



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

WBS 1.2.9.3  
 QA

JAN 15 1992

Carl P. Gertz, Project Manager, YMP, NV

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-008  
 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT  
 YMP-91-I-01 OF YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT OFFICE

The YMQAD staff has evaluated the response to CAR YM-92-008. The response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this date must be requested in writing with appropriate justification prior to the date. Please send a copy of extension requests to Nita J. Brogan, Science Applications International Corporation, Las Vegas, Nevada.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Neil D. Cox at 794-7236.

*R. E. Spence*

Richard E. Spence, Director  
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-1621

Enclosure:  
 CAR YM-92-008

cc w/encl:

- K. R. Hooks, NRC, Washington, DC
- S. W. Zimmerman, NWPO, Carson City, NV
- J. W. Estella, SAIC, Las Vegas, NV, 517/T-22
- B. J. Verna, MACTEC, Las Vegas, NV

cc w/o encl:

- J. W. Gilray, NRC, Las Vegas, NV
- N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08

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*ADD: Ken Hooks*      *Car. Encl.*  
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OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.

HCAR NO.: YM-93-008  
DATE: 11/6/91  
SHEET: 1 OF 1  
QA  
WBS No.: 1.2.9.3

**CORRECTIVE ACTION REQUEST**

1 Controlling Document  
AP-5.32Q, Revision 1, ICN 1

2 Related Report No.  
Audit YMP-91-I-01

3 Responsible Organization  
YMPO

4 Discussed With  
J. R. Dyer

10 Response Due  
20 days from issuance

11 Responsibility for Corrective Action  
C. P. Gertz

12 Stop Work Order Y or N  
No

5 Requirement:  
AP-5.32Q, Revision 1, ICN 1, Section 5, Steps 10, 11, and 18a, requires that the DDs/TPOs provide documentation of prerequisites to the Project Engineer (PE), that the PE incorporate documentation of prerequisites into the test planning package, and that the PE compile the test planning package ... e. with documentation of completion of prerequisites.

6 Adverse Condition:  
Test Planning Packages (TPPs) do not address prerequisites.  
Discussion:  
Neither TPP 91-32 nor TPP 91-34 specifically addresses prerequisites, and it is impossible to tell from the evidence whether prerequisites were incorporated or if any were received from the DDs/TPCs.

7 Recommended Action(s):  
Correct the discrepancies identified; investigate to determine if similar discrepancies exist. Take action to resolve recurrence such as changing AP-5.32Q to require that prerequisites be identified specifically or a statement be made saying there were no prerequisites.

8 Initiator *NEP, ATL* Date: *10/29/91*  
Neil D. Cox 10/29/91

9 Severity Level -  
1  2  3

13 Approved By: *James Blaylock for RES* Date: *11/14/91*  
OQA

15 Verification of Corrective Action:

16 Corrective Action Completed and Accepted:  
QAR \_\_\_\_\_ Date \_\_\_\_\_

17 Closure Approved By:  
COA \_\_\_\_\_

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

CAR NO. YM-92-008  
DATE: 2 Dec 91  
SHEET: 1 OF 1

**CORRECTIVE ACTION REQUEST**  
(continuation sheet)

This CAR recommends 3 actions: 1. Correct discrepancies identified, 2. Investigate to determine if similar discrepancies exist, and 3. Take action to resolve recurrence such as changing AP 5.32Q.

The responses to these 3 recommendations are:

1. The lack of prerequisites in TPP 91-32 and TPP 91-34 is due to there being no TPP prerequisites. This has been confirmed by Forrest Peters and Marvin Saines respectively. A review of the documentation indicates that the procedure was followed, and since there were no prerequisites, there were no discrepancies.
2. Investigation of other TPP's, existing or in process - 90-1, 91-2, 92-01, and the yet to be numbered TPP for UZ-16, indicates that "prerequisite requirements" for the TPP's do not exist or are being considered. Prerequisites for the Job Packages themselves are handled under AP 5.21Q.
3. To better insure that all required activities are identified and accounted for, AP 5.32Q has been revised (Rev 2, ICN 1), approved by QA, and released.

Response Approved:

*Ann O. Plasen For E. Russ Dyer*  
Acting Division Director, RSED

*12/4/91*  
Date

Response Accepted: \*  
QAR \_\_\_\_\_ Date \_\_\_\_\_

Response Accepted: \*  
OQA \_\_\_\_\_ Date \_\_\_\_\_

\* = SEE AMENDED RESPONSE. =

*Ltr dtd 12/11/91 - RSED:G DR-1211*  
*Response sent carried on 12/4/91*

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CAR NO. YM-92-008  
DATE: 3 JAN 92  
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**CORRECTIVE ACTION REQUEST**  
(Continuation sheet)

Amended Response

Item 1 of request for amended response:

Revision 3 of QAAP16.1 was used to process this CAR which accounts for the format of the original response meeting the requirements of Rev. 3 rather than Rev. 4. Unless otherwise directed, Rev. 3 will continue to guide the resolution to this CAR, and the details are provided below.

Item 2 of request for amended response:

The following summarizes the situation and the solution.

- A. AP-5.32Q, Rev. 1, ICN 1, Sec. 5, step 10: states for the DD/TPO to provide documentation of prerequisites.
- B. For these test planning packages, there are no prerequisites. Therefore, no documentation was created.
- C. Step 11: This non-existent documentation cannot be "incorporated".
- D. Step 16e: Since there are no prerequisites, there will be no documentation of their completion.
- E. The solution to this possible problem was to demonstrate to QA during the audit that prerequisites were not missed. The DDs of RSED, E&DD, POCD, and QA agreed to document that there are no prerequisites for TPP 91-32 & 34. Each DD signed a memo to the TPP files for each of these TPPs. The memos are dated 10-30-91. This information is confirmed by the TPP PES in the CAR response.

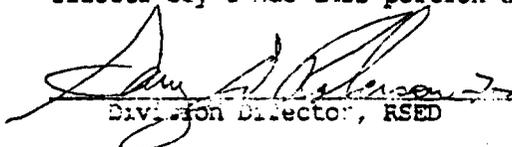
Item 3 of the request for amended response:

It is recognized that as of 10-30-91, Rev. 2 of AP-5.32Q was issued and effective. This was done to satisfy the auditors that future questions as to whether or not prerequisites are identified and documented will not occur.

The original wording about prerequisites caused a duplication of effort since prerequisites are adequately covered by Job Packages, Project/Task Management, and Readiness Reviews.

Therefore, processing of prerequisites has been eliminated from AP-5.32Q which closes this concern.

It is also recognized that the current QA review mentioned in the 19 Dec 91 letter could possibly result in a new concern, even though this letter effectively finds this portion of the response acceptable.

  
Division Director, RSED

1/31/92  
Date

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CAR NO. YM-92-008  
DATE: 1/10/92  
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QA

**CORRECTIVE ACTION REQUEST (Continuation Page)**

Response Accepted: Neil S. Cox 1/10/92  
QAR Date

Response Accepted: R. E. Moore 1/14/92  
CQA Date