

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

## CORRECTIVE ACTION REQUEST

CAR No. 92-2

Associated AR,SR,NCR NO. AR 92-1

### PART 1: DESCRIPTION OF CONDITION ADVERSE TO QUALITY

In some instances training of Center personnel had not been conducted as required by the Center Quality Assurance Manual, Quality Assurance Procedure, or Technical Operating Procedures. See the attached for specific deficiencies.

Initiated by: D. W. Dunavant *DWD*

Date: 6/5/92

### PART 2: PROPOSED ACTION

Responsible Element Manager: B. Mabrito

a) Root Cause:

*response due 7/5/92*

*SEE ATTACHED PAGE 2.*

b) Corrective Action to Preclude Recurrence:

*SEE ATTACHED PAGE 2.*

Target Date for Completion: 7/15/92

Response provided by: Bruce Mabrito

Date: 6/15/92

### PART 3: APPROVAL

Comments/Instructions: *THERE WAS CONSULTATION WITH THE SWRI MANAGER OF QA BEFORE THIS PROPOSED ACTION WAS APPROVED.*

Director of QA: Bruce Mabrito

Date: 6/22/92

### PART 4: VERIFICATION OF CORRECTIVE ACTION IMPLEMENTATION

*Training to SWP-001-11 for G. Wittmeyer, B. Sagar, A. Delviscella, R. Baca, and W. Paterek was held 6/12/92. For NRC personnel Ed. Youngblood, M. Pedrin, P. Altman, J. Linahan, K. Kalman, K. McLaughlin, J. Holovich, K. Hooks, R. Johnson, R. Ballard, B. Mahren, and M. Lee was held 6/23/92. General SWP training was also provided to A. Delviscella and R. Baca on 6/12/92. K. Mahren received QA indoctrination on 6/24/92.*

Verified by: K. Burt

Date: 7/1/92

21

**CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES**

**Attachment to CAR No. 92-2**

Contrary to the requirements of TOP-001-011, paragraph 6.0 and QAP-005, paragraph 3.2, Center personnel Gordon Wittmeyer has been performing work to a Technical Operating Procedure without the required training in that procedure. Likewise, Tim Mahrer has performed work under the Center Quality Assurance Manual without receiving the required indoctrination in the Center Quality Assurance system. Discussions held during the audit indicated that the requirement for training was known by the personnel involved and that there are other instances of personnel operating to a Technical Operating Procedure (e.g., John Walton performing work in accordance with TOP-018) without training.

**Part 2: Proposed Action**

a) **Root Cause:** The condition identified as adverse to quality should be limited to personnel who have not yet received training to TOP-001-11, which specifically required training.

The lack of QA indoctrination of Ken Mahrer is an isolated incident, as evident from the audit which reviewed a large number of personnel and identified only one nonconformance (this issue is addressed in NCR 92-02, initiated 6/4/92 during the audit). John Walton's professed unfamiliarity with TOP-018 seems to conflict with the Software Summary forms that were completed by Walton in accordance with TOP-018, under the guidance of the Center QA staff (in essence, on-the-job training).

TOP-001-11 was issued 4/30/92, and training was provided to 19 Center staff from RDCO, GS, SE&I, EBS, IMS, and QA Elements, over the first two weeks of May. G. Wittmeyer reports to the PA/Hydrology Element, but is assigned to a GS activity associated with TOP-001-11. Since training was organized somewhat by Element, Wittmeyer was inadvertently overlooked for training.

b) **Corrective Action to Prevent Recurrence:** The SE&I Element shall identify all other personnel that may perform TOP-001-11 activities and provide training as necessary.

The QA Indoctrination noncompliance is isolated and no corrective action beyond that specified in NCR 92-2 is necessary.

CAR No. 92-1, addressing lack of implementation of TOP-018, shall address any training necessary to provide effective corrective action.