

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

23/66

CORRECTIVE ACTION REQUEST

CAR No: 99-1

Associated AR, SR, NCR No: CNWRA Audit 99-1

PART A: DESCRIPTION OF CONDITION ADVERSE TO QUALITY

The Quality Requirements Application Matrices have not been reviewed since the last revision has been made to the CNWRA operation plans.
Ref. QAP-013, Para. 3.1.4

Initiated by: R. Weber *Ra*

Date 6/11/99

PART B: PROPOSED ACTION

Responsible EM: B.E. Mabrito *SEM*

Response Due: 7/12/99

1) Extent of Condition:

See attached page.

2) Root Cause:

See attached page.

3) Remedial Action:

See attached page.

Proposed Completion Date:

See attached page.

4) Corrective Action to Preclude Recurrence:

See attached page.

Proposed Completion Date:

See attached page.

Element Manager:

Date:

7/8/99

PART C: APPROVAL
Comments/InstructionsReviewed by *Dir* 13/04/99President CNWRA
Director of QA:

Date:

7/12/99

PART D: VERIFICATION OF CORRECTIVE ACTION IMPLEMENTATION

Distribution:

CNWRA Element Managers
Directors
President

M. Ekstrom/30

(all w/o attachments, which are in
QA Records Room - CAR Folder)

Verified by:

Date:

12/31/99

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CORRECTIVE ACTION REQUEST NO. 1

The Quality Requirements Application Matrices have not been reviewed since the last revision has been made to the CNWRA operation plans. (QAP-013, Para 3.1.4)

Extent of Condition: Revisions and changes to the Quality Requirements Application Matrices (QRAMs) have not been properly documented during interim changes to the CNWRA Operations Plans (OPS) and proposals. Revisions and changes to the QRAMs have occurred at the beginning of the fiscal year when the newly revised CNWRA OPS is presented to the NRC and when new research areas within a Key Technical Issue are developed. Even though the QRAM was not updated, the new activities were executed under the CNWRA Quality Assurance program.

Root Cause: Lack of documenting the review of the QRAMs when interim changes to the OPS occurred, primarily because the QRAMs are not treated as an integrated package with the changes, review sheets and effectivity pages of the associated OPS and proposals.

Remedial Action: Changes made to the various CNWRA OPS and proposals in FY1999 will be evaluated to determine whether any QRAMs need to be revised. If a change has affected a previously issued QRAM, that QRAM will be immediately updated and the CNWRA Director of QA will determine if any other action is required. In either case, the Director of CNWRA QA will document the result of the reviews by memorandum to the CNWRA management team, principal investigators and the QA Records file.

Proposed Completion Date: July 26, 1999

Corrective Action to Preclude Recurrence: Procedure QAP-013 will be changed to emphasize that Element Managers are responsible for notifying the Director of CNWRA QA when changes to the CNWRA OPS or proposals affect scope of work. It will be the responsibility of the Element Manager (EM) to present the updated QRAM to the Director of CNWRA QA for review and approval. As an aid to the EMs, the QRAM form will be included in a "package" that EMs are presented along with the AP-6 form and other appropriate forms as part of CNWRA OPS and proposal review packages.

Proposed Completion Date: August 23, 1999

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CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

MEMORANDUM

December 30, 1999

TO: QA Records Corrective Action Request 99-1 File

FROM: Bruce Mabrito, Director of Quality Assurance 

SUBJECT: Closure of CAR 99-1 / Quality Requirements Application Matrix Reviews

REFERENCE: CAR 99-1 from Annual CNWRA QA Audit

This memorandum to the Corrective Action Request 99-1 file is to document closure of this CAR.

The final required actions to close out CAR 99-1 have now taken place. Several different initiatives have been taken to address this issue. Actions taken to this date are listed below.

1. On July 19, 1999, a memorandum concerning the possible impact on Quality Requirements Application Matrices not being evaluated when revision and changes were made to Operations Plans, Project Plans, and proposals was distributed to key CNWRA staff. The review noted that although some revisions to QRAM forms were not accomplished, CNWRA QA staff always did review for changes to QA commitments which is part of the reason to complete QRAM forms.
2. Quality Assurance Procedure-013, Quality Planning, Revision 3, became effective July 27, 1999. Changes included more clear instructions to CNWRA staff on completing the Quality Requirements Application Matrix (QRAM) forms, placing the responsibility on each Element Manager. The QRAM forms are now on the G:Drive and are accessible to all CNWRA staff members to fill out "on line."
3. The CNWRA QA Manual (CQAM), Revision 3, was issued September 27, 1999 and the CQAM emphasizes the importance of the QRAM method of planning for the purposes of project management, surveillances and audits.
4. The importance of completing QRAM forms for initial and revised Operations Plans has been emphasized to the CNWRA Element Managers by the Technical Director and they have responded well in the latest round of Operations Plans and changes to Operations Plans. One-on-one QRAM training took place with each EM during preparation for the FY2000 Operations Plans.

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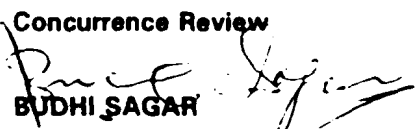


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5. Blank QRAM forms have been provided to the Element Managers and Principal Investigators in the CNWRA comment and review packages with specific encouragement of the Technical Director and QA Director.
6. On December 30, 1999, the CNWRA proceduralized the QRAM process by issuing changes to two Operating Procedures. QAP-002, Review of CNWRA Documents, Reports, Papers and Presentation Materials, Revision 6 Change 1, was issued and incorporates the QRAM forms in the review package for Operations and Project Plans and proposals. QAP-013, Quality Planning, Revision 3 Change 1, was issued and incorporates language requiring the CNWRA QRAM forms be completed for Operations Plans, Project Plans, and proposals and submitted with the entire review package.
7. The current CNWRA FY2000 Surveillance Schedule was developed by using the completed QRAMs and was beneficial in providing the background on each task so the timing of surveillances can be properly linked to the appropriate activity being performed.
8. In a recently received NRC letter directing changes to the CNWRA Operations Plans, specific instructions were provided as to how to modify the Operations Plans. A copy of that NRC letter has been inserted into the QRAM "Red Book" to provide full justification for the Ops Plan changes as directed by the client.

Based on the above actions, which includes the corrective actions to preclude recurrence listed in the initial response to CAR 99-1, this CAR should be closed.

Attachments/
(including cover pages for the CQAM, QAP-013, etc.)

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CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES		Proc. QAP-013 Revision <u>3</u> Page <u>1</u> of <u>5</u>	
QUALITY ASSURANCE PROCEDURE			
Title <p style="text-align: center;">QAP-013 QUALITY PLANNING</p>			
EFFECTIVITY AND APPROVAL			
Revision <u>3</u> of this procedure became effective on <u>7/27/99</u> . This procedure consists of the pages and changes listed below.			
<u>Page No.</u> All	<u>Change</u> 0	<u>Date Effective</u> 7/27/99	
UNCONTROLLED			
Supersedes Procedure No. QAP-013, Rev. 2			
Approvals			
Written By  MARK EHNSTROM	Date 7/30/99	Concurrence Review  BUDHI SAGAR	Date 7/30/99
Quality Assurance  BRUCE MABRITO	Date 7/30/99	Cognizant Director  HENRY GARCIA	Date 7/30/99

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**CENTER FOR NUCLEAR WASTE
REGULATORY ANALYSES**

QUALITY ASSURANCE MANUAL

Section i

Revision 3 Change 0

Page i.1 of i.3

**CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES
QUALITY ASSURANCE MANUAL**

Statement of Policy

It is the policy of the Center for Nuclear Waste Regulatory Analyses (CNWRA) to ensure that the services provided to the U.S. Nuclear Regulatory Commission (NRC) conform to the Charter, the CNWRA Contract, and applicable codes, standards and specifications. This policy extends to the work of the CNWRA for clients other than the NRC, to the extent applicable. Conformance to this policy is ensured through this CNWRA Quality Assurance Manual (CQAM), CNWRA procedures, and appropriate Southwest Research Institute (SwRI) Operating Policies and Procedures.

This CQAM describes the quality assurance (QA) program established at the CNWRA to comply with applicable Title 10, Code of Federal Regulations, Part 50, Appendix B (hereinafter referred to as "Appendix B") requirements. In recognition of the importance of this requirement, the President of the CNWRA hereby delegates to the CNWRA Director of QA the authority for maintaining this CQAM and the CNWRA QA program as they relate to CNWRA activities.



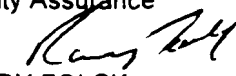

Approved: _____

Date

Wesley C. Patrick
President
Center for Nuclear Waste Regulatory Analyses





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CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES		Proc. <u>QAP-002</u> Revision <u>6</u> Page <u>1</u> of <u>17</u>	
QUALITY ASSURANCE PROCEDURE			
Title QAP-002 REVIEW OF CNWRA DOCUMENTS, REPORTS AND PAPERS			
EFFECTIVITY Revision <u>6</u> of this procedure became effective on <u>8/11/98</u> . This procedure consists of the pages and changes listed below.			
Page No.	Change No.	Date Effective	
1-2	1	12/31/99	
3-6	0	08/11/98	
7	1	12/31/99	
8-13	0	08/11/98	
14	1	12/31/99	
15	0	08/11/98	
<i>B. Mabrito</i>			
Supersedes Procedure No. QAP-002, Rev 6, Chg 0 dated 8/11/98			
Approvals			
Written by  BRUCE MABRITO	Date <u>12/30/99</u>	Technical Review  NARASI SRIDHAR	Date <u>12/30/99</u>
Quality Assurance  RANDY FOLCK	Date <u>12/30/99</u>	Cognizant Director  HENRY GARCIA	Date <u>12/30/99</u>

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CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES		Proc. QAP-013 Revision <u>3</u> Page <u>1</u> of <u>5</u>	
QUALITY ASSURANCE PROCEDURE			
Title QAP-013 QUALITY PLANNING			
EFFECTIVITY AND APPROVAL			
Revision <u>3</u> of this procedure became effective on <u>7/27/99</u> . This procedure consists of the pages and changes listed below.			
<u>Page No.</u>	<u>Change</u>	<u>Date Effective</u>	
1	1	12/31/99	
2	1	12/31/99	
3	1	12/31/99	
4-5	0	7/27/99	
CONTROLLED COPY			
Supersedes Procedure No. QAP-013, Rev. 3, Chg 0			
Approvals			
Written By  BRUCE MABRITO	Date 12/30/99	Concurrence Review  NARASI SRIDHAR	Date 12/30/99
Quality Assurance  RANDY FOLCK	Date 12/30/99	Cognizant Director  HENRY GARCIA	Date 12/30/99

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CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

July 19, 1999

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TO: Corrective Action Request File

From: Bruce Mabrito 
Mark R. Ehnstrom

Subject: Evaluation of possible impact on Quality Requirements Application Matrices based on changes to CNWRA Operations Plans, Project Plans, and Proposals.

During the annual audit of the CNWRA, Corrective Action Request No. 1 was issued to document the fact that the Quality Requirements Application Matrix (QRAM) were not evaluated when revisions and changes were made to Operations Plans, Project Plans, and proposals. Operating Plans, Project Plans, and proposals may require a new QRAM because of an expanded scope of work, or if activities in the area requires a special QA response. On July 14, 1999 a review was performed on revisions and changes made to Operating and Project Plans since the beginning of the FY 99, to determine if the change or revision had impacted a previously issued QRAM. The following list identifies the plans in which revisions/changes were made and are included in this review.

PLAN TITLE	REV/CHG	DATE OF ISSUE
CNWRA Operations Plan for the Repository Program	13 1	03 99
	13 0	02 99
	12 1	02 99
	12 0	12 98
	11 0	10 98
CNWRA Management Plan	7 0	04 99
Operations Plan for Technical Assistance Related to Tank Waste Remediation System	2 1	12 98
	2 0	10 98
Operations Plan for Technical Assistance on Department of Energy Aluminum Based Spent Nuclear Fuels Disposition Program	1 1	05 99
	1 0	10 98
Operations Plan for Technical Assistance to the Spent Fuel Project Office on NWPA-Related Projects	1 10	06 99
	1 9	04 99
	1 8	03 99
	1 7	12 98
	1 6	10 98

The review found that in four cases (those changes dated in October 1998) plans had QRAMs dated after the change had occurred indicating they were updated or were complete. In the remaining eleven cases, documentation exists which shows that the Director of CNWRA QA, while reviewing the revision change, determined that the revision or change did not make a "change to QA commitments previously made". These statements, made by the Director of CNWRA QA were either documented on Form QAP-6, QA Document Review, or on Form TOP-3, CNWRA Report Review Comment Resolution Record. Though QRAMs were not evaluated during the time of issue for each review/change, this review shows that evaluations were made. These evaluations would have identified that if a major change had occurred in work scope or activity, proper QA activity would have taken place and necessary changes to QA documents would have been made.

PROPOSAL TITLE	DATE OF ISSUE
UR Proposal: Addition of Task Order 05: Technical Support for Six Inspections of Title II Sites	10 98
UR Proposal: Addition of Task Order 06: Technical Support for Consolidation of 10 CFR Part 20 Guidelines for Uranium Recovery Facilities	10 98
UR Proposal: Addition of Task Order 07: Technical Support in Preparing and Evaluating a Baseline Risk-Informed Performance-Based Approach For In Situ Leach Uranium Extraction	11 98
Revision to Proposals for FY-1998 UR Proposals 05 and 07	12 98
Variations of Drift Stability at the Proposed Yucca Mountain Repository	01 99
Linking Geologic and Real-Time Observation During Volcanic Crisis to Assist the Pacific Disaster Center	02 99
Proposal Modification No.11 to Task Order No.2 Under Contract NRC-20-97-001, "Technical Assistance for Receiving License Submittals Concerning Decommissioning"	5 99
Technical Assistance On Review Of Puducah Seismic Hazard Study	06 99

Again, the review found that the Director of CNWRA QA was reviewing the proposals for possible quality concerns and had documented this review on the before mentioned forms. In the development of the database used for this review, a number of IR & D projects were identified. These projects were excluded from the review because typically QA is not applied to IR & D projects.

cc: W. Patrick
CNWRA Directors
CNWRA Element Managers
CNWRA Affected Pls
D. Dunavant (30)

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QA Memos

Date: 8/19/99
Sender: Bruce Mabrito
To: #DIRS-MGRS
cc: #SA-WO_SUPPORT, blong@swri.edu
bcc: mehnstrom@swri.org
Priority: Normal
Subject: QRAM Forms Integrated into the Ops Plan Development Process

To those writing segments for the FY2000 Ops Plans:

Lucy Gutierrez will be notifying you when your Ops Plan sections have been put on the G:Drive for preparing your input.

Included with the electronic package you "pick up" from the G:Drive will be a CNWRA Form QAP-17, Quality Requirements Application Matrix (QRAM). You must complete one of these forms for each task or subtask (it depends on how complex or different each subtask is). It is essentially a fill-in-the-blank form and I do ask you to either describe the task/subtask on the form directly (where there is space to do so), or reference the pages in your section (it is preferable to type in the description because of ease of reading). Also, if you do NOT believe a scientific notebook should be used on a task or subtask, please so state in section 1, and note the scientific and engineering software that you will be using, if any.

Submit your completed QRAM with your Ops Plan text, and initial and date near where your printed name is near the top of the first page ("Element Manager _____"). Budhi and I will review the QRAMs, get back with you if more information is needed, and sign them if it is complete. EMs and PIs will receive a package of their own signed and approved QRAM forms. Call me if you have questions.

Bruce x 5149.

CENTER FOR NUCLEAR WASTE
REGULATORY ANALYSES

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QUALITY REQUIREMENTS APPLICATION MATRIX

Task/Subtask Title: _____

OPS Plan/Proposal Title: _____

Revision & Change/Date: _____

Project No: _____ Element Manager: _____

Principal Investigator: _____ Plan/Proposal Rev/Chg.: _____

Task/Subtask Description: _____

1. Generally Applicable Quality Requirements:

QAP-001 Scientific Notebook Control - Determined by EM or Project Manager

QAP-002 Review of CNWRA Documents, Reports, Papers, and Presentation Materials

Additional QAPs required:

QAP-004 Surveillance Control

QAP-005 Quality Indoctrination Training

QAP-007 Professional Personnel Qualification

QAP-008 Document Control

QAP-009 Nonconformance Control

QAP-010 Corrective Action

QAP-012 QA Records Control

QAP-013 Quality Planning

Other QAPs: _____

2. Quality Requirements Applicable to specific Activities:2.1 Systematic Regulatory Analysis:

TOP-001-11	Development of Compliance Determination Strategies	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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TOP-001-13	Development of Compliance Determination Methods	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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TOP-001-15	PADB Loading, Version, and Change Control	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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2.2 Laboratory and Field Investigations:

TOP-012	Identification, Control, Storage, Handling, Shipping, and Archiving of Samples	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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CQAM Ch.12	Control of Measuring and Test Equipment	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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NOTE: This QAP-17 Form is being provided in OPS
Plan Review packages and has been made available
on the G-Drive. JSW 12/22/99

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

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QUALITY REQUIREMENTS APPLICATION MATRIX

2.3 Development and Use of Scientific and Engineering Software:

For software that are expected to be used directly in regulatory reviews:

TOP-018 Development and Control of Scientific and Engineering Software

☐ Yes ☐ No

List of software subject to these requirements and approximate schedule for implementation:

If non-controlled Scientific and Engineering Software are used, a copy of the software itself and input/output files for specific applications in a deliverable will be maintained as a QA Record; if controlled software are used in this task, all input files and appropriate sample output files will be provided to the QA Records folder and retained as a QA Record.

2.4 Data and Data Analyses:

For data that are expected to be used directly in regulatory reviews:

QAP-015 Qualification of Existing Data

☐ Yes ☐ No

QAP-014 Documentation and Verification of Scientific & Engineering Calculations

☐ Yes ☐ No

List data subject to qualification and approximate schedule for implementation:

List data exempted from qualification in accordance with QAP-015, 5.1.3:

Exemption Approvals: _____
Technical Director Date QA Director Date

3.0 Approval:

Technical Director

Date

Director QA

Date

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CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

MEMORANDUM

November 24, 1999

TO: CNWRA Management
(Includes All Directors and Element Managers)

FROM: Bruce Mabrito, Director of Quality Assurance

SUBJECT: FY2000 Surveillance Schedule



The attached CNWRA Fiscal Year 2000 Surveillance Schedule provides the latest plan for monthly Quality Assurance (QA) surveillances to be performed. This schedule was compiled by reviewing the Operations Plans currently in place at the CNWRA and determining the activity level in each task. Since this is a plan, it is subject to change based on both QA and CNWRA project activity.

Please review this plan and let me know if there are any additions, deletions, or changes that you would like to see. As in the past, QA personnel will contact the principal investigator prior to any surveillance activity. Preliminary findings will also be discussed prior to writing the surveillance report to avoid any confusion.

Again, if you have any questions regarding this surveillance schedule or related activity, please contact me at ext. 5149.

NOTE: This CNWRA Surveillance Schedule utilized the completed QRAMS to determine when activities should best be checked. Ben

Attachment

cc: W. Patrick
M. Ehnstrom/30
QA Records 181

CNWRA MONTHLY SURVEILLANCE SCHEDULE FOR FY00 THROUGH SEPTEMBER 2000
Revised Based on Current Operations Plans

Date	Number	Task	Principal Investigator
November 1999	20.01402.861	KTI Unsaturated and Saturated Flow Under Isothermal Conditions Technical Assistance	J. Winterle
December 1999	20.01402.159	Critical Equipment Surveillance	M. Ehnstrom/Surveillance
	20.01402.	Key Technical Issues- CDOCS Technology/Development Transfer	H. Garcia
	20.01402.159	Software Surveillance/Specifics To Be Determined	R. Folck/Surveillance
	20.01402.	Key Technical Issues- Licensing Support System Pilot Program	H. Garcia
January 2000	20.01977.001	West Valley Demonstration Project	P. Mackin
	20.08910.000	American Gas Association - Thermodynamics Modeling	N. Sridhar
	20.08910.002	American Gas Association - Corrosion Tests	N. Sridhar
	20.08910.003	American Gas Association - Analyses of Corrosion Products	N. Sridhar
	20.08910.004	American Gas Association - Planning and Reporting	N. Sridhar
February 2000	20.01136.001	Gas Research Institute - Survey of Literature and Field Experience	N. Sridhar
	20.01136.002	Gas Research Institute - Development of Software Module for Speciation	N. Sridhar
	20.01136.003	Gas Research Institute - Development of Modified GEM Model	N. Sridhar
	20.01136.004	Gas Research Institute - Experimental Determination of Solution Chemistry	N. Sridhar

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CNWRA MONTHLY SURVEILLANCE SCHEDULE FY00 (Cont'd)
Revised Based on Current Operations Plan

Date	Number	Task	Principal Investigator
	20.01136.005	Gas Research Institute - Development of Steady-State Model	N. Sridhar
	20.01136.006	Gas Research Institute - Report and Management	N. Sridhar
	20.01402.471	Structural Deformation and Seismicity	L. McKague/J. Stamatakis
March 2000	20.01402.561	Evolution of the Near Field Environment	E. Percy
	20.01402.159	Software Surveillance/Specifics To Be Determined	R. Folck/Surveillance
	20.01402.761	Total System Performance Assessment and Integration	G. Wittmeyer/S. Mohanty
April 2000	20.01402.159	Professional Personnel Qualification Record Surveillance	B. Mabrito/Surveillance
	20.01402.159	Chemical Shelf Life Surveillance	B. Mabrito/Surveillance
	20.01402.931	Draft Environmental Impact Statement Evaluation Report Supplement	P. Mackin
	20.01402.951	Yucca Mountain Review Plan	P. Mackin
May 2000	20.01405.021	Dry Transfer System Safety Evaluation Report-Draft Letter Report	A. Chowdhury
	20.01402.159	Software Surveillance/Specifics To Be Determined	R. Folck/Surveillance
	20.01405.041	Draft Final Report On The Safety Evaluation Report Supplemental	A. Chowdhury/A. Ghosh
	20.01405.051	Safety Evaluation of ISFSI-2 at INEEL	A. Chowdhury

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CNWRA MONTHLY SURVEILLANCE SCHEDULE FOR FY00 (Cont'd)
Revised Based on Current Operations Plans

Date	Number	Task	Principal Investigator
	20.01405.061	Safety Evaluation of ISFSI at Humboldt Bay	R. Chen
	20.01405.071	Safety Evaluation of ISFSI at Diablo Canyon	J. Stamatakis
	20.02562.001-.003	PRCI Corrosion Tests	N. Sridhar/O. Moghissi
June 2000	20.01402.159	Surveillance on Audits Performed by SwRI	B.Mabrito
	20.01402.462	PVHView Users Guide and Code-Letter Report	L. McKague/C. Connor
	20.01402.571	Container Life and Source Term	N. Sridhar
	20.01402.661	Thermal Effects on Flow	A. Chowdhury/D. Hughson
	20.01402.771	Activities Related to Development of the NRC High-Level Waste Regulations	G.Wittmeyer
July 2000	20.01402.861	Unsaturated and Saturated Flow Under Isothermal Conditions	E. Percy/J. Winterle
	20.01402.871	Radionuclide Transport	E. Percy/D. Turner
	20.01403.102	Waste Solidification and Process Experience	N. Sridhar/V. Jain
	20.01403.106	Assessment of Chemistry and Chemical Processes Relevant to Hanford Tank Waste Remediation System Safety Issues	N. Sridhar/R. Pabalan

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CNWRA MONTHLY SURVEILLANCE SCHEDULE FY00
Revised Based on Current Operations Plan

Date	Number	Task	Principal Investigator
August 2000	20.01405.031	Assessment of a Topical Safety Analysis Report (TSAR) for the Storage of Spent Nuclear Fuel in a Centralized Interim Storage Facility	A. Chowdhury/A. Ghosh
	20.01402.461	Igneous Activity	L. McKague/B. Hill
	20.01402.671	Repository design and Thermal-Mechanical Effects	A. Chowdhury/S. Hsiung
September 2000	20.01402.159	Software Surveillance/Specifics To Be Determined	R. Flock/Surveillance
	20.01402.762	TPA Version 4.0 Code	G. Wittmeyer/S. Mohanty
	20.01402.941	Public Outreach	G. Wittmeyer
	20.01402.953/ 953	Yucca Mountain Review Plan	P. Mackin
	20.01602.011	Draft Regulation Analysis	P. Mackin

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CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

MEMORANDUM

December 31, 1999

TO: QA Records Corrective Action Request 99-1 File

FROM: Bruce Mabrito, Director of Quality Assurance 

SUBJECT: Delay in Closing of CAR 99-1

REFERENCE: CAR 99-1 from Annual CNWRA QA Audit

The original proposed completion date for Corrective Action Request 99-1 was set for August 23, 1999.

There was considerable delay in closing this CAR due to the following reasons.

First, the evaluation of the possible impact on Quality Requirements Application Matrices was not well received by some of the addressees and I felt more action needed to be taken.

Second, QAP-013, Quality Planning, was first revised in July 1999 and later changed in December 1999 to reflect changes in CNWRA Quality Planning approaches.

Third, I wished to have the major round of Operations Plans worked up and through the QRAM process before we closed this CAR. There were some delays in the guidance provided by the NRC and that delayed closure.

Fourth, it was determined that QAP-002, Review of CNWRA Documents, Reports, Papers and Presentation Materials, should be modified to incorporate the QRAM process in the CNWRA management review of documents.

Based on the above, I delayed the closure of the CAR so that a thorough and appropriate response could be developed and implemented.