

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

22/40

CORRECTIVE ACTION REQUEST

CAR No: 2002-1

Associated AR, SR, NCR No: N/A

PART A: DESCRIPTION OF CONDITION ADVERSE TO QUALITY

CNWRAs Operations Plans for the Repository Program, Revision 16, Change 1, was not given a technical review in accordance with QAP-002, Review of CNWRA Documents, Reports and Papers.

Initiated by: 

Date 3/11/2002

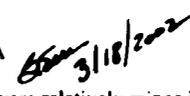
PART B: PROPOSED ACTION

Responsible Individual: B. Sagar
Response Due: 4/8/2002

1) **Extent of Condition:** A sampling of previously submitted changes to the Repository Program Operations Plans also showed that these had not been through a technical review prior to submittal to the client. Changes reviewed were Revision 13, Change 2, August 1999; Revision 14, Change 1, December 1999; Revision 15, Change 3, May 2001.

2) **Root Cause:** Inflexibility of QAP-002 for minor reviews that do not materially affect a document, in which an Element Manager or Director should be able to decide whether to conduct a technical review.

3) **Remedial Action:**

Proposed Completion Date: N/A 

Since the changes to the CNWRA Repository Operations Plans were directed by the client (U.S. NRC) and ~~in most cases~~ were relatively minor in nature (e.g., schedule changes, editorial wording, etc.), the final products of the CNWRA were not affected. Therefore no remedial actions are required.

4) **Corrective Action to Preclude Recurrence:**

Proposed Completion Date: 4/19/2002

Revise QAP-002 to provide mechanisms for responsible management to tailor the review process to address specific project and CNWRA needs.

Element Manager: 

Date: 3-15-2002

PART C: APPROVAL
Comments/Instructions

Director of QA: 

Date: 3/18/2002

PART D: VERIFICATION OF CORRECTIVE ACTION IMPLEMENTATION

QAP-002 Revision 7 Change was effective on 4/4/02. This revision allows for a brief justification by the Element Manager for any less review than specified in the Review Requirements Matrix Table (QAP-002 Para 4.2.2).

Distribution:
Original-CNWRA/QA DIRECTOR QA Records
ORIGINATOR
PRINCIPAL INVESTIGATORS
ELEMENT MANAGERS
TECHNICAL DIRECTOR
CNWRA PRESIDENT

Verified by:  Date: 4/9/02



CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES
DOCUMENT REVIEW REQUEST AND TRANSMITTAL CONTROL (CF. QAP-002)

2 of 2

I. DOCUMENT INFORMATION

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a. TITLE: CNWRA Operations Plans for the Repository Program (Rev.16, Change 1)

b. DOCUMENT TYPE

<input type="checkbox"/> Abstract	<input type="checkbox"/> Presentation/Poster	<input type="checkbox"/> Project/Test Plan	<input type="checkbox"/> AP	<input type="checkbox"/> TOP	<input type="checkbox"/> Technical Report (Publication)
<input type="checkbox"/> Peer-Reviewed	<input checked="" type="checkbox"/> OPs Plans	<input type="checkbox"/> CQAM	<input type="checkbox"/> QAP	<input type="checkbox"/> Proposal	<input type="checkbox"/> NRC Guidance

* Conference/Journal Title: _____

Special Markings (such as "Predecisional" or "Proprietary")

Yes	_____	No	<u>X</u>
Yes	_____	No	<u>X</u>

Copyright Permission

c. PROJECT INFORMATION

Project No. 20.01402.158 Milestone No. 150 Subject Code 710.2

CNWRA DOCUMENT NO. Yes _____ No X Assigned No. CNWRA 2001 -

d. SCHEDULE Today's Date 2/18/2002 Scheduled Transmittal Date 2/21/2002

II. RESPONSIBILITIES (Fill in names on each blank line in this section.)

Author(s) Element Managers Element Manager Henry E. Garcia Assigned Secretary Lucy Gutierrez

III. REVIEW (See QAP-002 table 1 for applicable review types.)

Review Types & Reviewers Determined by Element Manager

Review Type	Reviewer(s)	Rec'd Date	Initials	Completed (Date)
<input type="checkbox"/> TECHNICAL (Attach CNWRA form QAP-12.)	Reviewer(s): Not Required			
<input type="checkbox"/> PEER (Attach CNWRA form QAP-13.)	Reviewer(s):			
<input type="checkbox"/> EDITORIAL	Reviewer:			
<input checked="" type="checkbox"/> CONCURRENCE	Reviewer: B. Sagar -	<u>2/18/02</u>	<u>BS</u>	<u>2/15/2002</u>
<input checked="" type="checkbox"/> QA	Reviewer: (Includes QRAM Review) B. Mabrito	<u>2/20/02</u>		
<input checked="" type="checkbox"/> PROGRAMMATIC/COPYRIGHT PERMISSION	Reviewer: W. Patrick	<u>2/20/02</u>		
<input checked="" type="checkbox"/> FORMAT	Reviewer/Style: B. Caudle			
Verification of Compliance with QAP-002				

CNWRA calculations and analyses supporting this report are documented in Scientific Notebook(s): N/A

IV TRANSMITTAL

TO: B. Meehan FROM: W. Patrick

COPIES TO: (Add/delete names as required using current information in "Guidelines for Minimum Distribution of CNWRA Correspondence.")

Distribution (listed below)

**CENTER FOR NUCLEAR WASTE
REGULATORY ANALYSES**

Proc. QAP-002

Revision 7 Change 0

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QUALITY ASSURANCE PROCEDURE

4.1.4 Editing shall be conducted as shown in Table 1. As indicated, certain types of documents may be edited at the discretion of the Element Manager. Documents that require editing will be submitted to the CNWRA or Southwest Research Institute (SwRI) Publications staff member responsible for editorial coordination.

4.1.5 Editing shall consist of (i) review by the editor; (ii) discussion of the review results between the editor and author, as necessary; and (iii) appropriate modification of the document. Editing should be completed before additional word processing or reviews are performed.

4.2 Review Planning

4.2.1 The "Document Review Request and Transmittal Control," CNWRA Form AP-6, (Figure 1) shall be completed, signed, and dated by the Element Manager. The document type shall be one of the review item categories identified in Table 1, Review Requirements Matrix. The Element Manager shall identify whether special markings (e.g., predecisional) are required for the document. From the Review Requirements Matrix, the Element Manager shall check the required review types on the AP-6 form. The review process may be tailored taking into consideration the complexity of the document, report-writing skill level of the authors(s), client needs, and contractual commitments.

4.2.2 For revisions and changes to previously submitted documents, review may not be required for a revision/change that does not materially affect the intent or content of the document (e.g., editorial and clarification). The AP-6 form shall include a brief justification by the Element Manager for any review less than that in the Review Requirements Matrix Table.

4.2.3 A Peer Review may be required if the adequacy of information (e.g., data, interpretations, test results, design assumptions, etc.) or the suitability of procedures and methods important to licensing cannot otherwise be established through testing, alternate calculations, or reference to previously established standards and practices. In general, the following conditions are indicative of situations in which a Peer Review may be required:

- Critical interpretations or decisions will be made in the face of significant uncertainty or subjective judgment, including the planning for data collection, research, or testing.
- Interpretations having significant impact on licensing decisions will be made.