



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

WBS 1.2.9.3
 QA

NOV 25 1991

Richard J. Herbst
 Technical Project Officer
 for Yucca Mountain
 Site Characterization Project
 Los Alamos National Laboratory
 University of California
 N-5, Mail Stop J521
 P.O. Box 1663
 Los Alamos, NM 87545

EVALUATION OF RESPONSE TO CORRECTIVE ACTION REQUEST (CAR) YM-92-001
 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT
 YMP-92-01 OF LOS ALAMOS NATIONAL LABORATORY

The YMQAD staff has evaluated the response to CAR YM-92-001. 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 (702) 794-7945 or FTS 544-7945, or Kenneth T. McFall at (702) 794-7280 or FTS 544-7280.

R. E. Spence

Richard E. Spence, Director
 Yucca Mountain Quality Assurance Division

YMQAD:RBC-865

Enclosure:
 CAR YM-92-001

YMP-6
 9112030457 911125
 PDR WASTE
 WM-11 PDR

ADD: Ken Hooker Ltr. Encl.

102.7
 WM-11
 NHA3

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

14 CAR NO.: YM-92-001
DATE: 10/09/91
SHEET: 1 OF 2
QA
WBS No.: 1.2.5.3

CORRECTIVE ACTION REQUEST

1 Controlling Document LANL-YMP-QP-04.4, Rev. 0, & LANL-YMP-QP-04.5, Rev. 0		2 Related Report No. Audit YMP-92-01	
3 Responsible Organization Los Alamos Nat'l. Lab.		4 Discussed With M. Cleavenger & S. Bolivar	
10 Response Due 20 days from issue	11 Responsibility for Corrective Action F. Herbst	12 Stop Work Order: Y or N No	
5 Requirement: <ol style="list-style-type: none"> 1. LANL-YMP-QP-04.4, Rev. 0, Para. 2.0, states in part, "...However, maintenance/repair services that involve calibration as part of that service will be procured pursuant to LANL-YMP-QP-04.5." 2. LANL-YMP-QP-04.5, Rev. 0, Para. 4.2, Definitions states, "A noncommercial grade service is the performance of activities that include, but are not limited to site characterization, design, fabrication, investigation, inspection, nondestructive examination, calibration, or installation and for which controls for acceptance are set prior to procurement." 3. LANL-YMP-QP-04.5, Rev. 0, Para. 6.2.1 states in part, "...The requester, QAL, or QAS evaluates a supplier for qualification..." 			
6 Adverse Condition: <p>Contrary to the above, Los Alamos has purchased calibration services as commercial grade services and has not qualified the vendor.</p> <p>DISCUSSION</p> <ol style="list-style-type: none"> 1. Purchase Requisition (PR) No. Q8608 concerning the procurement of calibration services from Simco was processed according to LANL-YMP-QP-04.4., Rev. 0 instead of LANL-YMP-QP-04.5, Rev. 0 as required. 2. The Simco calibration services were identified as a commercial-grade service instead of a noncommercial-grade service. 3. Simco has not been qualified as a provider of calibration services. 4. ASME NQA-1-1989 does not define commercial-grade services, (see attached ASME NQA-1 Interpretation QA89-003). 			
7 Recommended Action(s): <ol style="list-style-type: none"> 1. Correct deficiency identified by obtaining calibration from a qualified source. 2. Investigate to determine if similar procurements have been made. 3. Take action to prevent recurrence. 			
8 Initiator K.T. McFall <i>Kenneth McFall</i>	Date: 10/4/91	9 Severity Level: 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/>	13 Approved By: OQA <i>[Signature]</i> Date: 10/15/91
15 Verification of Corrective Action:			
16 Corrective Action Completed and Accepted: OAR _____ Date _____		17 Closure Approved By: OQA _____	

ENCLOSURE

File: QA89-003

Subject: ANSI/ASME NQA-1-1986 Edition, and later Addenda through 1c-1988, S-1; 4S-1, Para. 2; 7S-1, Paras. 3.1 and 10; Commercial Grade Services — Subtier Suppliers

Date Issued: November 21, 1989

Question (1): Does ANSI/ASME NQA-1, 7S-1 require that suppliers of commercial grade calibration services for safety-related measuring and testing equipment be evaluated in accordance with para. 3.1?

Reply (1): ANSI/ASME NQA-1 defines commercial grade items in Supplement S-1 and addresses purchasing commercial grade items in Supplement 7S-1, para. 10 but commercial grade services are not defined.

However, ANSI/ASME NQA-1 does include requirements for the control of purchased services as defined by ANSI/ASME NQA-1, Supplement S-1, including supplier selection, bid evaluation, supplier performance evaluation, acceptance of services, and verification of conformance. See Supplement 7S-1 for specific requirements.

Question (2): Do the requirements of ANSI/ASME NQA-1, 7S-1, para. 3.1 for evaluation of suppliers of services apply through succeeding levels of subtier suppliers?

Reply (2): Yes, procurement documents issued at all tiers of procurement shall include provisions deemed necessary by the purchaser at each tier. See ANSI/ASME NQA-1, 4S-1, para. 2.

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

CAR NO _____
DATE _____
SHEET _____ OF _____

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE FOR CAR NO. YM-92-001:

Page 1 of 2

A. Extent of Deficiency:

The LANL YMP Quality Assurance Project Leader (QAPL) requested that the EES-1 Quality Assurance Liaison (QAL) review EES-1 Purchase Requests (PR) to determine if any additional calibration procurements were processed as commercial-grade.

The EES-1 QAL reviewed all EES-1 PRs and has documented that there are no additional calibration procurements processed as commercial grade.

B. Root Cause:

The requester misinterpreted LANL-YMP-QP-04.4, R0, requirements. QP-04.4, R0, Section 2.0, states in part, "However, maintenance/repair services that involve calibration as part of that service will be procured pursuant to LANL-YMP-QP-04.5." The requester interpreted this to mean that only those calibrations performed as a result of maintenance/repair services needed to be procured pursuant to QP-04.5.

C. Remedial Action:

Implementation of the remedial actions will be the responsibility of the LANL YMP QAPL. Scheduled completion date: December 31, 1991.

Based on another YMP participant's qualification of Simco, Simco will be qualified as a provider of calibration services by the method of "Evidence of Prior Acceptance" per QP-04.5, R1. The LANL YMP QAPL will have the subject record package corrected to include the Simco qualification documentation.

D. Corrective Action to Prevent Recurrence:

Implementation of the corrective action to prevent recurrence will be the responsibility of the LANL YMP QAPL. Scheduled completion date: December 31, 1991.

As a result of this CAR, the requester of the subject PR now understands that any calibration service must be procured pursuant to QP-04.5.

QP-04.4, Section 2.0, will be revised to state, "any services that involve calibration will be procured pursuant to QP-04.5." In the meantime, the QAPL has issued memo

BTW dtd 11/9/91 - TWS - EES - 13-11-91-032

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

CAR NO. _____
DATE _____
SHEET _____ OF _____

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE FOR CAR NO. YM-92-001: (cont.)

Page 2 of 2

TWS-EES-13-10-91-047 instructing LANL YMP personnel that all vendors of calibration services must be qualified before calibrations can be conducted.

Response Approved	<u><i>S. L. Bolivar</i></u> LANL QAPL S.L. Bolivar	<u>11/19/91</u> DATE
Response Approved	<u><i>R. J. Herbst</i></u> LANL TPO R. J. Herbst	<u>11/19/91</u> DATE
Response Approved	<u><i>Kenneth West</i></u> QAR	<u>11/19/91</u> DATE
Response Approved	<u><i>[Signature]</i></u> /YMQAD	<u> </u> DATE

NOV 25 1991

Richard J. Herbst

-2-

cc w/encl:

K. R. Hooks, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
S. L. Bolivar, LANL, Los Alamos, NM
M. J. Clevenger, LANL, Los Alamos, NM
J. L. Day, LATA, Los Alamos, NM

cc w/o encl:

J. B. Tillman, LAAO
J. H. Hines, OQD, AL
A. R. Chernoff, MSD, AL
J. W. Gilray, NRC, Las Vegas, NV
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08