



**Department of Energy**

Nevada Operations Office  
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WBS #1.2.9.3  
"QA"

**JUN 22 1989**

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Technical Project Officer for Yucca Mountain Project  
Reynolds Electrical &  
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P.O. Box 98521  
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CLOSURE OF STANDARD DEFICIENCY REPORT (SDR) 188, REVISION 0, RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE QUALITY ASSURANCE AUDIT 88-7 OF REYNOLDS ELECTRICAL & ENGINEERING CO., INC.

SDR 188, Revision 0, has been closed based on satisfactory verification of completed corrective action. A copy of the SDR is enclosed for your files.

If you have any questions, please contact Wendell B. Mansel of my staff at 794-7945 or Stephen P. Hans of Science Applications International Corporation at 794-7165.

Edwin L. Wilmot, Acting Director  
Quality Assurance Division  
Yucca Mountain Project Office

YMP:WBM-4531

Enclosure:  
SDR 188, Revision 0

cc w/encl:  
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Dwight Shelor, HQ (RW-3) FORS  
M. A. Fox, REECO, Las Vegas, NV  
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# WMPO STANDARD DEFICIENCY REPORT

N-QA-038  
3/87

Completed by Originating QA Organization	1 Date		2 Severity Level <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 2
	3 Discovered During AUDIT 88-7		3a Identified By S. Dana/J. Clark		3b Branch Chief Concurrence Date
	5 Organization REECO		6 Person(s) Contacted Bob Lyken		7 Response Due Date is 20 Working Days from Date of Transmittal
	4 SDR No. 188 Rev. 0				
Completed by Organization in Block 5	8 Requirement (Audit Checklist Reference, if Applicable) (Audit checklist item N/A) REECO QAPP 568-DOC-115, R5, Section V-1.0 states in part, "Activities affecting quality shall be prescribed by and performed in accordance with documented instructions, procedures, plans or drawings, of				
	9 Deficiency Contrary to the requirements stated above, the QA administrative procedures (NQPs) governing REECOs performance of NNWSI Project quality affecting work do not include or reference appropriate quantitative or qualitative acceptance				
	10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective 1) Develop an NQP governing the preparation, review, approval and issuance of NQPs which establishes a flow sequence for actions and assigns				
	11 QAE/Lead Auditor Date <i>Shelton 9/6/88</i>		12 Branch Manager Date <i>Bob Lyken SEP 06 1988</i>		13 Project Quality Mgr. Date <i>Roger Marks 9/9/88</i>
Comp. by Orig. QA Org.	14 Remedial/Investigative Action(s)				
	15 Effective Date _____				
	16 Cause of the Condition & Corrective Action to Prevent Recurrence Recommended Actions 1-4 (See attached response)				
	17 Effective Date <u>1 Dec 1988</u>				
Comp. by Orig. QA Org.	18 Signature/Date <i>Mono 10/5/88</i>				
	19 Response <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject <input checked="" type="checkbox"/> Amended Response		QAE/Lead Auditor/Date <i>Shelton 11/18/88</i>		Branch Manager/Date <i>Bob Lyken 11/18/88</i>
	20 Amended Response <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject		QAE/Lead Auditor/Date <i>Shelton 2/27/89</i>		Branch Manager/Date <i>Bob Lyken 28 Feb 89</i>
	21 Verification <input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory		QAE/Lead Auditor/Date <i>Shelton 6/12/89</i>		Branch Manager/Date <i>Bob Lyken 12 Jun 89</i>
22 Remarks All Quality Procedures (QPs) have been revised as necessary to include qualitative and quantitative acceptance criteria as required by the QAPP and this has been verified by the surveillance team. The detailed procedures that are used by the other REECO departments to perform work are in place, but do not meet the QA Program requirements. Since REECO's scope of work activities (Continued on attached sheet)					
23 QA CLOSURE		QAE/Lead Auditor/Date <i>Shelton 6/12/89</i>	Branch Manager/Date <i>Bob Lyken 12 Jun 89</i>	PQM/Date <i>For 6/13/89</i>	

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ENCLOSURE

SDR-188

Remarks: (Continued)

has not yet been defined, the revision of the detailed procedures is being deferred. At such time as detailed procedures are developed, they will be controlled by QP 5.1, 5.2 and 5.3. These controlling procedures require qualitative and quantitative criteria.



**8 Requirement ( continued )**

a type appropriate to the circumstances. These documents shall include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished....These documents, including drawings, shall be controlled as required in Section VI of this document [QAPP]."

Section VI-1.1 states in part, "The preparation, review, approval and issuance of documents...shall be controlled through the implementation of methods that assure that only correct documents are used."

Section VI-1.2 states in part, "Implementation of document control shall provide for the following:

- \* Identification of assignment of responsibility for preparing, reviewing, approving and issuing documents.

**9 Deficiency ( continued )**

criteria for determining that prescribed activities have been satisfactorily accomplished. In fact, the NQPs do not specify or describe the way in which the activities are to be performed, as required by the definition of "procedure" in Appendix A of the REECo QAPP.

**10 Recommended Actions ( continued )**

responsibilities for those actions.

- 2) Establish review criteria for NQPs to ensure that a method for conducting the activity exists within the NQP before its approval.
- 3) Revise all NQPs as necessary to specify or describe a method for performing the activity which is compliant to requirements in the QAPP.
- 4) Evaluate lower tier implementing procedures for all REECo departments performing NNWSI Project work and ensure that procedures comply with the governing NQP.

WMPO STANDARD DEFICIENCY REPORT

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BLOCK 16

1. A procedure will be developed which governs the preparation, review, approval and issuance of procedures.
2. Review criteria for procedures will be established in the procedure to be developed.
3. All NQP's will be revised as necessary to specify or describe the method of performing the activity and which meets the requirement of the QAPP.
4. Implementing procedures for all departments performing YMP activities will be evaluated against the governing procedure.

YMP/AUDIT 88-07  
AMENDED RESPONSE

SDR 187. Revision 0

Block 16 - The "cause" for the proposed corrective action was the lack of a REECo training plan/procedure. REECo has issued Procedure AP2.0, Training, in accordance with the DOE/YMP Training Plan 88-16.

SDR 188. Revision 0

Block 14 - AP1.0, Procedure Preparation has been developed.

Block 15 - 1/3/89

Block 16 - Lack of a procedure governing the preparation, review, and appearance of procedures was the "cause" for the required corrective action.

SDR 189. Revision 0

Block 15 - 10/5/88

Block 16 - The cause for required corrective action was the lack of QA staff or others qualified within the organization which precluded an independent review of the Quality Assurance Administrative Procedures (NQPs). The current increase in QA staff has resolved this problem within REECo. A review of all NQPs was made during revision to meet the requirements of YMP/88-9, Rev. 2, and their change to YMP QPs. A review of other REECo implementing procedures has been conducted and it was found that departmental implementing procedures pass through various stages of review, but for in all cases has this review been documented. Direction has been given to all departments of the need for objective evidence of procedure review. This will be assessed in future surveillances and audits.

SDR 190. Revision 0

When NQPs were revised to QPs, the requirement was addressed that QPs and implementing procedures do identify which QA records are generated. There have been no QA Level I or II records to be processed except for the procurement package of the Mine Hoist for ES-2, which has been done.

Block 16 - Cause was due to lack of understanding of the requirement which the audit teams clarified.

Block 15 - 1/13/89 - Issuance of QPs to YMP/88-9, Rev. 2.