilitate records keeping in the appropriate block.

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		EFICIENCY REPO	0T	QA: L
Controlling Document:	UNIVANCE/DI		2 Related Re	ort No.
ACP-11.0, "Test Control" & MCP-12.0, " Con	ntrol of Measuring a	and Test Equipment"	YM-ARC-96	
Responsible Organization: Liewit/Parson: Brinckerhoff		Discussed With: Christensen	.	·····
Requirement/Measurement Criteria: ACP-11.0, "Test Control," Rev. 3, states in S measuring and test equipment to be used to per olerance to accomplish the intended function." ACP-12.0 states, "The basis for calibration acc	rform the test to ens "	sure that the equipment	is the proper t	ype, range, accuracy, and
. [.] .				
Description of Condition:		·		
his gauge, so the Physical Standards and Calib be used for calibration. For example, for gau ackage documents the tolerance used on the c roject.	oration Facility has a uge Y11497 the cal	assumed that the minor libration tolerance used	division on th was plus or m	inus 20 BAR. The data
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DEEICIEN	CY REPORT	
 Determine from the manufacturer the actual pressure tolerance Determine from the manufacturer the actual pressure tolerance Determine the tolerance to which the gauge should be read dur Determine the capability of the gauge. Using the above, document the required accuracies. Revise TCP-2.20 to properly direct the readings and identify th Revise MCP-12.0 to provide for determination of required tole calibration lab. Determine the extent of this condition with regard to other M& 	needed. ing the test. ne required gauges. grances for acceptance of calibration a	and transmit these to the
18 Investigative Actions:		·
SLE PAGE 3 (ITEMI)		
19 Root Cause Determination: SEE PARE 3 (ITEM)		
20 Action to Preclude Recurrence:		· · · · · · · · · · · · · · · · · · ·
SEE BAGE 3 (ITEM 1)		
21 Response by: Denstand Date 1/23/56	22 Corrective Action Completion FEG Z	Due Date:
23 Résponse Accepted DAR Childer Date 2/6/96	24 Response Accepted	4 Date 2.15.96
25 Amended Response Accepted	26 Amended Response Accepted	
QAR Date 27 Corrective Actions Verified	AOQAM 28 Closure Approved by: :	Date
QAR Date	AOQAM	Date

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Performance Report Deficiency Report

NO. YmQAD-96-DO24 PAGE 3 OF QA: L

PR/DR CONTINUATION PAGE

Item 1

K/PB agrees that a deficiency exists. The tolerance of the gauge sent for calibration was not specified by the manufacturer nor is it addressed in the applicable installation requirements. The calibration lab can only determine the "accuracy" of the gauge and report their findings (the tolerance shown on the lab report is for the lab's benefit only). The results are then reviewed by Quality Control for acceptability for use as allowed by MCP-12.0, 3.2.1, next to last sentence, which states:

"If no nationally-recognized standards or physical constants exist, or the manufacturer has no established method, the basis for calibration shall be documented."

The accuracy of gauge Y11497 was found to be 98.4% and greater at the pressure used in the field. This accuracy was determined to be within an acceptable range based on experience that a tolerance of +-2%, with the accompanying accuracy of 98%, is generally accepted for gauges in the construction industry when no other accuracy is specified. K/PB QC, however, failed to appropriately document this basis of acceptability in the applicable data package.

Remedial Actions:

The basis for acceptance of the accuracy of gauges supplied by Atlas Copco for use in installing Super Swellex rockbolts will be inserted in the appropriate data packages.

Remedial Action Due Date:

See "Corrective Action Due Date"

Investigative Actions:

All M&TE will be reviewed for appropriate documentation of acceptance where the manufacturer has no established method.

Root Cause Determination:

Human error. The K/PB Quality Control Manager considered this equipment to be normal commercial equipment, and required accuracy checks only to assure reasonable controls. He failed to apply all of the requirements of MCP-12.0 to gauges that had no specified tolerance or accuracy.

Action to Preclude Recurrence:

Responding to this Deficiency Report has retrained the K/PB Quality Control Manager in the Projects expectations regarding calibration of measuring equipment. Additional action in this area is not required.

Corrective Action Completion Due Date:

Feb. 2, 1996

8 Performance Report

NO. YmuAD-96. DO24 PAGE 4 OF QA: L

PR/DR CONTINUATION PAGE

Item 2

As stated previously, in the response to Item 1, since no tolerances were specified, an industry standard of plus/minus 2% was selected. Also, as previously stated, the selection of this tolerance was not documented, but will be as part of the corrective action for item 1. Gauges falling outside this acceptable range have been documented on NCR's totally unrelated to this Deficiency Report. Discussions with the supplier indicate that an accuracy of plus/minus 3% for these gauges would be acceptable. No further action is required.

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		NENT OF ENERG		NO. YMQAI
		GTON, D.C.		PAGE 1
	ORMANCE/D	EFICIENCY REP		
1 Controlling Document: MCP-17.0, Revision 9			2 Related Re YM-ARC-96	
3 Responsible Organization: Kiewit/Parsons Brinckerhoff (Kiewit/PB)		Discussed With: on Christensen	· ·	
5 Requirement/Measurement Criteria:			<u> </u>	
Paragraph 3.2.3, states, in part: "Responsible r	record sources sha	ll ensure the following	elements are fo	ollowed:
A. Legibility	·			
1. Verify that records/record packages are	legible."			
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6 Description of Condition:			· · · · · · · · · · · · · · · · · · ·	
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PAGE	2	·	OF .	2
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DEFICIENCY REPORT

17 Recommended Actions:

- 1. Evaluate the identified records to determine appropriate action; e.g., deduction of information or regeneration of the record with documented justification.
- 2. Investigate the extent of the deficiency to determine whether other records that have been turned over to the DRC or in-process records are affected by the same condition.
- 3. Re-evaluate the use of these stamps and/or the size of the stamps used.

18 Investigative Actions:

SEE PAGE 3

19 Root Cause Determination:

SEE PAGE 3

20 Action to Precisie Recurrence:

SEE PARE 3

21 Response by:		22 Corrective Action Completion Due Date:	· ·
& Ulisteron	Date 1/2-3/96	Jan 26 199(۰. ۵
23 Response Accepted		24 Response Accepted	
OART. A. Hodage	Date 1/31/96	ADDAM DINATO	Date 2.15.96
25 Amended Response Accepted		26 Amended Response Accepted	
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27 Corrective Actions Verified		28 Closure Approved by:	•
QAR	Date	ADDAM	Date

Exhibit AP-16.10.2

Rev. 07/03/8

Deficiency Report NO. Ym QAD 96-DO26 PAGE 3 OF QA: L

Performance Report

PR/DR CONTINUATION PAGE

K/PB agrees that the stated deficiency existed.

Remedial Actions:

The problem of illegible QC and date stamps was identified in August, 1995 and was addressed via QC memo 95-67 (copy attached) on August 25, 1995. Additionally, steps were taken for the Quality Coordination group to monitor QC reports generated after issuance of the memo to ascertain directive effectiveness.

Work package 1.12 was developed prior to the identification of the problem, and issuance of the memo mentioned above, and contained illegible or missing stamps and/or dates. These problems, however, were not detected during initial review of the Work Package. Work Package 1.12 has been re-reviewed to correct illegible or missing data.

Remedial Action Due Date:

See Corrective Action Completion Due Date

Investigative Actions:

Monitoring for illegible or missing data in quality documentation has been an ongoing activity since discovery in August, 1995. Documentation contained in Work Packages generated prior to August, 1995 are being reviewed or re-reviewed, as the case may be, to detect and correct any documentation that is illegible or missing.

Root Cause Determination:

QC inspector and document review personnel lack of attention to records requirements details.

Action to Preclude Recurrence:

QC inspectors were instructed in the importance of legible documentation via QC memo 95-67.

Subsequent to this audit finding each Quality Coordinator has been verbally instructed, by the QC Manager, to review records with an eye toward legibility and completeness. This verbal instruction will be reinforced via a memo to all QC personnel on the importance of complete and legible documentation. Generated QC reports are being monitored for compliance.

Corrective Action Completion Due Date:

Jan. 26, 1996



KIEWIT/PB YUCCA MOUNTAIN PROJECT

INTEROFFICE MEMO

QA: N/A SCPB: N/A QC:MEM:95-67

To:	All QC Inspectors
From:	All QC Inspectors Howard R. Cox H. C
Date:	August 25, 1995 /
SUBJECT:	ILLEDGABILITY OF INSPECTION AND DATE STAMPS

An inordinate amount of reports are being submitted without legible date and/or QC inspection stamps. This practice must cease immediately. All inspectors are responsible for the reports they generate. Besides not meeting Project requirements, illegible documentation is unprofessional.

If reports are not turned in with legible date and/or QC stamps, they will be returned for correction. Repetitive conditions will result in stamps being revoked and written signature and date required.

HRC:kck

cy: Thomas J. Tomek Wesley C. Pugmire Job File

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	OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGE U.S. DEPARTMENT OF ENER WASHINGTON, D.C.	MENT
•	PERFORMANCE/DEFICIENCY RE	PORT
1 Controlling Document: Quality Assurance Requirements ar	nd Description (QARD), DOE/RW-0333P, Rev. 5	2 Related Report No.
3 Responsible Organization: Kiewit/Parsons Brinckerhoff	4 Discussed With: Jon Christensen	
5 Requirement/Measurement Crite Section 5.0, Paragraph 5.2.2 states,	ria: in part: "Implementing documents shall include	
C. A sequential description of the v and other operations	work to be performed including controls for alteri	ng the sequence of required inspection, to
D. Quantitative or qualitative accept	ptance criteria sufficient for determining that activ	ities were satisfactorily accomplished."
Section 2.0, Paragraph 2.2.1B states work that translate QARD requirem	s: "Affected Organizations shall establish implem tents into work processes."	enting documents applicable to their sco
6 Description of Condition: Contrary to the above cited QARD		
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		ENCY REPORT	
17 Recommended Actions:	· · · · · · · · · · · · · · · · · · ·		
	.1, and VTP-001; provide method	lology, proper sequence, acceptance	criteria, and correct en
omissions.			
18 Investigative Actions:			
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19 Root Cause Determinatio			
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BLOCK 6: (Continued)

f) Section 3.6.3C Needs to address purchase orders.

- g) Section 3.6.3 The procedure does not address any procurement action when the design documents require a change to existing procurement documents.
- h) Section 3.7.5 Reference 2.6 is incorrect; it should be 2.4 and maybe 2.6.

i) Section 3.9 Supplier certification requirements appear to be out of sequence, especially if required to be in a PR (Section 3.2), purchase order (Section 3.5), and RIP (Section 3.2.10).

j) Section 3.10B Reference 2.4 should be 2.5.

k) Section 3.10D Reference 2.5 should be 2.4.

1) Section 4.2 Records turnover in conflict with YAP 17.1Q, ICN #1, Attachment 9.6 records submittals.

2) MCP-7.1, "Acceptance of Procured Items and Services"

a) Section 3.3.1C Technical verification of product produced. This requirement is also referenced in 3.3.6 and 3.9; however, the procedure does not provide any criteria or methodology.

b) Section 3.4.13 Beside the RIP there are other required documents; i.e., test reports, certifications, deficiency documents, etc.

c) Section 3.5.2A Fails to provide any methodology.

d) Section 3.7.6 QC should obtain Exhibit 5.2 from the QE and include it and the certifications with the procurement package.

e) Section 3.11.3 Established QC instructions are not identified.

- f) Section 3.13.1 Material Dedication Plan; the procedure fails to provide any criteria or methodology for the development of the dedication plan. Reference 2.9 is the QARD, which is only a requirements document; it does not provide any methodology.
- g) Section 3.13.2C Inspection is performed to the RIP, not to the dedication plan. Inspection should not have anything to do with that document.
- h) Section 4.1C This should include the supplier's documentation.
- i) The Receiving Inspector Level II uses a red ink stamp for QC review of the Level I processed documents (RIPs). The Level II stated that this stamp is for the verification of the documented entries on the RIP by the Level I. The use of this stamp is not defined or explained in this procedure.
- 3) VTP-001, "Verification Testing of Rockbolts"
- a) Section 3.6.2 Specifies the test methods of ASTMF432 and states the acceptance of the test shall be based on meeting the manufacturer's minimum published requirements. The published requirements are not a controlled document or immediately available. The quantitative or qualitative acceptance criteria should be in the VTP so the material test lab can flag discrepancies or incorporated into the RIP (or both).

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Kiewit/PB response to DOE DR YMOAD-96-D027

The following are responses to the DOE comments regarding MCP-4.0 rev 12:

Item 1(a)

Par. 3.2.5 will be revised to include review criteria for engineering review of PR's.

Item 1(b)

Since the review of PR's by construction management is basically a financial and quantity review and is not quality affecting, review criteria is not applicable, however, procedure will be modified to reflect this position.

Item 1(c)

The review criteria for QE is considered sufficient, however, Par. 3.3.1.A is somewhat unclear and will be modified for clarity.

Item 1(d)

The DR states that there are no criteria or methodology for bid/proposal evaluation. Although the Kiewit/PB procedure essentially repeats the evaluation criteria contained in the QARD, we believe that this is adequate for the following reasons:

A very limited number of proposals for quality-related procurements are conducted. There are currently no plans for additional procurements to be made from qualified suppliers.

The Kiewit/PB staff involved in proposal evaluations is very small. The personnel conducting these evaluations are experienced, which results in adequate and properly documented evaluations.

Item 1(e)

The procedure will be revised to more adequately address the technical review of PO's.

Item I(f)

DR states that paragraph 3.6.3.C needs to address PO's. Procedure will be modified to address actions taken regarding the impact on outstanding PO's due to design changes.

Item 1(g)

DR states that the procedure does not address any procurement action when design documents require a change to procurement documents. Kiewit/PB disagrees with this opinion. Paragraph 3.6.3.C requires QE to notify procurement when changes to existing PO's are required and paragraph 3.6.3.A requires all revisions to PO's be processed the same as the original PO. No deficiency exists.

Item 1(h)

Procedure typographical error will be corrected.

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PR/DR CONTINUATION PAGE

Item 1(i)

The DR states that this section appears to be out of sequence. Kiewit/PB disagrees with this opinion. Paragraph 3.2.3.E states that the PR shall include the requirements for supplier documentation as required by the applicable specification and further instructs the PR originator to refer to paragraph 3.9 (the paragraph in question) for additional information. No deficiency exists.

Items 1(i) and 1(k)

Procedure typographical errors will be corrected.

Item 1(1)

The DR states that the procedure is in conflict with YAP 17.1Q in terms of records turnover. Although Kiewit/PB disagrees with this opinion, we are going to make some changes to the turnover process. Paragraph 4.2 of our procedure states that procurement records will be retained by the procurement department until the end of the fiscal year following the year of PO closeout. At that time procurement prepares the table of contents, as required by YAP 17.1Q, and either "authenticates" for Q orders or "submits" for non-Q. The package is then turned over within 20 days of this authentication date. This practice complies with the requirements of the YAP,

After investigating this process, Kiewit/PB has concluded that we do not need to keep these records as long as originally thought and will revise our procedure to state that procurement will prepare the Table of Contents for authentication or submittal no later that 30 days from closure of the order. The authenticated or submitted packages will then be turned over to the M&O within 20 days from that date. It will still be at the discretion of the procurement department as to when a procurement file is considered closed.

The following are responses to DOE comments regarding MCP 7.1 Rev.7:

Item 2(a)

The DR states that there is no criteria or methodology for implementing the "Technical Verification of Product Produced" method of acceptance. This is a true statement, however, as stated in paragraph 3.9 of the procedure, Kiewit/PB does not anticipate utilizing this method for acceptance of items. This method of acceptance is referenced in the procedure to show that Kiewit/PB has considered all of the acceptance methods as identified in the QARD. Should it become appropriate, in the future, to use this method of acceptance, the procedure will be revised to include applicable criteria and methodology. No deficiency exists.

Item 2(b)

The DR states that, in addition to the RIP, there are other required documents to be placed in the FFP. This is a true statement, however, the procedure section in question (section 3.4) covers RIP development and processing. The content of the FFP is addressed in MCP 4.0. No deficiency exists.

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Item 2(c)

The DR states that there is no methodology for arranging an independent inspection and/or test of the item when the C of C method of acceptance is used. Kiewit/PB disagrees with this opinion. A requirement to "arrange an independent inspection and/or test" is adequately clear and no more detail is required. It should be understood that Kiewit/PB does not use the C of C method of acceptance of Q items. The method is referenced in the procedure to show that all of the acceptance methods as identified in the QARD have been considered. No deficiency exists.

Item 2(d)

Verbal confirmation is obtained by QC from QE of the acceptance of supplier certifications prior to release of the items by QC. A copy of the QE review (exhibit 5.2) is then forwarded to QC for record purposes and another copy along, with the actual supplier certifications, is forwarded procurement for inclusion into the procurement package. Although no deficiency exists, paragraph 3.7.6 will be revised to better define the actual process.

Item 2(e)

Procedure will be revised to include reference to QCP-002 for placement of "Hold" tags.

Item 2(f)

Since the requirements and criteria for the development of a Material Dedication Plan are unique to each specific case, the Dedication Plans will be based on the requirements provided by the design specifications. Procedure will be modified to reflect this position.

Item 2(g)

The statement that "Inspection is performed to the RIP, not to the dedication plan" is true and that is exactly what we do. Any other interpretation of paragraph 3.13.2C is a mis-interpretation. No deficiency exists.

Item 2(h)

The DR states that this paragraph should include supplier's documentation as Lifetime QA Records. This section of the procedure identifies only those Lifetime QA Records which are generated by the procedure. Supplier documentation is not generated by this procedure, however, MCP-4.0 will be revised to include supplier documentation as QA records.

Item 2(i)

The requirement is that the Level II inspector review for acceptability, the entries on the RIP performed by a Level I inspector. The Level II inspector has elected to use a stamp to track the entries of the Level I which he has verified. Since we don't agree that procedures should be reduced to this level of detail, the use of the stamp for this purpose will be discontinued.

Remedial Action response to YMQAD-96-D027

All revisions to MCP-4.0 and MCP-7.1, identified in investigative actions, will be completed by 2/29/96

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Response to YMOAD-96-D027 ITEM 3A

K/PB disagrees that the stated deficiencies exist.

The finding alleges that the manufacturer's published requirements are not controlled. There are two reasons that K/PB disagrees with this statement:

The manufacturer's requirements are "published" for general description and use as supplier catalogs. These are generally available to the public and, normally, do not require "control".

In this case the manufacturer's requirements were a submittal item (02165-VD-04) and are controlled by the submittal process as a specification requirement.

The finding alleges that the published requirements were not "immediately available". Although the finding does not specify where the requirements were not immediately available, a copy is, and has been, immediately available in the K/PB QC Coordinator's office. The QC Coordinator is the person responsible for determining that the test results, reported by the Test Lab, are acceptable.

The finding states that the acceptance criteria "should" have been provided to the Test Lab and/or incorporated into the RIP (Receipt Inspection Plan). Although previous data has been properly reviewed and accepted, we agree to incorporate the acceptance criteria into the applicable RIP for future work. RIP's are in process of being revised and will be completed by 2/15/96.

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1 Controlling Document: Quality Assurance Requirements and Description	ion (QARD), DOE/		2 Related Re YM-ARC-96	
3 Responsible Organization: Kiewit/Parsons Brinckerhoff (Kiewit/PB)		scussed With: Christensen		
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17 Recommended Actions: 1. Provide the methodology and the	havis for extisting the O	ARD requirements into the work or	ocess.
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OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

Performance Report

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Block 5 continued

In addition, the Level-III personnel shall also be capable of evaluating the adequacy of specific programs used to train, qualify, and certify the personnel."

Block 6 continued

e) 3.2.6 Does not provide the methodology of documenting additional education, training, and/or experience.

f) 3.5.1 CA is not tested or certified (see b above)

g) 3.5.7 Agree with no general test being required when associated with a National recognized Certification ASNT TC.1A or AWS D.1.1, Weld Inspection. The Inspector; however, needs to be knowledgeable of YMP specification, drawings, and Kiewit/PB implementing documents.

NOTE: Kiewit/PB has certified Level-I inspectors, the program does not provide for on-the-job training under the direct supervision of a qualified person.

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YMQAD-96-D028

Remedial Actions:

Item 1.a)

MCP-10.1, Paragraph 3.1.1B is not intended to provide the methodology nor basis for determining a candidate's capabilities. It simply lists the capability requirements for Level II inspectors. Paragraph 3.1.2 and Section 3.2 provide the methodology for determining that individuals meet the requirements of Paragraph 3.1.1B. However, to resolve this concern, Section 3.2 will be revised to clearly indicate that the education, experience, and the results of the examination or capability demonstration shall be reviewed and evaluated to determine that the candidate for certification has demonstrated capabilities as defined by Paragraphs 3.1.1A., B., or C. as applicable.

Items 1. b) and f)

MCP-10.1 will be revised to indicate that the Certifying Agent is responsible for the overall control and administration of the Kiewit/PB program for the qualification and certification of inspection and testing personnel. It will further require that persons certifying inspectors shall be themselves certified Level III in the discipline of the person being certified.

It should be noted that the Kiewit/PB Certifying Agent is Certified Level III in RT, UT, MT, PT, Welding Inspection, Civil Inspection, and Construction Inspection. A review has been conducted and it has been verified that all Kiewit/PB inspectors that have conducted QARDrelated inspections have been certified by individuals who were properly certified Level III in the applicable disciplines. Also, Kiewit/PB will assure that no QARD related inspections will be performed by individuals who have not been certified by an appropriately certified Level III. No further evaluation or remedial actions are required.

Item 1.e)

MCP-10.1, Paragraph 3.2.6 states "Should a candidate fail an examination, additional education, training and/or experience, as determined by the Certifying Agent, shall be completed and documented prior to re-examination." MCP-10.1 will be modified to address the method of documenting the additional education, training and/or experience prior to re-examination as determined by the CA.

Item 1.g)

Kiewit/PB agrees that the inspector needs to be knowledgeable in the use of specifications and implementing documents. This is why MCP-10.1, Paragraph 3.5.7B requires the administration of a specific examination in accordance with paragraph 3.2.2B. This, along with the indoctrination and training accomplished in accordance with MCP-2.4, ensures these inspectors are knowledgeable of YMP specifications, drawings, and Kiewit/PB implementing documents.

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Revisions to MCP-10.1 will be completed by February 16, 1996.

Action to Preclude Recurrence:

Personnel responsible for implementing MCP-10.1 requirements will be trained in its new requirements after revision.

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	PERFORMANC	E/DEFICIENCY RE		
1 Controlling Document: MCP-12.0, Revision 9; QAP-12-1, Re	evision 1		2 Related YM-ARC	l Report No. 2-96-03
3 Responsible Organization: M&Gand Kiewit/Parsons Brinckerhof	ff (Kiewit/PB)	4 Discussed With: D. Franks and Jon Ch	ristensen	
5 Requirement/Measurement Criteria:		······································		
Kiewit/PB procedure MCP-12.0, "Con to all tools, gauges, instruments, or oth activities."	. –			
CRWMS M&O procedure QAP-12-1, (Definition), states: Measuring and Te in order to control or acquire data to ve	st Equipment (M&TH	E). Devices or systems u	sed to calibrate	
6 Description of Condition:	·	······································		
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8 Performance Report

NO. <u>YMQAD-96-P-018</u> PAGE <u>65 1</u> QA: L

PR/DR CONTINUATION PAGE

12 Remedial Action

1. The steel set jacking system is considered a commercial item. The jacks are tools used to expand the steel sets into contact with the adjacent rock. There is no special criteria for this function that requires more than a standard commercial system. The jack capacity was selected, from an array of available commercial equipment, so that the force exerted on the steel set members would not exceed design limits. The force allowed is 27 tons, per the specification. The jacks selected are rated at 25 tons (See the attached catalog cut sheet). This system falls under the portion of Section 12 of the QARD that deals with Commercial Device. Quoting from the QARD: "Calibration and control shall not be required for rulers, tape measures, levels and other normal commercial equipment that provides adequate accuracy." The jacks as selected are considered "...normal commercial equipment that provides adequate accuracy."

2. Considering that the jack model numbers and the jack ram diameter have all been verified (See Attachments 1 and 2, IOC and catalog cut respectively), the conditions described in the PR hasbeen adequately addressed considering the function of the jacks.

The final remedial action will be that copies of the Performance Report will be sent to the RPC and that a note will be added to the transmittal to supplement the disposition of NCR No. YMSCO-95-0014.

prjacksa.wp5

ATTACHMENT

Interoffice Correspondence Civilian Radioactive Waste Management System Management & Operating Contractor



TRW Environmental Safety Systems Inc.

Subject PR YMQAD-96-P018 (SCPB: N/A)

To Dana J. Rogers, TES3/423 Date January 16, 1996 LV.ESSB.CRG.1/96-003

cc J. J. Clark, TES3/423 Title III File RPC

WBS: 1.2.6 OA: L From Charles R. Garre

Location/Phone TES3/763 (702) 295-6618

As you requested, today we physically measured the rams of the jacks used underground for steel set installation and reverified that they are Energiac Model RC 2510. 326 446 ...40

The dimensions of the rams using Vernier Calipers measured 2.255 in against the manufacturers' catalog dimension of 2.25 in. This is consistent with the manufacturer's stated tolerances as referenced in the Telecon Report listed as attachment 3 contained in NCR YMSCO 95-00!4.

2.255" 200 2,248 "

NOTE: The colipers used have the number Y11444. They were calibrated 2-16-95 and are due to be calibrated 2-16-96. This information rec'd from C. R. Garrett by telephone on 1-18-96 1-18-

ATTACHMENT 2

Single-Acting, Solid Plunger Hydraulic Cylinders RC Series - 10,000 PSI 15 and 25 Ton Capacities

Applications

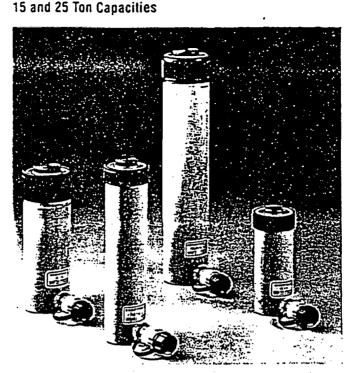
These cylinders can be used in many applications, including in maintenance, production. fabrication and construction They are designed for use in all positions and can be powered by a wide range of Eneroad comps.

Features

- 16 models.
- + includes CR-400 coupler and Just cao.
- · Collar threads enable easy fixturing.
- · Baxed enamel paint finishprovides increased corrosion resistance.
- Soring return.
- · Base mounting holes.
- · Snap-in, removable, procved saddles.

Ordering Information

Refer to the selection chart below for the available models. Many of these cylinders are also available n hand ourno, hose and syndter sets for your prograng conversence (see page 42). Load tokcing /alves (see bage 77) and pressure gauges (see bage 79) are some of the pottonal equipment you may 1.30 need to order



8C-256, RC-158, RC-2514, RC-154

Accessories

Cylinder Saddles

Crinders are succiled standard with grooved saccles, Ail saddles shown in selection chart may be progred separately. CAT-50 tilt saccles prvot 52 have a 2° diam, and protrude th from plunger.



Selection Chart

Nadel Na.	Type Cl Sadala	For Use With Cytinder				
A-152G	Grooved	15 Tan				
A-252G		25 Ton				
CAT-10	÷.	15 Ton				
CAT-50		25 Tan				

Cylinder base for 25 ton

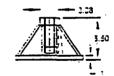


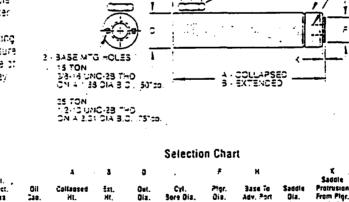


Shown with RC-256)









Mosei No.	Cyl. Cap. (Tons)	Stroke (In.)	Gyl. Effect. Area Sc. in.;	0il 230. (Cu. In.)	Callassed HL. {in.}	£x1. Ht, (In.)	Out. Diz. (in.)	Cyt. Sore Diz. (In.)	<u>Pigr.</u> Dia. (In.)	Base To Adv. Port (in.)	Saddle Dia. {ln.}	Saddle Protrusion From Plgr. jla.)	Pigr. int. Thd. jin.)	Pigr. Tad. Lgth. (in.)	Callar Thd. Lgm. (in.)	Callar Thd.	Weignt {Las.)
RC-151	:5	1.30	:	3.00	4 38,	5 38	2.75	2.20	· 53	75	:.50	.38	•	:	1.13	25 -16	72
152	:5	2.00	2.14	3.50	5.28	7 38	2.75	2.10	1.53	75	1.30	28	·}	1	1.19	24-18	3
RC-154	!5	4 00	::+	- 2.30	7 38	11 38	2.75	2.00	: 33	73	: 50	38	÷-3 j	•	1.13	24 -15	"
RC-156	· 5	5.00	3 • 4	· 3.00	·9 53	13.39	2.75	. 1.30	· 43	· 00	: 50	28	- 3	÷	: .3	3:-19	15
RC-158	• 5	3 00	2.14	25.00	2.59	19 1 9	2.75	2.20	. 33	• :0	: 50	38	1.3	:	1.19	24 -+ 5	• 3
RC-1510	• 5	10.00	3.14	21 50	- 52	24.39	2.75	2.20	: 32	: 20	1 50	36	- - -	1	: :2	2.4	2:
RC-1512	15	2.30	2.14	23,20	15.59	23 39	2.75	2.20	: 53	: 30	: 50	13	1 - 3		÷.)	24 15	24
RC-1514	:5	14 CO	3. 4	0ن شب	13.39	32.33	2.75	2 :00	1 33	:.00	: 50	38	:-3	:	: :2	25 - 15	25
RC-25t	25	: 20	5:5	5 20	5 50	- 1.30	3.08	2.55	2.25	: 20	2.00	÷1	1] • 1 3	:	1,34	374 -12	:3
BC-252	25	2.00	3 5	:0.30	5 SQ	3.30	3.23	2.55	2.25	1.20	2.00	1.11	: •••••	•	: 94	2712	14
RC-254	25	4 30	5.5	21.30	3.50	:2 50	3.38	2.55	2.23	1.30	2.00	41	: • • 15	· •	: 34	354-12	19
RC-256	25	3.25	5	32.29	10.75	17 30	2.38	2.58	2 25	: 20	2.00	41	19419	1	1 34	<u>3% -12</u>	22
1.1.1	25 ·	3.25	5 :5	-2.30	:2.75	21.00	3.28	2.58	2 25	: 20	2.30	41	1 15	:	: 34	3%,+12	27
RC-2510	25	10.25	5.5	32.30	4.75	25.00	5.C	2.56	2.25	1 20	2.00	±1	1945	:	• 34	35-12	31
RC-2512	25	12.25	5.:5	43 CO	18.75	29.00	3 33	2 30	2.25	1.20	2.00	41	1	:	1,94	24 -12	36
RC-2514	25	14 25	5.15	73.50	13.75	33.CO	3.38	2.38	2.25	: 20	2.00	41	1 13	1	1.34	3% -12	39



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QAP 17-1 (Effective 02/20/95)

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0002 (Rev. 01/03/95)

CRWMS/M&O

Fucords Package Table of Contents

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OBJECTIVE EVIDENCE OF COMPLETION OF REMEDIAL ACTION FOR DEFICIENCY YMQAD-96-P-018 (SCPB:N/A)

4. RECORD DATE	5. INDIVIDUAL TITLES/GROUPS OF RECORDS	6. PAGES
01/25/96	TABLE OF CONTENTS	1
01/25/96	LETTER LV.MG.JJC.1/96-009, SEGREST TO SPENCE DATED 01/25/96 YMQAD-96-P-018 DEFICIENCY RESPONSE TRANSMITTAL LETTER	2
01/25/96	PERFORMANCE/DEFICIENCY REPORT FOR YMQAD-96-P-018 INCLUDING BLOCK 12 REMEDIAL RESPONSE: INCLUDES 2 ATTACHMENTS:	4
	ATTACHMENT I-IOC WITH ANNOTATIONS, GARRET TO ROGERS LV.ESSB.CRG.1/96-003	
	ATTACHMENT II-CATALOG CUT SHEET ENTITLED "SINGLE-ACTING SOLID PLUNGER"HYDRAULIC CYLINDERS	
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1 Controlling Document:		2 Related Rep	
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⁸ Performance Report Deficiency Report NO. Y mQrg - % - PO/8 PAGE 2 OF QA: L

PR/DR CONTINUATION PAGE

YMQAD-96-P018

Remedial Actions:

Item 1.

The jacking system employed by Kiewit/PB as discussed in this Performance Report consists of a calibrated pressure gauge and the jack. NCR YMSCO-95-0014 was issued to address the very concern (that <u>both</u> the gauge and the jack needed to be calibrated) stated in this PR. The A/E evaluated the issue and, in the disposition of the NCR, determined that the jacks did not need to be included in the calibration program. Kiewit/PB has complied with this disposition and no discrepancy related to Kiewit/PB activities in this area exists.

8 Performance Report OFFICE OF CIVIL Deficiency Report **RADIOACTIVE WASTE MANAGEMENT U.S. DEPARTMENT OF ENERGY** NO. YMAPP-96-POIR WASHINGTON, D.C. PAGE OF QA: L **PR/DR CONTINUATION PAGE** PR VERICENTEN /CLOSURE the remedial action, intillat of objective indence transmitted by letter L.V. HG. JJC. 1 1/76-011 Caled 1/24/76 was reviewed. this PK is now closed Pit litter 1/30/91 Rev. 07/03/95 Exhibit AP-16.1Q.3

U.S. DEPARTMENT OF ENERGY WASHINGTON, D.C. PAGE or O PERFORMANCE/DEFICIENCY REPORT 2 Related Report No. YMSRC-96-03 1 Controlling Document: QARD. DOERW-0332P, Rev. 5, and MCP-4.0, Rev. 12 2 Related Report No. YMSRC-96-03 3 Responsible Organization: Klewit/Parsons Brankchoff (Klewit/PB) 4 Discussed With: Jon Christensen 5 Requirement/Measurement Criteria: QARD. Section 4.0, Paragraph 4.2.2B, state: "A review of the procurement documents and any changes thereto shall be verify that documents include appropriate provisions to ensure that items and services will meet the governing requirements." MCP - Section 3.0.1, establishes responsibilities for PR/PO approvals. MCP - Section 3.6.3C, states: "QE shall review revisions to specifications for impact on Q-List items covered by Continuar (CU) POs and shall notify the PRM when these specification revisions require changes to the CU contracts." 6 Description of Condition: Contrary to the above cited requirements, the Purchase Requisition (PR) PR A02910 release for Purchase Order 1848-8015 channels was only initiated by the Construction Manager. The other required initials were not obtained. This is a Continuar (Purchase Order 1848-C012). Cortignally, the PR was designated as Non-Q and the Request for Proposal and PO were not reviewed by the technical and QA reviewers. However, the specification changed and there is no evidence that QE notifies PRM for changes to the CU contract. 7 Initiator Domaid J. Harris Date /2-2/-95- QAR <i>Horralel J. Harris</i> 20 Working Dave from Issuance 12 Remetal Actions: Date /2-2/-95- QAR <i>Horralel J. Harris</i> 20 W		FICE OF CIVILIAN		Performanc
PERFORMANCE/DEFICIENCY REPORT 1 Controlling Document: QARD, DO2RW-0333P, Rev. 5, and MCP4.0, Rev. 12 2 Released Report No. YM_ARC-2G-03 3 Responsible Organization: Klewi/Parsons Brinckerhoff (Klewi/PB) 4 Discussed With: Jon Christensen 5 Requirement/Measurement Citterne: QARD - Section 4.0, Paragraph 4.22B, state: "A review of the procurement documents and any changes thereto shall be verify that documents include appropriate provisions to ensure that items and services will meet the governing requirements." MCP - Section 3.1, establishes responsibilities for PR/PO approvals. MCP - Section 3.6.3C, states: "QE shall review revisions to specifications for impact on Q-List items covered by Continue (CU) POs and shall notify the PRM when these specification revisions require changes to the CU contracts." 6 Desemption of Condition: Contrary to the above cited requirements, the Purchase Requisition (PR) PR A02910 release for Purchase Order 1848-8015 channels was only initiated by the Construction Manager. The other required initials were not obtained. This is a Continue turchase Order 1848-CU-012. Originally, the PR was designated as Non-Q and the Request for Proposal and PO were not reviewed by the technical and QA reviewers. However, the specification changed and there is no evidence that QE notifies PRM for changes to the CU contract. 7 Initiator Morting Dave ford 11 QA sequence Approvid QAR PRUACQAM DRA Date /2 QAR PRUACQAM DRA 20 Working Davs form Issuance 11 QA sequence Approvid QAR PRUACQAM DRA Date /2 QAR PRUACQAM DRA Date /2 QAR PRUACQAM DRA <td< th=""><th>U.S. DEI</th><th>PARTMENT OF ENERG</th><th>1</th><th>NO.<u>YMOAD-96</u></th></td<>	U.S. DEI	PARTMENT OF ENERG	1	NO. <u>YMOAD-96</u>
1 Controlling Document: 2 Related Report No. QARD. DOERW-0333P, Rev. 5, and MCP-4.0, Rev. 12 YM - GRC - SG - O3 3 Responsible Organization: 4 Discussed With: Kiewit/Parions Brinckerhoff (Klewit/PB) 4 Discussed With: 5 Requirement/Measurement Criteria: 4 Discussed With: QARD - Section 4.0, Paragraph 4.2.25, state:: "A review of the procurement documents and any changes thereto shall be wrify that documents include appropriate provisions to ensure that items and services will meet the governing requirements." MCP - Section 3.1, establishes responsibilities for PR/PO approvals. MCP - Section 3.6.3C, states: "QE shall review revisions to specifications for impact on Q-List items covered by Continue (CU) POs and shall notify the PRM when these specification revisions require changes to the CU contracts." 6 Description of Condition: Contrary to the above cited requirements, the Purchase Requisition (PR) PR A02910 release for Purchase Order 1848-8015 Contrary to the above cited requirements, the Purchase Requisition changed and there is no evidence that QE notifier the reviewed by the technical and QA reviewer. However, the specification changed and there is no evidence that QE notifier PRM for changes to the CU contract. 7 Initiator Date /2-21-95- 10 Response Due Date Date /2-21-95- 20 Working Davs from Issuance Date /2-21-95- 12 Remedial Actions: The required approvals of subject non-Q	PERFORMA			<u>u</u>
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QARD - Section 4.0, Paragraph 4.2.2B, states: "A review of the procurement documents and any changes thereto shall be writy that documents include appropriate provisions to ensure that items and services will meet the governing requirements." MCP - Section 3.1, establishes responsibilities for PR/PO approvals. MCP - Section 3.6.3C, states: "QE shall review revisions to specifications for impact on Q-List items covered by Continue (CU) POs and shall notify the PRM when these specification revisions require changes to the CU contracts." 6 Description of Condition: Contrary to the above cited requirements, the Purchase Requisition (PR) PR A02910 release for Purchase Order 1848-8015 Contrary to the above cited requirements, the Purchase Requisition (PR) PR A02910 release for Purchase Order 1848-8015 Purchase Order 1848-CU-012. Originally, the PR was designated as Non-Q and the Request for Proposal and PO were not reviewed by the technical and QA reviewers. However, the specification changed and there is no evidence that QE notified PRM for changes to the CU contract. 7 Initiator Donald J. Harris Date /2-21-95- QA Review 20 Working Dave from Issuance 11 GA issuance Approval Date /2 12 Remedial Actions: The required approvals of subject non-Q Purchase Request have been obtained. QE has notified procurement of the need to review the existing CU contract due to specification changes. The notification, however, was performed verbally. In the future, QE notifications to procurement will be handled by memo. The QE review did not result in any changes to the CU contract. No further remedial action is req			1 mane	<u> </u>
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W	ASHINGTON, D.C.	PAGE 1
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	ANCE/DEFICIENCY REPO	
1 Controlling Document: Quality Assurance Requirements and Description (QA	ARD), DOE/RW-0333P, Rev. 5	2 Related Report No. · YM-ARC-96-03
Responsible Organization:	4 Discussed With:	
Kiewit/Parsons Brinckerhoff (Kiewit/PB)	Jon Christensen	
Requirement/Measurement Criteria:		
QARD, Section 5.0, Paragraph 5.2.2, states in part: Implementing documents shall include the following it	information as enoron-inte to the	work to be performed
A. Responsibilities and organizational interfaces of the		
3. A sequential description of the work to be performed		
and other operations."		
ARD, Section 2.0, Paragraph 2.2.10, states in part:	•	
Implementing documents and documents that specify	technical or quality requirements	shall be reviewed to the follow
equirements:	• • •	2,
A. Review criteria shall be established before perform	ing the review.	(Contd. on Page/5)
Description of Condition: Contrary to the above, MCP-2.0, Revision 13 does not	•	`
. Adequately define the responsibilities of the Constru-		
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the work to be performed as it relates to the initiation		
the work to be performed as it relates to the initiation. Define the interface between MCP-2.0 and MCP 10	on and preparation of the Work Pa	ckage.
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PR/DR CONTINUATION PAGE

Block 5 continued

C. The review shall be performed by individuals other than the preparer.

E. The scope of the review shall consider all aspects of the document.

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1. Each organization or technical discipline affected by the document shall review the document according to the established review criteria. Changes to the document..."

QARD, Section 17.0, Paragraph 17.2.2.A, states: "Implementing documents shall: 1. Identify those documents that will become QA Records."

Block 6 continued

5. The generation of records by the WPD is not addressed. WPD 2.20.3, Revision 4, "TBM Excavation - North Ramp," controls the generation of records that provide objective evidence for TCP-2.3.

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PR/DR CONTINUATION PAGE

Block 12 - Remedial Actions - Continued

- 1&2 The roles of the CM and QCM shall be clarified in MCP-2.0. The work package requirements addressed in MCP-10.0 will be incorporated into MCP-2.0 and reference to MCP-10.0 will be deleted. MCP-10.0 will also be reviewed and revised to incorporate any required changes.
- 3.&4 MCP-2.0 will be revised to require Construction, QC and ES&H review of initial issuance and all revisions of Work Packages. New Work Package Review Checklists will be prepared for any revisions made to the WPD, Traveler or Supplemental Travelers and will be signed by the CM, QCM, and ES&H Manager. The Master Approval Sheet has also been revised to indicate the signature requirements for ES&H. WPDs will not be approved other than through the checklist and MAS.

MCP-2.0 will be revised to enforce the above review process. All past segments will be evaluated to identify missed revisions and will be reviewed in accordance with the above. Training will occur for all applicable personnel to the new procedure.

5. Records should not be generated by the WPD. A review of WPDs will be performed to eliminate any record generation requirement and in those cases where records are not covered by other implementing documents, provisions will be made to incorporate the requirement in the applicable implementing documents of, if required, new implementing documents prepared.