



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Reply to:
1050 East Flamingo Rd.
Suite 319
Las Vegas, Nevada 89119
Tel: (702) 388-6125
FTS: 598-6125

TO: Mr. James E. Kennedy
FROM: Paul T. Prestholt, Sr. On-Site Licensing Representative
DATE: December 4, 1987
SUBJECT: H&N RESPONSES TO WMPD SURVEILLANCE NO. WMPD-SR-87-020
OBSERVATIONS, AND WMPD AUDIT NO. 87-2 OBSERVATIONS;
WMPD EVALUATION OF REECO RESPONSES TO THE QA SDRS AND
OBSERVATIONS RESULTING FROM WMPD QA AUDIT 87-100 OF
REECO; WMPD EVALUATION OF LANL AMMENDED RESPONSES TO
THE QA SDRS RESULTING FROM AUDIT 87-1 OF LANL

Please find the above-referenced information for your files.

FTP:nan

15/

88147547
WM Project: WM-11
PDR w/encl
(Return to WM, 623-55)

WM Record File: 102.7
LPDR w/encl

H

8803240243 871204
PDR WASTE
WM-11 PDR



Department of Energy

Post Office Box 98518
Las Vegas, NV 89193-8518

NOV 30 1987

James P. Pedalino
Technical Project Officer for NNWSI
Holmes & Narver, Inc.
101 Convention Center Drive
Suite 860
Las Vegas, NV 89109

HOLMES & NARVER, INC. (H&N) RESPONSES TO WASTE MANAGEMENT PROJECT OFFICE (WMPO)
SURVEILLANCE NO. WMPO-SR-87-020 OBSERVATIONS

Reference: Letter, Pedalino to Blaylock, dtd. 8/25/87

The WMPO has received the H&N responses to Surveillance WMPO-SR-87-020 Observations 1 and 2. The responses have been evaluated and found to be acceptable. The actions outlined in your responses to Observations 1 and 2 will serve as reference points for future WMPO audit/surveillance activities.

If you have any questions, please contact me at 295-8913.

James Blaylock
James Blaylock
Project Quality Manager
Waste Management Project Office

WMPO:JB-562

cc:

V. J. Cassella, HQ (RW-222) FORS
J. P. Knight, HQ (RW-24) FORS
A. E. Gurrola, H&N, Mercury, NV
Richard Ivy, H&N, Mercury, NV
C. O. Wright, H&N, Mercury, NV
S. H. Klein, SAIC, Las Vegas, NV
W. R. Kazor, SAIC, Las Vegas, NV
R. H. Klemens, SAIC, Las Vegas, NV
J. J. Brogan, SAIC, Las Vegas, NV
P. T. Prestholt, NRC, Las Vegas, NV
R. W. Gray, MED, NV
V. F. Witherill, NTSO, NV
A. R. Veloso, NTSO, NV
J. R. Rinaldi, QAD, NV
M. P. Kunich, WMPO, NV





Department of Energy

Post Office Box 98518
Las Vegas, NV 89193-8518

NOV 30 1987

James P. Pedalino
Technical Project Officer for NNWSI
Holmes & Narver, Inc.
101 Convention Center Drive
Suite 860
Las Vegas, NV 89109

HOLMES & NARVER (H&N) RESPONSES TO WASTE MANAGEMENT PROJECT OFFICE (WMPO) AUDIT NO. 87-2 OBSERVATIONS

The WMPO has received the H&N responses to Audit 87-2 Observations 1 through 5. The responses have been evaluated and found to be acceptable. The actions outlined in your responses to Observations 1 through 5 will serve as reference points for future WMPO audit activities.

If you have any questions, please contact me at 295-8913.

James Blaylock

James Blaylock
Project Quality Manager
Waste Management Project Office

WMPO:JB-560

cc:

V. J. Cassella, HQ (RW-222) FORS
J. P. Knight, HQ (RW-24) FORS
A. E. Gurrola, H&N, Mercury, NV
Richard Ivy, H&N, Mercury, NV
C. O. Wright, H&N, Mercury, NV
S. H. Klein, SAIC, Las Vegas, NV
W. R. Kazor, SAIC, Las Vegas, NV
R. H. Klemens, SAIC, Las Vegas, NV
J. J. Brogan, SAIC, Las Vegas, NV
B. A. Wozniak, SAIC, Las Vegas, NV
P. T. Prestholt, NRC, Las Vegas, NV
R. W. Gray, MED, NV
V. F. Witherill, NTSO, NV
A. R. Veloso, NTSO, NV
J. R. Rinaldi, QAD, NV
M. P. Kunich, WMPO, NV





Department of Energy

Post Office Box 98518
Las Vegas, NV 89193-8518

DEC 1 1987

Vincent Gong
Technical Project Officer for NNWSI
Reynolds Electrical & Engineering Co., Inc.
Mail Stop 615
P.O. Box 98521
Las Vegas, NV 89193-8521

WASTE MANAGEMENT PROJECT OFFICE (WMPO) EVALUATION OF REYNOLDS ELECTRICAL AND ENGINEERING COMPANY, INC. (REECO) RESPONSES TO THE QUALITY ASSURANCE (QA) STANDARD DEFICIENCY REPORTS (SDRS) AND OBSERVATIONS RESULTING FROM WMPO QA AUDIT 87-10 OF REECO (WMPO ACTION ITEM #88-503)

Reference: (1) Letter, Gong to Blaylock, dtd. 10/28/87
(2) Letter, Gong to Blaylock, dtd. 10/15/87

The WMPO has evaluated the REECO responses to the seven SDRs (Nos. 074-080) and the three observations that required response, which were generated as a result of WMPO QA Audit 87-10 of the REECO Nevada Nuclear Waste Storage Investigations (NNWSI) Project QA Program. A summary of the evaluations for each SDR and observation is listed below. The WMPO requires an amended response for SDR NO. 074. The response to SDR No. 078 is rejected. You are requested to provide an amended response to SDR No. 074 and a response to Rev. 1 of SDR No. 078, which is enclosed with this letter, to my office within 20 working days of the transmittal date of this letter. Concurrently you are requested to send the original of these responses to Nita J. Brogan of Science Applications International Corporation, Las Vegas, Nevada. The SDRs which had acceptable responses will be closed upon verification of committed corrective action.

SDR-074, Rev. 0

The WMPO does not agree with your response that the SDR is in error in several respects and that the finding is not valid. If the REECO Company Procedure 4.7.1 is not clear in defining the word "results" or its intent, the procedure is open to interpretation. Perhaps a better written procedure would have given a clear interpretation of its intent. Additionally, REECO was given a copy of the SDRs at the audit exit meeting and a request was made to inform the audit team if the SDRs were in error and should not be issued. With no negative response at the exit meeting or within the following three weeks after the meeting, the SDRs were issued.



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The WMPO requests an amended response to the SDR providing:

1. Identification of the new procedures issued as of August 18, 1987 which contain the requirements to document "As-found conditions."
2. Copies of the documentation for the indoctrination and training that was performed August 28, 1987.
3. A description of the administrative review that was performed two weeks following the indoctrination and training session and also at six and ten week intervals. Is this review documented as an NNWSI Project QA Record?
4. Information regarding any regularly scheduled audits that have been performed since the WMPO audit to verify the investigation of "as-found conditions" on audit checklists.

SDR-075, Rev. 0

The response is acceptable. The SDR will be closed upon satisfactory verification of committed corrective actions, which are due to be completed November 25, 1987.

SDR-076, Rev. 0

The response is acceptable. The SDR will be closed upon satisfactory verification of committed corrective actions, which are due to be completed November 25, 1987.

SDR-077, Rev. 0

The response is acceptable. The SDR will be closed upon satisfactory verification of committed corrective actions, which are due to be completed by November 25, 1987.

SDR-078, Rev. 0

The response provided is unacceptable for the following reasons:

1. The SDR is a valid finding as the requirements are directly from the REECO NNWSI Project Quality Operations Procedure NQP 18.1 "Qualification and Certification of Quality Assurance Audit Personnel," Rev. 0, Paragraph 2A which are based on NNWSI Project QAP NVO-196-17 requirements.

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2. The response stated that Stone and Webster does not have documentation concerning audits conducted or participated in by your lead auditor. The copy of the Stone and Webster letter provided with the response states that records do not show your lead auditor participated in any Stone and Webster audits. The response provided reiterates the deficiency.

What audits is REECo referring to which have been turned over to client utility companies?

3. Your position that the certification issued to your lead auditor is adequate because it attest to the fact that he met the requirements of lead auditor for nuclear power plants by Stone and Webster and client users is unfounded. No objective evidence was provided that he met the lead auditor requirements of nuclear power plants which are the same for the Nuclear Waste Program based on NQA-1 requirements.

SDR-079, Rev. 0

The response is acceptable. The SDR will be closed upon satisfactory verification of committed corrective actions.

SDR-080, Rev. 0

The response is acceptable. The SDR will be closed upon:

1. Satisfactory verification of committed corrective actions which are due to be completed November 25, 1987.
2. Satisfactory demonstration that the nonconforming conditions which were reported as observations in REECo surveillance reports, have been responded to and corrective action measures have been initiated.

Observation No. 1

The WMPO concurs with the response provided.

Observations No. 2

The WMPO concurs with the response provided.

Observation No. 3

A response from REECo was not required.

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Observation No. 4

The WMPO concurs with the response provided.

Additionally, the WMPO offers the following evaluation of the response to Recommendation No. 1, which REECO elected to respond to.

Recommendation No. 1

The WMPO agrees with REECO's action to add the revision number to its calibration and other internal procedures. However, we do not agree that our recommendation is not founded on any requirements. It is pointed out that the NNWSI Project QAP NVO-196-17, Rev. 5 Section VI "Document Control," Paragraph 1.2 states in part "Implementation of document control shall provide for the following: a master list or equivalent or identify the correct and updated revisions of documents."

If you have any questions, please contact me at 295-8913.

James Blaylock

James Blaylock
Project Quality Manager
Waste Management Project Office

WMPO:JB-535

Enclosure:
SDR NO. 078, Revision 1
w/attachment

cc w/encl:

V. J. Cassella, HQ (RW-222) FORS
J. P. Knight, HQ (RW-24) FORS
M. M. Azhikakath, REECO, Mercury, NV
M. A. Fox, REECO, Mercury, NV
S. H. Klein, SAIC, Las Vegas, NV
W. R. Kazor, SAIC, Las Vegas, NV
Gerard Heaney, SAIC, Las Vegas, NV
J. J. Brogan, SAIC, Las Vegas, NV
B. A. Wozniak, SAIC, Las Vegas, NV
Daniel Klimas, SAIC, Las Vegas, NV
P. T. Prestholt, NRC, Las Vegas, NV
R. W. Gray, MED, NV
J. R. Rinaldi, QAD, NV
V. F. Witherill, NTSO, NV
A. R. Veloso, NTSO, NV
L. P. Skousen, WMPO, NV
M. B. Blanchard, WMPO, NV
W. R. Dixon, WMPO, NV
C. P. Gertz, WMPO, NV
M. P. Kunich, WMPO, NV

WMPO STANDARD DEFICIENCY REPORT

N-QA-038
3/87

Completed by []
Completed by Originating QA Organization []
Completed by Organization in Block 5 []
Completed by Orig. QA Org. []

| | | | | | | | | |
|---|------------------|--|---|---|-----------------------|--|---------------------|--|
| 1 Date | 11-4-87 | | 2 Severity Level | <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 | | Page | 1 of 2 | |
| 3 Discovered During | 3a Identified By | | 3b Branch Chief | | 4 SDR No. | | Rev. | |
| WMPO Audit 87-10 | D. Klimas | | N/A | | 078 | | 1 | |
| 5 Organization | | | 6 Person(s) Contacted | | | 7 Response Due Date is | | |
| REECO | | | M. Fox | | | 20 Working Days from Date of Transmittal | | |
| 8 Requirement (Audit Checklist Reference, if Applicable) REECO NNWSI Quality Operations Procedure NQP 18.1, "Qualification and Certification of Quality Assurance Audit Personnel", Rev. 0, Para. 2A states "Audit Participation - the prospective lead auditor shall have participated (cont'd) | | | | | | | | |
| 9 Deficiency Contrary to the above requirement, there was no objective evidence of the performance of five audits in three years for lead auditor Bob Lykens. Note: Currently he is the only certified lead auditor within REECO. | | | | | | | | |
| 10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input type="checkbox"/> Investigative <input type="checkbox"/> Corrective | | | | | | | | |
| 1) Acquire objective evidence of required audit participation. | | | | | | | | |
| 2) Reinstruct appropriate personnel to procedural requirements. Provide objective evidence with response to the SDR. | | | | | | | | |
| 11 QAE/Lead Auditor Date | | | 12 Branch Manager Date | | | 13 Project Quality Mgr. Date | | |
| D. Heenan 11/5/87 | | | [Signature] 11/6/87 | | | J. Blaylock 1/9/87 | | |
| 14 Remedial/Investigative Action(s) | | | | | | | | |
| 15 Effective Date _____ | | | | | | | | |
| 16 Cause of the Condition & Corrective Action to Prevent Recurrence | | | | | | | | |
| 17 Effective Date _____ | | | | | | | | |
| 18 Signature/Date | | | | | | | | |
| 19 Response | | | <input type="checkbox"/> Accept <input type="checkbox"/> Amended Response | | QAE/Lead Auditor/Date | | Branch Manager/Date | |
| 20 Amended Response | | | <input type="checkbox"/> Accept <input type="checkbox"/> Reject | | QAE/Lead Auditor/Date | | Branch Manager/Date | |
| 21 Verifi-cation | | | <input type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory | | QAE/Lead Auditor/Date | | Branch Manager/Date | |
| 22 Remarks | | | | | | | | |
| 23 QA CLOSURE | | | QAE/Lead Auditor/Date | | Branch Manager/Date | | PQM/Date | |



**WMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET**

N-QA-038
10/86

SDR No.

078

Rev.

1

Page

2

of 2

Block 8 Requirement (cont'd)

in a minimum of five quality assurance audits within a period of time not to exceed three years prior to the date of qualification, one audit of which shall be a nuclear quality assurance audit and shall be made within the year prior to his qualification. Objective evidence of audit experience during previous employment will be considered for qualification as well as certification meeting the requirements of this procedure." (Refer to audit checklist item no. 18-07)

Discussion: The response to Rev. 0 did not provide objective evidence of the performance of five audits within the past three years, one of which was to be a nuclear quality assurance audit performed within the year prior to Mr. Lyken's qualification. Therefore, the response was rejected and the SDR is reissued as Rev. 1.

WMPO STANDARD DEFICIENCY REPORT

N-QA-038
3/87

| | | | | | |
|---|--|---|---|--|---|
| Completed by Originating QA Organization | 1 Date 8/28/87 | | 2 Severity Level <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 | | Page 1 of 2 |
| | 3 Discovered During WMPO Audit 87-10 | | 3a Identified By D. Klimas | | 3b Branch Chief Concurrence Date N/A |
| | 4 SDR No. 078 | | Rev. 0 | | |
| | 5 Organization REECO | | 6 Person(s) Contacted M. Fox | | 7 Response Due Date is 20 Working Days from Date of Transmittal |
| Completed by Organization in Block 5 | 8 Requirement (Audit Checklist Reference, if Applicable) REECO NNWSI Quality Operations Procedure NQP 18.1, "Qualification and Certification of Quality Assurance Audit Personnel", Rev. 0, Para. 2A states "Audit Participation - the prospective lead auditor shall have participated (cont'd) | | | | |
| | 9 Deficiency Contrary to the above requirement, there was no objective evidence of the performance of five audits in three years for lead auditor Bob Lykens. Note: Currently he is the only certified lead auditor within REECO. | | | | |
| | 10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective 1) Acquire objective evidence of required audit participation. 2) Reinstruct appropriate personnel to procedural requirements. Provide objective evidence with response to the SDR. | | | | |
| | 11 QAE/Lead Auditor Date <i>Bernard Heaney 9/9/87</i> | | | | |
| Comp. by Orig. QA Org. | 12 Branch Manager <i>W.R. Kazen 9/9/87</i> | | Date | | 13 Project Quality Mgr. Date <i>James Blayford 9/11/87</i> |
| | 14 Remedial/Investigative Action(s) See attachment | | | | |
| | 15 Effective Date _____ | | | | |
| | 16 Cause of the Condition & Corrective Action to Prevent Recurrence N/A | | | | |
| 17 Effective Date _____ | | | | | |
| 18 Signature/Date <i>M. Fox 10/14/87</i> | | | | | |
| 19 Response | | <input type="checkbox"/> Accept <input type="checkbox"/> Amended Response | QAE/Lead Auditor/Date <i>B. Heaney 11/4/87</i> | | Branch Manager/Date <i>W.R. Kazen 11/4/87</i> |
| | | <input checked="" type="checkbox"/> Reject | | | |
| 20 Amended Response | | <input type="checkbox"/> Accept <input type="checkbox"/> Reject | QAE/Lead Auditor/Date | | Branch Manager/Date |
| 21 Verification | | <input type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory | QAE/Lead Auditor/Date | | Branch Manager/Date |
| 22 Remarks <i>response rejected refer to SDR-078 Rev. 1</i> | | | | | |
| 23 QA CLOSURE | | QAE/Lead Auditor/Date <i>B. Heaney 11/4/87</i> | Branch Manager/Date <i>W.R. Kazen 11/4/87</i> | PQM/Date <i>J. Blayford 11/4/87</i> | |



WMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

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10/86

SDR No 078

Rev 0

Page 2

of 2

Block 8 Requirement (cont'd)

in a minimum of five quality assurance audits within a period of time not to exceed three years prior to the date of qualification, one audit of which shall be a nuclear quality assurance audit and shall be made within the year prior to his qualification. Objective evidence of audit experience during previous employment will be considered for qualification as well as certification meeting the requirements of this procedure." (Refer to audit checklist item no. 18-07)

SDR 078 - Attachment

SDR 078 - We consider this finding invalid with the following rationale:

Stone and Webster Engineering Co., the company who certified Mr. R. Lykens, was contacted and asked to provide documentation concerning audits conducted or participated in by Mr. Lykens. Stone and Webster responded stating that they do not have such documentation. Copies of any such audits have been turned over to client utility companies.

It is our position that the certification issued to Mr. Lykens is adequate objective evidence for certification because it attests to the fact that he met the requirements of Lead Auditor for nuclear power plants by Stone Webster and client users.



Department of Energy

Post Office Box 98518
Las Vegas, NV 89193-8518

DEC 1 1987

Donald T. Oakley
Technical Project Officer for NNWSI
Los Alamos National Laboratory
N-5, Mail Stop J-521
P.O. Box 1663
Los Alamos, NM 87545

WASTE MANAGEMENT PROJECT OFFICE (WMPO) EVALUATION OF LOS ALAMOS NATIONAL LABORATORY (LOS ALAMOS) AMENDED RESPONSES TO THE QUALITY ASSURANCE (QA) STANDARD DEFICIENCY REPORTS (SDRS) RESULTING FROM AUDIT 87-1 OF LOS ALAMOS (WMPO ACTION ITEM #88-504)

Reference: Letter, Oakley to Blaylock, dtd. 10/5/87

The WMPO has evaluated the Los Alamos amended responses to SDRs 001, 002, 003, and 004, which were generated as a result of WMPO QA Audit 87-1 of the Los Alamos Nevada Nuclear Waste Storage Investigations (NNWSI) Project QA Program. A summary of the evaluations for each amended SDR response is listed below. Additionally, the current status of SDRs 005 through 011, which were also generated during the course of WMPO QA Audit 87-1, is provided. SDRs 003, 005, and 010 require additional information for clarification of corrective actions. You are asked to provide this information to my office within 10 working days of the transmittal date of this letter. You are requested to concurrently send a copy of your reply to Nita J. Brogan of Science Applications International Corporation, Las Vegas, Nevada.

SDR-001, Rev. 0

The amended response submitted is acceptable. The Detailed Procedures (DPs) will be revised where necessary to reflect documentation requirements to demonstrate proper handling, storage, and shipping and, specific requirements (i.e. methods) by which these activities are accomplished.

The SDR will be closed upon satisfactory verification of committed corrective actions which are due to be completed by November 30, 1987.

SDR-002, Rev. 0

The amended response submitted is acceptable and committed corrective actions have been verified to be satisfactorily completed. The SDR is considered closed. A copy of the closed SDR is enclosed for your records. (Refer to WMPO Surveillance Report No. WMPO-SR-88-003 for verification details.)



DEC 1 1987

SDR-003, Rev, 0

The amended response submitted is acceptable. However, upon review of the training syllabus referenced in the amended response, publication preparation and processing was not included. It is understood that the syllabus is presently undergoing revision to include this activity and that Los Alamos personnel will be trained with this document upon approval of the Los Alamos QAPP, Rev. 2. It is requested that Los Alamos provide corrective action completion dates for: (1) the revision of the syllabus to be completed; (2) the completion of training personnel to the syllabus contents; and (3) the completion of placing the memo referenced in the amended response into the publication files.

SDR-004, Rev. 0

The amended response submitted is acceptable and committed corrective actions have been verified to be satisfactorily completed. Los Alamos calibration records now reflect the serial number of weight sets used to calibrate instruments. The calibration of the weight sets can be traced to a Primary Standards Laboratory (PSL) file number. The SDR is considered closed. A copy of the closed SDR is enclosed for your records. (Refer to WMPO Surveillance Report No. WMPO-SR-88-003 for verification details).

The WMPO recognizes that the PSL file number cannot be verified by NNWSI Project personnel for traceability to the National Bureau of Standards as reflected in WMPO letter JB-2752 dated September 17, 1987. However, this is a Project-wide concern which Los Alamos alone cannot satisfy. The concern continues to be pursued for an acceptable solution at the Project Office level.

SDR-005, Rev. 0

Upon verification of committed corrective actions, not all actions were complete. Los Alamos is requested to provide an anticipated corrective action completion date which addresses when procedure TWS-ESS-DP-28 will be reissued and procedure TWS-INC-DP-35 will be revised. The SDR will be closed upon verification of completion of these actions.

SDR-006, Rev. 0

The revised corrective action completion dates are accepted. The revision of Procedure TWS-MSTQA-QP-06 "NNWSI Procurement Procedures," and the existence of a list of QA personnel authorized to perform purchase order reviews will be verified after November 30, 1987, and the training of personnel will be verified after January 15, 1988.

DEC 1 1987

SDR-007, Rev. 0

The revised corrective action completion dates are accepted. The revision of TWS-MSTQA-QP-06 "NNWSI Procurement Procedures" will be verified after November 30, 1987, and the training of personnel will be verified after January 15, 1988.

SDR-008, Rev. 0

The revised corrective action completion dates are accepted. The revision of TWS-MSTQA-QP-06 "NNWSI Procurement Procedures" and the existence of an approved vendor list which is updated quarterly, will be verified after November 30, 1987, and the training of personnel will be verified after January 15, 1988.

SDR-009, Rev. 0

Previously closed. A copy of the closed SDR is enclosed for your records.

SDR-010, Rev. 0

The committed corrective actions for items 1 through 5 of the SDR were completed. However, the Quality Assurance Support Manager does not initial the Nonconformance Report (NCR) log on a monthly basis as required by TWS-MSTQA-QP-16 "NNWSI Control of Nonconformance" to ensure that closure activities are underway for all NCRs. This action is included in a monthly status report of all open items. An amended response is requested to be submitted, which commits to deleting the requirement in QP-16 for the monthly initialing of the NCR log by the QASM since each NCR is reviewed and a status is given each month in the monthly report.

SDR-011, Rev. 0

The revised corrective action completion dates are accepted. The revision of Procedure TWS-MSTQA-QP-17 "NNWSI QA Audits" will be verified upon approval of the revised Los Alamos QAPP, Rev. 2.

If you have any questions, please contact me at FTS 575-8913.



James Blaylock
Project Quality Manager
Waste Management Project Office

WMPO:JB-534

Enclosures:

1. SDR-002, Revision 0
2. SDR-009, Revision 0
3. SDR-004, Revision 0

WMPO STANDARD DEFICIENCY REPORT

N-QA-038
3/87

Completed by Originating QA Organization

| | | | |
|--|--|---|---|
| 1 Date April 3, 1987 | 2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 | | Page 1 of 2 |
| 3 Discovered During WMPO Audit 87-1. | 3a Identified By G. Heaney | 3b Branch Chief Concurrence Date N/A | 4 SDR No. 002 Rev. 0 |
| 5 Organization Los Alamos | | 6 Person(s) Contacted Dave Vaniman/Bruce Crowe | 7 Response Due Date is 20 Working Days from Date of Transmittal |
| 8 Requirement (Audit Checklist Reference, if Applicable) LANL technical procedure TWS-MSTQA-QP-03, "Document Control Procedure" Rev. 2 paragraph 11.3 states "Notebooks shall be peer reviewed, signed, and dated at least every three months by a staff (CONTINUED ON NEXT PAGE) | | | |
| 9 Deficiency Contrary to the above requirements, some Laboratory Notebooks are not receiving the required 3 month peer review. (CONTINUED ON NEXT PAGE) | | | |
| 10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective 1) Correct deficiencies noted in block 9 as well as others that may exist. 2) Revise procedures to differentiate between Laboratory notebooks being used (CONTINUED ON NEXT PAGE) | | | |

Aprvl.

| | | |
|--|--|---|
| 11 QAE/Lead Auditor Date <i>G. W. Estella 4/13/87</i> | 12 Franch Manager Date <i>W. K. Keane 4/13/87</i> | 13 Project Quality Mgr. Date <i>James Blaylock 4/14/87</i> |
|--|--|---|

Completed by Organization in Block 5

| | |
|---|-------------------------|
| 14 Remedial/Investigative Action(s) See attached | 15 Effective Date _____ |
| 16 Cause of the Condition & Corrective Action to Prevent Recurrence See attached | 17 Effective Date _____ |

Comp. by Orig. QA Org.

| | | | |
|---|---|---|--|
| 18 Signature/Date <i>Paul Guthals, QAIM 5/26/87</i> | | | |
| 19 Response | <input type="checkbox"/> Accept <input checked="" type="checkbox"/> Amended Response <input type="checkbox"/> Reject | QAE/Lead Auditor/Date <i>G. W. Estella 7/10/87</i> | Branch Manager/Date <i>W. K. Keane 7/10/87</i> |
| 20 Amended Response | <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject | QAE/Lead Auditor/Date <i>G. Heaney 10/21/87</i> | Branch Manager/Date <i>W. K. Keane 10/21/87</i> |
| 21 Veri- fication | <input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory | QAE/Lead Auditor/Date <i>G. Heaney 10/28/87</i> | Branch Manager/Date <i>W. K. Keane 10/28/87</i> |
| 22 Remarks Refer to surveillance report No. 5R-86-003 for verification activity | | | |
| 23 QA CLOSURE | QAE/Lead Auditor/Date <i>G. Heaney 10/28/87</i> | Branch Manager/Date <i>W. K. Keane 11/2/87</i> | PQM/Date <i>J. Blaylock 11/4/87</i> |



**WMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET**

N-QA-038
10/86

SDR No. 002

Rev. 0

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BLOCK 8 REQUIREMENTS (continued)

member who is capable of performing the task but who has not been assigned to the task." (Refer to Audit Checklist Item No. T-25).

BLOCK 9 DEFICIENCY (continued)

Laboratory Notebook TWS-ESS-1-1/86-9 (510706): did not receive the required 3 month peer review. This notebook is a research notebook.

OBSERVATION: The below listed Laboratory Notebooks are being used as log books. However, procedures do not differentiate between Laboratory Notebooks being used for research or as a log book.

ESS-1-5/86-18
ESS-1-1/86-23
ESS-1-1/86-21
ESS-1-1/86-22
ESS-1-1/86-19
TWS-INC-11-9/82-54
TWS-INC-11-9/82-49

BLOCK 10 RECOMMENDED ACTIONS(S) (continued)

- 2) (continued)
for research or as a logbook. Indicate appropriate reviews and controls for each.
- 3) Reinstruct appropriate personnel to procedural requirements.

SDR-002

BLOCK 14 Remedial/Investigative Action(s)

A finding was given to the Geology/Geochemistry Group (ESS-1) for this same notebook deficiency as a result of the Internal Audit (No. 87-04), February 18-19, 1987. ESS-1 reviewed the notebooks in question. The notebook, TWS-ESS-1-1/86-9, had technical reviews on July 16, 1986, December 29, 1986, and March 26, 1987, and is now on a 3-month schedule. The apparent lapse occurred because of a shift in the original notebook review cycle from a 6-month to a 3-month cycle.

BLOCK 16 Cause of the Condition and Corrective Action to Prevent Recurrence

The root cause for the problem of notebooks versus logbooks stems from a lack of definition. A change request (CR) for TWS-MSTQA-QP-03 regarding the definition of notebook versus logbook will be issued. Logbooks for experimental support documentation entries will be separate from notebooks and will not be required to have a technical review. The CR will be issued by June 2, 1987.

**STANDARD DEFICIENCY REPORT (SDR)-002
REVISION 0
AMENDED RESPONSE**

BLOCK 14 Remedial/Investigative Action(s)

A finding was given to the Geology/Geochemistry Group (ESS-1) for this same notebook deficiency as a result of the Internal Audit (No. 87-04), February 18-19, 1987. ESS-1 reviewed the notebooks in question. The notebook, TWS-ESS-1-1/86-9, had technical reviews on July 16, 1986, December 29, 1986, and March 26, 1987, and is now on a 3-month schedule. The apparent lapse occurred because of a shift in the original notebook review cycle from a 6-month to a 3-month cycle.

LANL-QAS Conducted Survey No. 0019 conducted on September 29, 1987, and October 1, 1987, to ascertain the status of all ESS-1 notebooks and their compliance with the LANL implementing procedures.

**STANDARD DEFICIENCY REPORT
REVISION 1
REVISED CORRECTIVE ACTION DATES**

| <u>SDR No.</u> | <u>Description</u> |
|----------------|---|
| 001 | A project memo discussing handling, storage and shipping will be issued by November 30, 1987 (June 30, 1987, in RQ). |
| 002 | Action items were completed on July 21, 1987. |
| 003 | Change Requests (CR) nos. 015 (RQ-03) was approved 7/20/87 and issued. CR No. 017 is awaiting approval and will be issued October 30, 1987. |
| 004 | QP-15 was revised and will be issued by October 30, 1987. |
| 005 | All actions are completed. |
| 006 | QP-06 will be completed by November 30, 1987. Personnel will be trained by Jan. 15, 1988, in the new procedure. |
| 007 | (Refer to 006 above.) |
| 008 | (Refer to 006 above.) |
| 009 | No action required by the SDR. |
| 010 | All actions have been completed. |
| 011 | QP-17 will be revised upon approval of the revised LANL QAPP, Rev. 2 (NNWSI - 196-17, Rev. 5). |

WMPO STANDARD DEFICIENCY REPORT

N-QA-038
3/87

Completed by Originating QA Organization

| | | |
|--|---|---|
| 1 Date April 3, 1987 | 2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 | Page 1 of 2 |
| 3 Discovered During WMPO Audit 87-1 | 3a Identified By W. R. Kazor | 3b Branch Chief Concurrency Date N/A |
| 4 SDR No. 004 | | Rev. 0 |
| 5 Organization LANL | 6 Person(s) Contacted P. Guthals, G. Casedy, P. Tillery | 7 Response Due Date is 20 Working Days from Date of Transmittal |
| 8 Requirement (Audit Checklist Reference, if Applicable) NNWSI-SOP-02-01 "QAPP Requirements For Participating Organizations and NTS Support Contractors" Rev. 1 Para. 12.1.3 states that "Measuring and test equipment shall be calibrated against certified equipment having known valid relationships to the (CONTINUED ON NEXT PAGE)" | | |
| 9 Deficiency Contrary to the above, procedure LAVML 10.01 Rev. 0 nor the Attendant Calibration form called out the need to identify the SN of the weight set used for the calibration of balance PN 625021 and PN 624829 | | |
| 10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective | | |
| 1) Revise procedure LAVML-10-01 Rev. 0 to include requirements for listing the SN of the weights used to calibrate balances. | | |
| 2) Reinject appropriate personnel to procedural requirements. | | |

| | | |
|---|---|---|
| 11 QAE/Lead Auditor Date <i>J.W. Estella 4/13/87</i> | 12 Branch Manager Date <i>W.R. Kazor 4-13-87</i> | 13 Project Quality Mgr. Date <i>James Blaylock 4/14/87</i> |
|---|---|---|

| | |
|---|-------------------------|
| 14 Remedial/Investigative Action(s) See attached | 15 Effective Date _____ |
|---|-------------------------|

| | |
|---|-------------------------|
| 16 Cause of the Condition & Corrective Action to Prevent Recurrence See attached | 17 Effective Date _____ |
|---|-------------------------|

18 Signature/Date
Paul Guthals, QAIM 5/26/87

| | | | |
|---------------------|--|--|---|
| 19 Response | <input type="checkbox"/> Accept <input checked="" type="checkbox"/> Amended Response | QAE/Lead Auditor/Date <i>J.W. Estella 7/10/87</i> | Branch Manager/Date <i>W.R. Kazor 7/10/87</i> |
| 20 Amended Response | <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject | QAE/Lead Auditor/Date <i>G. Heaney 10/20/87</i> | Branch Manager/Date <i>W.R. Kazor 10/20/87</i> |
| 21 Verification | <input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory | QAE/Lead Auditor/Date <i>G. Heaney 10/28/87</i> | Branch Manager/Date <i>W.R. Kazor 11/2/87</i> |

22 Remarks *Refer to surveillance report No. SR-88-003 for verification activities.*

| | | | |
|---------------|--|--|---------------------------------------|
| 23 QA CLOSURE | QAE/Lead Auditor/Date <i>G. Heaney 10/28/87</i> | Branch Manager/Date <i>W.R. Kazor 11/2/87</i> | PQM/Date <i>J Blaylock 11/4/87</i> |
|---------------|--|--|---------------------------------------|



**WMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET**

N-QA-038
10/86

SDR No. 004

Rev. 0

Page 2 of 2

BLOCK 8 REQUIREMENT (continued)

National Bureau of Standards or other nationally recognized standards and shall be calibrated, adjusted, and maintained at prescribed intervals. If no nationally recognized standards exist, the basis for calibration shall be documented. (Refer to Audit Checklist Item No. 12.0.3).

BLOCK 10 RECOMMENDED ACTION(S) (continued)

- 3) Perform necessary reviews and actions to ensure that the weights used on the balances noted in Block 9 can be traceable to N.B.S.
- 4) Investigate to ensure that the cited deficiency does not exist for other calibrated instruments.

SDR-004

BLOCK 14 Remedial/Investigative Action(s)

1. We determined from further discussion with Glenn Casedy that he has used only one weight set, Metrology Calibration (MEC-8) file 3432, to calibrate all balances. This weight set is NBS traceable as shown in the enclosed documentation from MEC-8.

The internal LANL Calibration Procedure, LAVML-10-01, Rev. 0, will not be addressed directly. CR-014 to TWS-MSTQA-QP-15 instructs NNWSI personnel to request the necessary information from calibration personnel by using a form that has been prepared (see enclosure).

2. The CR-014 will be distributed along with a memo to instruct the appropriate people about their responsibility to request the necessary information to assure NBS traceability.
3. As noted in 1 above, the balance property number (PN) 625021 has been traced through MEC-8 file 3432. It is NBS traceable as shown in the MEC-8 file (see enclosure). PN 624829 has been traced through the MEC-8 file 3021, and it is also NBS traceable (see enclosure).
4. A surveillance will be conducted to determine if similar deficiencies occurred in the program. The surveillance will be completed by July 15, 1987.

BLOCK 16 Cause of the Condition and Corrective Action to Prevent Recurrence

1. The LANL Calibration and Standards Laboratory has internal procedures that serve the needs of the Laboratory. NNWSI has different and more stringent requirements. Since the NNWSI calibration requirements are only a small portion of MEC-8's responsibilities, it will be notified of the NNWSI specific requirements by use of a specialized request form. This corrective action on our part will negate the need of MEC-8 to incorporate our NNWSI requirements into their procedures.
3. The M&TE calibration forms will include NBS traceable information for each instrument calibrated to these standards.

2 & 4. Refer to responses in Block 14, 2 and 4, above.

QP-15 will be revised in its entirety by July 31, 1987.

**STANDARD DEFICIENCY REPORT (SDR)-004
REVISION 0
AMENDED RESPONSE**

BLOCK 14 Remedial/Investigative Action(s)

1. **INC - 7/11 Balance PN 625021 is calibrated by Glen Casedy from a service organization with LANL, MEC-9. He has one weight set that he uses to calibrate all balances. This weight set has no serial number and is identified by the MEC-8 file number, 3432, which is affixed to the set. In the past, this file number was recorded neither by him, nor by LANL NNWSI QA. Since this omission was discovered, he has generated a new form, which includes this identifier. Also, LANL NNWSI QA has generated a form, CR-014, included with QP-15, RO for all calibrated M&TE. The form includes the request for those or other unique identifiers for the calibrated equipment.**

The internal LANL Calibration Procedure, LAVML-10-01, Rev. 0, will not be addressed directly. CR-014 to TWS-MSTQA-QP-15 instructs NNWSI personnel to request the necessary information from calibration personnel by using a form that has been prepared (see enclosure).

2. **The CR-014 will be distributed along with a memo to instruct the appropriate people about their responsibility to request the necessary information to assure NBS traceability.**
3. **ESS-1 Balance PN 624829 is operator (in group) calibrated with a weight set that has no serial number and is identified by MEC-8 file number, 3021, which is affixed to the set. This information is now included on the NNWSI form, CR-014, from QP-15, RO. Again this is the only weight set used, thus confirming the certainty of the connection between the balance and weight set.**
4. **A surveillance will be conducted to determine if similar deficiencies occurred in the program. The surveillance will be completed by July 15, 1987.**

**STANDARD DEFICIENCY REPORT
REVISION 1
REVISED CORRECTIVE ACTION DATES**

| <u>SDR No.</u> | <u>Description</u> |
|----------------|---|
| 001 | A project memo discussing handling, storage and shipping will be issued by November 30, 1987 (June 30, 1987, in RQ). |
| 002 | Action items were completed on July 21, 1987. |
| 003 | Change Requests (CR) nos. 015 (RQ-03) was approved 7/20/87 and issued. CR No. 017 is awaiting approval and will be issued October 30, 1987. |
| 004 | QP-15 was revised and will be issued by October 30, 1987. |
| 005 | All actions are completed. |
| 006 | QP-06 will be completed by November 30, 1987. Personnel will be trained by Jan. 15, 1988, in the new procedure. |
| 007 | (Refer to 006 above.) |
| 008 | (Refer to 006 above.) |
| 009 | No action required by the SDR. |
| 010 | All actions have been completed. |
| 011 | QP-17 will be revised upon approval of the revised LANL QAPP, Rev. 2 (NNWSI - 196-17, Rev. 5). |

WMPO STANDARD DEFICIENCY REPORT

N-QA-038
3/87

Completed by Originating QA Organization

| | | |
|---|---|---|
| 1 Date April 3, 1987 | 2 Severity Level <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 | Page 1 of 1 |
| 3 Discovered During WMPO Audit 87-1 | 3a Identified By Carl Newton | 3b Branch Chief Concurrency Date N/A |
| 4 SDR No. 009 | | Rev. 0 |
| 5 Organization LANL | 6 Person(s) Contacted Elroy Bustos (MAT-11) | 7 Response Due Date is 20 Working Days from Date of Transmittal |
| 8 Requirement (Audit Checklist Reference, if Applicable) LANL Procedure TWS-MSTQA-QP-06, "NNWSI Procurement Procedures" Rev. 2 Para. 4.4.6 requires MAT to send final purchase orders to WMPO when issued. (See Checklist Item Numbers 4.0-16, 4.0-17, and 4.0-18.) | | |
| 9 Deficiency Copies of final purchase orders for Level 1 activities are not sent to WMPO by MAT as specified by the LANL Procedure. In fact, these documents are forwarded to WMPO by the QA organization. | | |
| 10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input type="checkbox"/> Investigative <input type="checkbox"/> Corrective Review Procedure and revise if necessary. | | |

Completed by Organization in Block 5

| | | |
|--|---|---|
| 11 QAE/Lead Auditor Date <i>J.W. Estella 4/13/87</i> | 12 Branch Manager Date <i>U.R. Karon 4-13-87</i> | 13 Project Quality Mgr. Date <i>James Blaylock 4/14/87</i> |
| 14 Remedial/Investigative Action(s) See attached | | 15 Effective Date <u>5-11-87</u> |
| 16 Cause of the Condition & Corrective Action to Prevent Recurrence N/A | | |
| 17 Effective Date <u>N/A</u> | | |
| 18 Signature/Date <i>Paul Guthrie QAIM 5/26/87</i> | | |

Comp. by Orig. QA Org.

| | | | | |
|---|---|---|---|--|
| 19 Response | <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject | <input type="checkbox"/> Amended Response | QAE/Lead Auditor/Date <i>J.W. Estella 7/8/87</i> | Branch Manager/Date <i>M. Thompson for 7/9/87</i> |
| 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 <i>J.W. Estella 7/8/87</i> | Branch Manager/Date <i>M. Thompson for 7/9/87</i> |
| 22 Remarks <i>Verified change request NO. 8 was approved 3-23-87 and effective date is 5-11-87. S. Heaney 7-7-87</i> | | | | |
| 23 | QAE/Lead Auditor/Date | Branch Manager/Date | PQM/Date | |

SDR-009

BLOCK 14 Remedial/Investigative Action(s)

CR-008 for TWS-MSTQA-QP-06, paragraph 4.4.6, changes "MAT Division" to "the QAIM." This CR was initiated March 12, 1987, to reflect the working process. It was signed by the TPO March 23, 1987. No further action is required.

BLOCK 16

N/A

WM Record File

1217

WM Project 11

Docket No.

PDR

XLPDR

(S)

Distribution:

Kennedy, J.L. RDM

Youngblood, Stabile

(WM, 623-SS) Riddle, Dannelly

Delligatti

Belke

fcs

WM DOCKET CONTROL CENTER

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