the second strategy



Department of Energy

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

APR 0.5 1988

Dr. Klans Stetzenbach Environmental Research Center University of Nevada, Las Vegas 4505 South Maryland Parkway Las Vegas, NV 89154

INVITATION TO PARTICIPATE IN THE U.S NUCLEAR REGULATORY COMMISSION AND U.S. DEPARTMENT OF ENERGY (DOE) TECHNICAL MEETING ON ALTERNATE CONCEPTUAL MODELS OF THE GROUNDWATER SYSTEM AT THE YUCCA MOUNTAIN SITE

The DOE is planning to conduct a technical meeting on the subject of alternative conceptual models of the groundwater system at Yucca Mountain, Nevada. This workshop is being planned as part of the consultation process. The purpose of the meeting is to consider different conceptual models of the groundwater system, including geologic, tectonic, hydrologic, geochemical, and climatological influences in the Yucca Mountain region. Open discussion of the similarities, differences, and compatibilities of the various conceptual models is anticipated. The relative merits of the models will not be evaluated during the meeting.

Our records indicate that you commented on, or expressed an interest in, the conceptual model of the Yucca Mountain groundwater system as presented in the Environmental Assessment or in the Site Characterization Plan/Consultation Draft (SCP/CD). The DOE is therefore encouraging you to attend the technical meeting and to present or participate in discussions of alternate conceptual models. If you are unable to attend and have a colleague(s) who has expressed an interest, please extend this invitation to that person(s).

Presenters are encouraged to address the following points to facilitate open discussion about aspects of the various conceptual models:

- o Assumptions underlying the model.
- o Physical processes and disruptive events incorporated in the model.
- o Boundary conditions.
- o Available data supporting the model.
- o Additional data needed to refine the model and field and laboratory testing proposed to gather the additional data.
- o Analyses to be performed to evaluate the data and the conceptual model.
- o Implications for groundwater travel time and radionuclide release.

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NRC-DOE TECHNICAL MEETING

ALTERNATIVE CONCEPTUAL MODELS OF THE GROUNDWATER SYSTEM

YUCCA MOUNTAIN, NEVADA

PRELIMINARY AGENDA

Meeting purpose is to consider different conceptual models of the groundwater system, including the geologic, tectonic, hydrologic, geochemical, and climatologic influences in the Yucca Mountain region. This is to promote open discussion about similarities, differences, and compatibilities of the various conceptual models. Using such information, DOE will be able to ensure that the SCP contains plans for data collection sufficient to evaluate alternative models. Each presentation should include the following six items:

- o Assumptions supporting the model
- o Physical processes and disruptive events incorporated in the model
- o Boundary conditions
- o Available data supporting the model
- o Additional data needed to refine the model and testing proposed to gather the additional data (surface-based/ESF)
- o Analyses to be performed to evaluate the data and the conceptual model

Day 1

9:00 - 9:30	DOE Introductory Remarks	
	Purpose and Scope Background	R. Stein, DOE/HQ C. Gertz, DOE/NV
9:30 - 11:00	NRC Introductory Remarks and Summary of SCP-CD Comments Relevant to Conceptual Models	
11:00 - 11:30	DOE Response	
11:30 - 1:00	Lunch	
1:00 - 4:00	DOE Conceptual Model	
1:00 - 1:10	Introduction	M. Blanchard, DOE/NV
1:10 - 2:45	The Hydrologic Setting	W. Wilson, USGS
	o Include the 6 items identified above	

2:45 - 3:00	Break	
3:00 - 3:45	Translation to numerical models for performance assessment	S. Sinnock, SNL
	o Include the 6 items identified above	
3:45 - 5:00	Clarifying questions and commentary from participants	
Day 2		
		Chairpersons: S. Brocoum, DOE/HQ M. Blanchard, DOE/NV
1 to 3 hrs	Description of Alternative Conceptual Model	
for each presenter	o Include the 6 items identified above	
15 to 30 min.	Clarifying questions from Particip on description of Conceptual Model	

Day 3

8:00 - 10:30	Open discussion of similarities and	Chairpersons:		
	differences among the various Conceptual	S. Brocoum, DOE/HQ		
	Models	M. Blanchard, DOE/NV		

Moderators: D. Siefken, Weston M. Voegele, SAIC

- o Extent to which the alternative conceptual models incorporate the same physical processes and disruptive events and where they differ
- o Extent to which the alternative conceptual models employ the same underlying assumptions and where they differ
- o Extent to which the alternative conceptual models have similar initial fixed and variable boundary conditions and where they differ
- o Extent to which the alternative conceptual models have similar information needs and where they differ
- o Implication of models on groundwater travel time and radionuclide transport

10:30 - 11:00 Caucus/Break

11:00 - 12:00 View of each presenter as presented by a Spokesperson from each organization

- 12:00 1:00 Lunch
- 1:00 3:00 Open discussion on Sufficiency of Data Chairpersons: Collection Plans in SCP-CD (DOE to S. Brocoum, DOE/HQ provide brief summary/overview of M. Blanchard, DOE/NV related topics from SCP-CD
 - Moderators:
 - D. Siefken, Weston
 - M. Voegele, SAIC

o Extent to which the surface-based testing information needs are similar and where they differ

- o Extent to which the ESF testing information needs are similar and where they differ
- 3:00 3:30 Break
- 3:30 5:00 Discussion on Sufficiency of Data (continued)
- 5:00 5:30 Caucus for Day 4 Summary Statements

Day 4

8:00 - 9:00	DOE Statement: Discussion relevant to	Chairpersons:		
	Szymanski's draft report; Summary State-	S. Brocoum, DOE/HQ		
	ment on Alternative Conceptual Models	M. Blanchard, DOE/NV		

- 9:00 9:30 NRC Summary Statement on Alternative Conceptual Models
- 9:30 10:00 State Summary Statement on Alternative Conceptual Models
- 10:00 12:00 Preparation of Draft Meeting Summary
- 12:00 1:00 Lunch
- 1:00 5:00 Discussion and Finalization of Meeting Summary

Dr. Klans Stetzenbach

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Please note that information concerning the additional data needed to refine the model and the testing proposed to gather the additional data is considered essential to the objective of the meeting. That objective is to outline steps needed to determine if the testing program proposed in the SCP/CD will provide the data needed to test alternative conceptual models of the groundwater system at Yucca Mountain. A verbatim transcript of the meeting will be prepared in order to maintain as complete a record as possible.

The meeting will be held April 11-14, 1988, at the Aladdin Hotel in Las Vegas, Nevada. A preliminary agenda of the meeting is enclosed. Please contact Edward Regnier, DOE Office of Civilian Radioactive Waste Management, (202) 586-4959 or FTS 586-5355, if you have any questions. We also request that you advise Mr. Regnier as to whether you will participate or not.

HAR

Carl P. Gertz, Project Manager Waste Management Project Office

WMPO:RAL-1717

Enclosure: Preliminary Agenda

cc w/encl: V. J. Cassella, HQ (RW-222) FORS Ralph Stein, HQ (RW-24) FORS S. H. Kale, HQ (RW-20) FORS T. H. Isaacs, HQ (RW-20) FORS E. P. Regnier, HQ (RW-242) FORS S. J. Brocoum, HQ (RW-233) FORS D. L. Siefken, Weston, Washington, DC B. J. Youngblood, NRC, Washington, DC M. A. Glora, SAIC, Las Vegas, NV M. B. Blanchard, WMPO, NV



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cc w/encl: S. W. Zimmerman, State of NV, Carson City, NV V. J. Cassella, HQ (RW-222) FORS Ralph Stein, HQ (RW-23) FORS R. W. Clark, DOE/HQ (Weston), Washington, DC M. J. Regenda, F&S, Mercury, NV S. H. Klein, SAIC, Las Vegas, NV W. R. Kazor, SAIC, Las Vegas, NV J. W. Estella, SAIC, Las Vegas, NV 0. D. Smith, SAIC, Las Vegas, NV F. J. Ruth, SAIC, Las Vegas, NV H. H. Caldwell, SAIC, Las Vegas, NV J. P. Donnelley, NRC, Washington, DC M. B. Blanchard, WMPO, NV W. R. Dixon, WMPO, NV L. P. Skousen, WMPO, NV C. P. Gertz, WMPO, NV R. E. Monks, WMPO, NV M. P. Kunich, WMPO, NV



Department of Energy

Post Office Box 98518 Las Vegas, NV 89193-8518

APR 0 5 1988

Richard L. Bullock Technical Project Officer for NNWSI Fenix & Scisson, Inc. P.O. Box 93265 Las Vegas, NV 89193-3265

WASTE MANAGEMENT PROJECT OFFICE (WMPO) QUALITY ASSURANCE (QA) STANDARD DEFICIENCY REPORTS (SDRS) RESULTING FROM AUDIT 88-01 OF FENIX & SCISSON, INC. (F&S) SUPPORT OF THE NEVADA NUCLEAR WASTE STORAGE INVESTIGATIONS (NNWSI) PROJECT (WMPO ACTION ITEM #88-1445)

Enclosed are 13 SDRs, Nos. 104 through 116, which were generated during the course of WMPO QA Audit 88-01 of the F&S NNWSI Project program plan and technical activities. Please note that you are required to provide a response to each SDR by completing Blocks 14 through 18 as appropriate on the first page of each SDR. (Be advised that the audit checklist references provided on each SDR are for WMPO internal use and should have no bearing on your ability to respond to the cited deficiencies.)

A copy of your responses is due back to this office 20 working days from the date of this letter. You are asked to concurrently send the original of each SDR response to Nita Brogan of Science Applications International Corporation, Las Vegas, Nevada.

If you have any questions, please contact Henry H. Caldwell at 295-8740.

James Blaylock

Project Quality Manager

Waste Management Project Office

WMPO:JB-1720

Enclosure: SDR Nos. 104-116



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WMPO STANDARD DEFICIENCY REPORT CONTINUATION SHEET

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Block 9 Deficiency (cont'd)

The WMPO recognizes that this same deficiency was previously reported by F&S on Audit Deficiency Report No. QA(N)-87-01-4. However, this SDR is being written because no actions were taken or committed in the referred ADR to prevent recurrence of this deficiency. As a minimum, personnel involved with the activity should be reinstructed to procedural requirements and a review should be made to assess any adverse impacts on the final work product.

Block 10 Recommended Action(s) (cont'd)

- 2. Reinstruct appropriate personnel to procedural requirements. Provide objective evidence with response to the SDR.
- 3. Perform a review to assess any adverse impacts on the final work product caused by the identified deficiency.
- 4. Annotate the file for Study No. 11 and other files with similar deficiencies to indicate that the deficiency described in Block 9 has been identified in WMPO SDR-104 (Audit 88-01).

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WMPO STANDARD DEFICIENCY REPORT CONTINUATION SHEET

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Block <u>8 Requirements</u> (cont'd)

(Synonymous with the NRC definition of QA administrative procedures) which shall provide the description of the organization's QA program and <u>indicate the commitment</u> to the applicable NNWSI Project QA requirements given herein.

Requirement No. II: NVO-196-17, Rev. 5, Sec. II, Para. 1.2 Contents of the QAPP states in part: The QAPP shall be submitted to the WMPO for review and approval prior to implementation and shall include a checklist based on this NNWSI QAPP which identifies how and where each requirement of this document is addressed. The QAPP of each Project participant and NTS Support Contractor shall be reviewed, comments resolved, and the document approved by the WMPO prior to implementation.

Requirement No. III: F&S QAPP-002, Rev. 2, Sec. II, Para. 2.1.1 states in part: The QA criteria and specific requirements associated with these criteria have been adapted to the NNWSI Project activities through NVO-196-17 and are addressed in QAPP-002. When a specific criteria is not applicable to F&S activities it will be noted in the QAPP and recorded on the checklist.

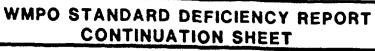
Requirement No. IV: F&S QAPP-002, Rev. 2, Sec. 4.0 "Procurement Document Control" Para. 4.1.1 states in part: <u>Exception</u>. This section is not applicable to F&S as the AE for the design of the ESF. When and if F&S is assigned procurement responsibility, the QA requirements will be in accordance with NVO-196-17.

Requirement No. V: F&S QAPP-002, Rev. 2, Sec. 7.0 "Control of Purchased Items and Services," Para. 7.1 states in part: <u>Exception</u>. This section, same as 4.0 is not applicable to F&S as the AE for design of the ESF. When and if F&S is assigned procurement responsibility, the QA requirements will be in accordance with NV0-196-17.

Block 9 Deficiency (cont'd)

- o Dr. E. J. Cording, Geotechnical Consultant, Contract No. 508-SC-02, initiated 6/20/86 and amended 1/27/88.
- Floyd C. Bossard & Associates, Ventilation Consultant, Contract No. 508-SC-04, initiated 6/20/86 and amended 1/26/88.
- David W. Kneebone, OCCU Safety Specialist, Contract No. 508-SC-05, initiated 7/30/86 and amended 1/26/88.

The subject purchased services were amended prior to submitting to the WMPO for approval and prior to implementation, a revision to the F&S QAPP-002 which would address a commitment to the requirements of NVO-196-17, Rev. 5, Sec. 4.0 "Procurement Document Control" and Sec. 7.0 "Control of Purchased Items and Services."



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Block 10 Recommended Action(s) (cont'd)

Section 4.0 "Procurement Document Control" and Section 7.0 "Control of Purchased Items and Services."

Develop procedures which implement the aforementioned requirements prior to resumption of procurement of items and services.

Evaluate work performed by the referenced subcontractors since 1/12/88 for impact on quality of services performed.

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Block 8 Requirement (cont'd)

2.4.1.1 Position Description minimum education and experience requirements are established and documented on position descriptions for each position involved in the performance of activities that effect quality.

Requirement No. 2-PP-60.01, Rev. O "Personnel Selection and Indoctrination", Para. 6.1, "Position Descriptions" states: Each manager and supervisor shall establish, document and maintain on file, position for their direct subordinates.

Block 9 Deficiency (cont'd)

has established personnel minimum position description requirements for personnel performing activities affecting quality.

This condition resulted in the inability to determine the validity of the qualification of ESF personnel performing activities which effect quality.

Block 10 Recommended Action(s) (cont'd)

Each manager/supervisor must indicate, e.g., sign and date, that they have established these "position descriptions" or establish a management endorsement of the above "position descriptions."

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Block 8 Requirement (cont'd)

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Sub Para. 2.4.1 states in part: Establishment of requirements-F&S has established requirements for the selection, indoctrination, and training of personnel performing or verifying activities that affect quality. The requirements establish position descriptions that set forth minimum personnel qualifications and provide for appropriate indoctrination or training or both, prior to initiation of activities that effect quality.

Requirement No. 2-F&S QAPP-002, Rev. 2, Sec. 2.0 "Quality Assurance Program", Par. 2.4 "Personnel Selection, Indoctrination, and Training Procedures", Sub. Para. 2.4.1.4 states in part: <u>Training</u>. Prior to assigning personnel to perform quality affecting activities that are complex in nature (i.e., assignments where it is deemed necessary to demonstrate initial proficiency), training will be conducted to gain the required proficiency. The training (in-depth instruction) will include the principles, techniques, and requirements of the activity. Such in depth instructions may be internal or external classroom sessions supplemented by hands on workshops, on-the-job training, other instructional methods, or combinations thereof.

Block 10 Recommended Action(s) (cont'd)

Develop training procedures and train (in-depth instruction) as deemed necessary the subject personnel in the unique requirements associated with identified complex activities prior to the performing the subject task.

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	 a Requirement (Audit Checklist Reference, if Applicable) Check List element 1-9 PP-60.01, Rev. 0, Personnel Selection and Indoctrination, para. 6.2 "Personnel Qualification Evaluation" states in part: Each Manager and Supervisor shall compare the education, experience, and training against those (cont'd) b Deficiency Contrary to the above requirement, managers and supervisors have 								
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Block 8 Requirement (cont'd)

specified in the position description and NNWSI Procedures. Only employees who meet the standard will be utilized to perform activities that affect quality. The Managers and Supervisors will certify that requirements have been met in the format specified in Attachment 1.

A copy of this shall be sent to Central Files.

Block 9 Deficiency (cont'd)

would be considered invalid.

Project Design Manager Lead Project Design Engineer Design Support Services Manager Project QA Representative Lead Mining Design Engineer Senior Mining Engineer Structural Engineer Lead Mechanical Design Engineer Lead Electrical/Instrumentation Engineer Quality Assurance Coordinator - LV Office

Block 10 Recommended Action(s) (cont'd)

description.

Perform and document initial proficiency in accordance with pre-established position description.

Evaluate work performed by currently assigned individuals and determine if they were qualified to perform their assigned tasks by comparison to established position descriptions.

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QA Oraa	Fenix &	Scisson) Contacted Dan Tunney		7 Response Due Date is 20 Working Days from Date of Transmittal			
Originating Q	s Requiremer The Lead Aud surveillance Deficiency R	itor or a to verify	designated (/ implementat	team auditor shall p	erform a loction as	stated in the Audit			
à	November 30, 1987 indicating acceptance and closeout prior to completion of corrective action. The corrective action was to revise F&S procedure DC-12 to comply								
Completed	10 Recommen Reinstruct a Deficiency R	udit perso		dial 🛛 Investigative procedure requiremen		ive ling closeout of Audit			
Aprvl.	11 QAE/Lead A	MAR 14	10.0	Ch Manager Date Kazor 3/16/8	F 13 Pr	oject Quality Mgr. Date			
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381-20	WMPO STANDARD DEFICIENCY REPORT CONTINUATION SHEET	N-QA-03 10/86
SDR	No. 109 Rev. 0 Page 2	of 2
	Block 8 Requirement (cont'd)	
	or documentation viewed as evidence of corrective action implementation. Auditor shall then sign the ADR indicating acceptance and closeout.	The Lead
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		WMP	O STAND	ARD DEF	ICIENCY	REPC	ORT	N-QA-038 3/87
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Organization	3 Discovered WMPO Audit	-1	I dentified By D. Klimas	36 Branc Conci N/A	h Chief arrence Da	te	• SDR No. 110	. Rev
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Comple	not having an Corrective Ac 10 Recommen Initiate a CA have approved in OAP 16.1(N	ded Action(s R procedure procedures), Rev, 0	<u>}</u> ⊠ Remed ia e requirement s in place.	. Investi		termino		
Aprvl.	11 QAE/Lead		1.VL	h Manager	Date 11/88	13 Pr	oject Quality	Mgr. Date
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1. An organ it's ass	nization is not fo igned tasks; as i	llowing or does not have approved procedunt of the subject surveillance.	ires to	acc	ompl	ish
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Organization	3 Discovered (WMPO Audit	-	lentified By D. Klimas		Chief rence Date	4	SDR No. 111	Rev.)
A Oroa	5 Organization Fenix & Scis		6 Person(s) (Dan	Contacted Tunney		7		Due Dati ng Days Transmitta	from
Originating QA	Para. 18.10, investigatio prepared by	8 Requirement (Audit Checklist Reference , if Applicable) F&S QAPP-002, Rev. 2, Sec. 18, Para. 18.10, 2nd Para. states in part: "Measures for the surveillance of site investigations will be established and executed in accordance with procedures prepared by F&S.							
Completed by Or		activities s SR-88-001	without an , SR-87-06.	approved su	irveillance	e procec	lure. Re	ning ference F	F&S
Comple	10 Recommend Initiate, ap surveillance activities.	prove and p	ublish a su	rveillance p	rocedure	for the	conduct of	of eillance	
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Organization	3 Discovered [During 30 l	dentified By	3b Branch Chief Concurrence D	4 SDR N			
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1 B	5 Organization		6 Person(s)	Contacted	7 Respo	onse Due Date is orking Days from		
			D. J	. Tunney	Date	of Transmittal		
Originating QA	8 Requirement Personnel Se <u>Descriptions</u> file, posit	a Requirement (Audit Checklist Reference, if Applicable) Requirement No. 1 PP-60-01, Rev. 0 Personnel Selection & Indoctrination: Paragraph states: 6.1 <u>Position</u> <u>Descriptions</u> Each Manager and Supervisor <u>shall establish</u> , document and maintain on file, position descriptions for their direct subordinates. (cont'd)						
Completed by Ori		enior QA E ngineer sh	ngineer, req all possess	requirements, posit uires Educational a bachelors or high cialized training i	qualifications t er degree in an	to include "A Engineering		
8	10 Recommend	ed Action(s); 🖸 Remedi	al 🖾 Investigative 🗌	Corrective			
Б О		individua	ls actually	F&S QA and technic possess the require criptions where suc	d degree credent	ials specified		
Ž	11 QAE/Lead Au			h Manager / Date		ality Mgr. Date		
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Block 8 Requirement (cont'd)

Requirement No. 2 PP-60-01- Rev. 0, "Personnel Selection & Indoctrination" Para. 6.1 states in part: Each Manager and Supervisor shall compare the education, experience, and training against those specified in the position description and NNWSI Procedures. Only employees who meet the standard will be utilized to perform activities that affect quality. The Managers and Supervisors will certify that requirements have been met in the format specified in Attachment 1. A copy of this shall be sent to Central Files.

Block 9 Deficiency (cont'd)

The subject individual was certified as having met the educational requirements by the Director of QA on 9/16/87. A review of the SR. QA Engineer education requirement indicates that the individual possess a "Masters of Arts (MA) and <u>Bachelor</u> of Arts B.A." which does not comply with the position description or certification of verification of education as detailed by the Director of QA.

Block 10 Recommended Action(s) (cont'd)

Evaluate the impact on quality for those personnel who have not met the educational portion of the position description and determine if the lack of degree requirement has affected the quality of activities to which they have and are performing. Submit to this office a list, by title, of those personnel who have not met the degree requirements specified in the position description the tasks performed and identified what action has or will be taken including (date to correct and to prevent this condition from recurring.)

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0 80	F&S	D. Tunney	, T. McCracken	Date of T	ng Days from ransmittal			
Originating Q	8 Requirement (Audit Ch 1. PP-10-02, Rev. 0 Subparagraph 4.	 8 Requirement (Audit Checklist Reference, if Applicable) 1. PP-10-02, Rev. 0, "Training on NNWSI Procedures," Para. 4.0, Definitions, Subparagraph' 4.1, Training, states "In depth instruction provided to (cont'd) 						
à	9 Deficiency Contrary to the above requirements a review of the personnel file does not provide objective evidence of the standard training the subject individual is required to receive. (cont'd)							
Completed	10 Recommended Action Establish training concerning required in Requirement completed the aforement	ourse applicat ent No. 3. Pr	I investigative in Co ole to the subject ind rovide objective evider ping (cont'd)	ividuals discipl	ine as ividual has			
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WMPO STANDARD DEFICIENCY REPORT CONTINUATION SHEET

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Block 8 Requirement (cont'd)

personnel to develop and demonstrate initial proficiency in the application of selected requirements, methods, and procedures, and to adapt to changes in technology, methods, or job responsibilities (NVO-196-17)."

2. PP-10-02, Rev. O, "Training on NNWSI Procedures," Para. 5.2, states "Each Department Manager is responsible for training his subordinates or in the case of the staff who report to the Project Manager, the PM shall be responsible for training those personnel."

3. PP-10-02, Rev. O, "Training on NNWSI Procedures," Para. 6.1.1, Standard Training, states "A standard course of training shall be given on all the NNWSI procedures that are applicable to individual disciplines within each department, that are at the time enforced in the NNWSI Project Procedures Manual."

Block 9 Deficiency (cont'd)

Contrary to the above requirement a review of the Senior Hining Engineer's training file does not indicate by objective evidence that the subject individual was trained in NNWSI procedures applicable to the individual's discipline as stated in requirement No. 3, nor is there a method in place throughout the F&S organization (e.g., Tulsa, LV, and the NTS) which identifies the required standard training applicable to the individual disciplines.

It should be noted that the subject individual was certified by the F&S NNWSI Project Manager on 11/2/87 as having met the aforementioned training requirements.

Block 10 Recommended Action(s) (cont'd)

Evaluate and determine the extent of this condition.

Evaluate and determine what standard training courses are appropriate to individual disciplines within each department as stated in Requirement No. 3. Identify to the WMPO, by F&S department, the applicable training course requirements and content.

Identify to WMPO how F&S will correct this condition, and prevent its recurrance.

After the individual has completed the required training, re-certify the individual by the appropriate manager or supervisor.

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e e		· ·	D. Tunn	ey, M. Regen	da			ing Days fro Transmittal	-mc
Originating C	8 Requirement Selection and Supervisor sh	8 Requirement (Audit Checklist Reference , if Applicable) 1. PP-60-01, Rev. 0, "Personnel Selection and Indoctrination," Para. 6.2, states in part: "Each Manager and Supervisor shall compare the education, experience (cont'd)							
descriptions for both QA and technical personnel (e.g., ESF Design Engineers) does							ers) does		
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Block 8 Requirement (cont'd)

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and training against those specified in the position description and NNWSI procedures. Only employees who meet the standard will be utilized to perform activities that affect quality. The managers and supervisors will certify that requirements have been met in the format specified in Attachment 1. A copy of this shall be sent to Central Files."

2. PP-10-01, Rev. 0, "Personnel Selection and Indoctrination, "Attachment 1.A, Personnel Qualification Evaluation, states in part "Based on my personnel review of the individual's education, experience, and training compared to the employee's position description and NNWSI procedures, I certify this employee for the assigned task.

1.

Manager or Supervisor Date

Recommend Action(s) (cont'd)

from the procedure as stated above and identify to WMPO the procedure which will identify the required training an individual must receive prior to performing activities affecting quality.

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	1	Date 3/1/88		2 Se	everity Level	Ci 1 🖾 2	<u> </u>	Page 1 of 3	
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Originating O	1 8	 a Requirement (Audit Checklist Reference, if Applicable) 1. F&S QAPP-002, Rev. 2, Para. 17.1.1, states "A document is not considered to be a Quality Assurance Record until it satisfies the definition of a Quality (cont'd) 							
م		9 Deficiency Contrary to the above requirements, a review of position description documents for F&S Tulsa and NNWSI Project QA and technical personnel (e.g., Senior (cont'd)							
Completed	1(Recommended A 1. Submit list and department)	to WMF	PO of those		ent personne	el (e.	.g., name, title,	
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Requirment (cont'd)

Assurance Record as defined below.

The term records, used throughout this section is to be interpreted as Quality Assurance Records. Quality Assurance Records include individual documents that have been executed, completed, and approved and that furnish evidence of the quality and completeness of data (including raw data), and activities affecting quality; documents prepared and maintained to demonstrate implementation of quality assurance programs (e.g., audit, surveillance, and inspection reports); procurement documents; "other documents, such as plans, correspondence, documentation of telecons, specifications, technical data, books, maps, papers, photographs, and data sheets; magnetic media; and other materials that provide data and document quality regardless of the physical form or characteristics." A completed record is a document that will either receive no more entries or whose revision would normally consist of the reissue of the document; and is signed and dated by the organization and, as applicable, by personnel authorized to approve the document. Records will be distributed, handled, and controlled in accordance with written procedures.

2. PP-60-01, Rev. 0, Personnel Selection and Indoctrination, Para. 6.1, states "Each manager and supervisor shall establish, <u>document</u>, and <u>maintain</u> on file, position descriptions for their direct subordinates."

3. PP-60-01, Rev. 0, Personnel Selection and Indoctrination, Para. 6.2, states "The Director of Personnel, Las Vegas or a designee shall verify the education and experience of employees stationed in <u>Las Vegas</u> and at the <u>NTS</u>. The <u>Administrative Clerk/Personnel</u>, <u>Tulsa</u>, <u>shall verify the education and experience of employees stationed in Tulsa</u>. They will then use Attachment 1 to certify that this verification has been completed. This shall be sent to the cognizant manager or supervisor."

Each manager and supervisor shall compare the <u>education</u>. <u>experience</u>. and <u>training</u> against those specified in the position description and NNWSI Project procedures. Only employees who meet the standard will be utilized to perform activities that affect quality. The managers and supervisors will certify that requirements have been met in the format specified in Attachment 1. A copy of this shall be sent to Central Files.

4. F&S QAPP-002, Rev. 2, Section 17.0, Quality Assurance Records, Subparagraph 17.1.2.2, states in part "Sufficient records will be specified, prepared, and maintained to furnish documented evidence of activities that affect quality. The records will include at least the following: operating logs, the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses. Also, the records will include closely related data such as qualifications of personnel, procedures, and equipment." SDR No.

Rev. 0

Deficiency (cont'd)

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QA Engineers and QA Engineers) do not provide objective evidence that the subject position descriptions were established and documented by the applicable manager, QA Director, or supervisor as stated in Requirement No. 2.

These position descriptions which establish the basis for the certification of personnel performing quality affecting activities would be considered QA records and must be signed and dated by personnel authorized to approve the subject position description since the revision of these description(s) would normally consist of the reissue of the subject document.

The subject position descriptions must also be included in the personnel qualification files as required in Requirement No. 4 since it establishes the qualification requirements for the initial and continual basis for requalification of all individuals to perform activities which affect quality.

Recommended Action (cont'd)

required to develop per Requirement No. 2 and have the subject management personnel sign, date, and include revision numbers on the position description.

2. Establish a method to control the issues of position descriptions.

3. Include position description(s) as stated above in personnel qualification files, and retain such records as lifetime QA records.

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	F&SM. Regenda, T. McCracken20 Working Days from Date of Transmittal								
Originating QA	8 Requirement (Audit "Quality Assurance administration of the identification	8 Requirement (Audit Checklist Reference, if Applicable) F&S procedure NNWSI-DC-17, "Quality Assurance Records," Rev. 3, establishes requirements for the administration of F&S QA records generated by the Tulsa Design Office including the identification, storage, retention, and transmittal of appropriate (cont'd)							
	9 Deficiency Contrary to the above requirements, F&S Tulsa is not complying with the stated requirements in NNWSI-DC-17. "Review and Comment Records" (form 508-TUL-29) could not be located in the F&S Nevada Test Site (NTS) Records Center for any of the F&S Tulsa NNWSI-Design Control Procedures.								
Completed by	10 Recommended Act 1. Transmit F&S T Center in accordan	ulsa Design Off	lial 🛛 Investigative 🛛 Co fice completed QA record ral requirements. (con	ls to the NTS Records					
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CLOSURE

WMPO STANDARD DEFICIENCY REPORT N-QA-038 10/86 CONTINUATION SHEET SDR No. 116 Rev. 0 2 Page of

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Block 8 Requirement (cont'd)

records to permanent storage.

Paragraph 6.2.2 of the procedure requires that F&S QA records generated in Tulsa be transmitted to Las Vegas within 30 days after the record becomes complete.

Block 9 Deficiency (cont'd)

Discussion:

During follow-up of corrective actions committed to previously generated SDR No. 066, Rev. O, which stated that no QA records had been generated by the F&S Tulsa Design Office, it was observed during the audit that QA records had been previously generated by the Tulsa Design Office and were transmitted to the NTS Records Center for further processing prior to the date of the F&S response (9/16/87) to SDR-066.

Examples:

F&S	Transmittals	FS-NNWSI-0250	dated	7/6/87
		FS-NNWCI-0235	dated	6/22/87
		FS-NNWSI-0127	dated	4/3/87
		FS-NNWSI-0192	dated	5/12/87
		FS-NNWSI-0191	dated	5/12/87

Block 10 Recommended Action(s) (cont'd)

- 2) Revise the time frame established in NNWSI-DC-17 if 30 days is not a realistic time frame to transmit completed QA records to the NTS Records Center.
- 3) Reinstruct appropriate personnel to procedural requirements. Provide objective evidence.