



## Department of Energy

Nevada Operations Office  
P. O. Box 98518  
Las Vegas, NV 89193-8518

WBS 1.2.9.3  
QA

OCT 30 1989

Thomas O. Hunter  
Technical Project Officer for Yucca Mountain Project  
Sandia National Laboratories  
P.O. Box 5800  
Organization 6310  
Albuquerque, NM 87185

CLOSURE OF STANDARD DEFICIENCY REPORT (SDR) 032, REVISION 1, RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE QUALITY ASSURANCE AUDIT 87-5 OF SANDIA NATIONAL LABORATORIES

SDR 032, Revision 1, has been closed based on satisfactory verification of completed corrective actions. A copy of the SDR is enclosed for your files.

If you have any questions, please contact James Blaylock of my staff at (702) 794-7913 or FTS 544-7913, or E. Paul Bryant of Science Applications International Corporation at (702) 794-7851 or FTS 544-7851.

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

YMP:JB-469

Enclosure:  
SDR 032, Revision 1

cc w/encl:

Ralph Stein, HQ (RW-30) FORS  
D. E. Shelor, HQ (RW-3) FORS  
R. R. Richards, SNL, Albuquerque, NM  
J. J. Brogan, SAIC, Las Vegas, NV, 517/T-12  
K. A. Hodges, SAIC, Las Vegas, NV, 517/T-06  
J. H. Nelson, SAIC, Las Vegas, NV, 517/T-04  
S. W. Zimmerman, NWPO, Carson City, NV  
J. E. Kennedy, NRC, Washington, DC

cc w/o encl:

J. H. Hines, NWQA, AL  
A. L. Temple, SAIC, Las Vegas, NV, 517/T-38  
J. W. Gilray, NRC, Las Vegas, NV

8911060068 891030  
PDR WASTE  
WM-11 PDC

FULL TEXT ASCII SCAN

102.7  
WM-11  
NH03.1

# WMPO STANDARD DEFICIENCY REPORT

N-QA-038  
3/87

Completed by Originating QA Organization

Completed by Organization in Block 5

Comp. by Orig. QA Org.

1 Date <u>2/2/88</u>		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 1	
3 Discovered During <u>WMPO Audit 87-5</u>		3a Identified By <u>G. Dymmel/ G. Heaney</u>		3b Branch Chief Concurrence Date <u>N/A</u>	
4 SDR No. <u>032</u>		Rev. <u>1</u>			
5 Organization <u>SNL</u>		6 Person(s) Contacted <u>R. Richards</u>		7 Response Due Date is 20 Working Days from Date of Transmittal	
8 Requirement (Audit Checklist Reference, if Applicable) 1) See original SDR 2) Corrective actions must be completed by effective dates specified or extension obtained.					
9 Deficiency 1) See original SDR 2) Non responsive to committed corrective action within specified time.					
10 Recommended Action(s): <input type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective 1) Complete committed corrective actions. 2) Determine cause for "non responsiveness" to committed corrective actions and corrective action to preclude recurrence.					
11 QAE/Lead Auditor Date <u>FEB 03 1988</u>		12 Branch Manager Date <u>2/3/88</u>		13 Project Quality Mgr. Date <u>2/3/88</u>	
14 Remedial/Investigative Action(s)  15 Effective Date <u>Complete</u> An evaluation was conducted to the cause of "non-responsiveness" to committed corrective actions. The results of this evaluation are provided below. a) The original effective date for remedial/investigative action was missed due to lower reprioritization of these actions in order to accomplish SCP-related					
16 Cause of the Condition & Corrective Action to Prevent Recurrence  17 Effective Date <u>April 15, 1988</u> The cause of "non-responsiveness" to original due dates was reprioritization of actions (a normal management function which requires no corrective action) and poor attention to details in providing objective evidence of completed actions.					
18 Signature/Date <u>R.R. Richards</u> <u>Mar. 17, 1988</u> <u>R.R. Richards, SNL NNWSI QA Coordinator</u>					
19 Response <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Amended Response		QAE/Lead Auditor/Date <u>G. Heaney 9-9-88</u>		Branch Manager/Date <u>R. Richards 9 Sept 88</u>	
20 Amended Response <input type="checkbox"/> Accept <input type="checkbox"/> Reject		QAE/Lead Auditor/Date		Branch Manager/Date	
21 Verification <input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory		QAE/Lead Auditor/Date <u>G. Heaney 10-17-89</u>		Branch Manager/Date <u>Blaylock 10/19/89</u>	
22 Remarks <u>Revised response was received on 6-3-88 (See SNL letter R. Richards to J. Blaylock dtd. 6/3/88). acceptance of revised response per WMPO letter YMP: JB-130 dtd. 10/10/88.</u>					
23 QA CLOSURE		QAE/Lead Auditor/Date <u>G. Heaney 10-17-89</u>		Branch Manager/Date <u>Blaylock 10-19-89</u>	
		PQM/Date <u>James Blaylock 10/19/89</u>			

ENCLOSURE

Investigative Action(s) (Cont'd.)

activities, as well as lack of clarity during September-November 1987 concerning the Project's calibration policy.

- b) A response intended to address these remedial and investigative actions, the root cause, and corrective actions was submitted from SNL to the WMPO on November 6, 1987. This response was not clearly linked to this SDR, Rev.0, however.
- c) A letter which explained the linkage between the November 6 submittal and the SDR was submitted to the WMPO from SNL on December 23, 1987. It was concluded that the facts stated in both the November 6 and December 23 letters were not supported by adequate objective evidence. Resultant corrective action is stated in Block 16.

Cause of the Condition and Corrective Action (Cont'd.)

General corrective action concerning non-responsiveness will consist of specific screening of SDR/NCR close-out requests by the SNL NNWSI QA staff for inclusion of adequate objective evidence of all completed actions.

Corrective action concerning the original remedial/investigative actions for this SDR will consist of assembling and submitting objective evidence that summarizes the review of past and current QA Level I or II activities and the evaluation of the impact of data collected therein, by the date shown in Block 17.

ATTACHMENT TO SDR NO. 032, REV. 1

Block 22 Remarks (cont'd)

The following corrective actions were verified to be completed:

- 1) Sandia initiated nonconformance report (NCR) no. SNL-88-2 and later added an addendum. The NCR provides the identification of the activity by which any quality level I or II data was collected and the identification, serial, and Primary Standards Laboratory (PSL) control number of the instrument used to collect the data. This information was requested by the Project Office (refer to letters, Gertz to TPO's, dtd. 9/1/87 and Gertz to TPO's, dtd. 9/1/88). The information contained within the addendum was compiled by EG&G Energy Measurements.
- 2) The Project Office QA staff reviewed calibration records at EG&G to ensure traceability to PSL control numbers. The review verified that EG&G calibration records are traceable to PSL control numbers (refer to attached memo to file, Project Office letter no. YMP:JB-286, dtd. 10/17/89).

The Project Office will utilize a sample of the PSL control numbers provided in the addendum to the Sandia NCR in a planned surveillance of the PSL. The objective of the surveillance will be to verify that PSL calibration files are traceable to the National Institute of Standards and Technology or other nationally recognized standards. These efforts are being performed as corrective actions associated with SDR No. 102, Rev. 0. This SDR No. 032, Rev. 1 is closed.

# Sandia National Laboratories

Albuquerque, New Mexico 87185

June 3, 1988

ATTACHMENT 1 TO  
SDR NO 032 REV. 1  
Pg 2 OF 11

James Blaylock  
Waste Management Project Office  
U.S. Department of Energy  
Nevada Operations Office  
P.O. Box 98518  
Las Vegas, Nevada 89193-8518

Dear Jim:

Subject: Request for Extension and Revised Corrective Action for SDR 032

Because the due date specified in our response to SDR 032, Rev. 1, has passed, an extension to that due date is requested. We expect that this SDR can be closed out upon the approval of the revised corrective action stated below.

The subject SDR concerns the traceability of calibrations to the NBS or other nationally recognized standards and is closely related to investigations initiated by WMPO letter JB:2593 dated September 1, 1987. In pursuing the evaluation called for by the corrective action of SDR 032, Rev. 1, we determined that we were duplicating efforts of Jerry Heaney of SAIC, who is pursuing the calibration issue at the Project level. Additionally, many of the records we needed to review are held by EG&G Energy Measurements in Las Vegas who, as a DOE contractor, is more accessible to DOE representatives than to SNL. The above facts convinced us that a more effective and efficient resolution of the question of validity of measurements from instruments traceable through the Primary Standards Lab would result from corrective action like that specified in the WMPO letter mentioned above.

Consequently, we request approval of a revision to the corrective action specified in SDR 032, Rev. 1. Specifically, we request that the last paragraph of that corrective action ("Corrective action concerning...shown in Block 17.") be replaced in its entirety by:

"Perform a review to determine if the calibration traceability of instruments used for any Quality Level I or II data collection activities includes the SNL Primary Standards Lab in that chain.

NNA 880609.0028

J. Blaylock

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ATTACHMENT 1 TO  
SDR NO. 032 REV. 1  
June 3, 1988  
Pg. 3 OF 11

Initiate a Nonconformance Report (NCR) for any such cases. The NCR will include the identification of the data collection activity, the data collected, the instrument(s), and any documents in which the data was published.

This SDR shall be closed out upon initiation of any needed NCRs, since control of the unresolved situation will then exist within the NCR system."

Assuming acceptance of the above revised corrective action (as has been coordinated with Henry Caldwell), an NCR as specified above is attached, as objective evidence allowing you to close out SDR 032. Because this is a Q-Level I NCR, WMPO approval of the resolution is requested.

Sincerely,



Robert R. Richards  
QA Coordinator  
NNWSI Project Department 6310

RRR:6310:mjh  
Attachment

Copy to:  
SAIC H. H. Caldwell  
SAIC J. J. Brogan  
6310 T. O. Hunter  
6310 R. R. Richards  
6310 90/1293/AUD/WMPO87/Q1  
6310 90/1293/NCR/Q1 (XREF)  
6310 NNWSICF

SAIC 6310

JUN 09 1988

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