



Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

87-QSD-256

OCT 1 1987

Mr. A. N. Kugler, Project Manager
KE/PB
P. O. Box 23210
Oakland, California 94673

Dear Mr. Kugler:

CLOSURE OF AUDIT FINDING 8607-1, AUDIT CONCERN 8607-B, AND CLOSE OUT OF BASALT WASTE ISOLATION PROJECT (BWIP), KE/PB DESIGN CONTROLS, QUALITY ASSURANCE AUDIT 8607, APRIL 15-17, 1986

Verification of your corrective actions for the subject audit finding and audit concern has been completed satisfactorily. The closure of these final two deficiencies closes the audit file. This audit is now considered CLOSED.

Results of the verifications are as follows:

Finding 8607-1

Finding: The finding identified KE/PB's lack of an approved procedure for the collection, storage and maintenance of records as well as suitable provisions for record storage as required by NQA-1 (1983), Supplement 17.S-1.

Closure: This finding is closed based on the following:

1. KE/PB Procedures, 4.1, Rev. 3, "Records Management"; 6.8, Rev. 5, "Document Control"; and 6.23, Rev. 1, "QA Record Designation and Control" have now been developed, approved and issued for use. These procedures delineate KE/PB's Record Collection Storage and Maintenance Functions.
2. A Meilink MBF4 Class 350-1 hour ("C" Label) Four (4) drawer fire rated file cabinet has been ordered, delivered, inspected and accepted by KE/PB on June 18, 1987.
3. During September 21-22, 1987, (Verification of KE/PB corrective action in response to DOE audit #8702 Concern) T. K. Subramanian verified that KE/PB training records, KE/PB selected calculations from Study 10, as well as the retrievability strategy study and the rod consolidation study were stored in the fire proof file cabinet noted in Paragraph 2 above.

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PDR WASTE
WM-10 PDR

87279132
WM Project: WM-
PDR no
(Return to WM, 623-55)

WM Record File: 407.1
LPDR no

4. KE/PB "Project QA Plan", Rev. 10 (approved by DOE, 87-QSD-246, dated September 21, 1987), states in part that "...the maintenance of QA Records for BWIP is the responsibility of others. KE/PB shall transfer applicable QA Records to those responsible organizations..."

Since KE/PB transfers all completed records to BRMC for maintenance, current record storage arrangement (item 2) is considered satisfactory.

Concern 8607-B

Concern: There was no provision in the KE/PB QA program to address 10CFR60.73, "Reporting of Deficiencies."

Closure: During joint Audit 8702 by DOE-RL and Rockwell on April 7-10, 1987, corrective actions were reviewed and accepted by the DOE-RL audit team. Further discussion concerning this closure may be found in the Audit Report of 8702 issued June 1, 1987.

Any questions concerning this audit closure may be directed to T. K. Subramanian at (509) 376-3175.

Sincerely,

Jerry J. Adams
for Dallas W. Cooper
Contract Administrator

QSD:TKS

Enclosure

cc w/enclosure:

- D. C. Gibbs, WHC
- D. Stewart-Smith, Oregon State DOE
- B. Burke, Confederated Tribes of the Umatilla Indian Reservation
- R. Halfmoon, Nez Perce Indian Tribe
- R. Jim, Yakima Indian Nation
- A. Alkezweeny, On-Site Tribal Representative
- J. P. Knight, DOE-HQ
- J. J. Linehan, NRC
- T. Husseman, Washington State Department of Ecology
- D. Silver, Washington State Institute for Public Policy
- G. Faust, Weston



QUALITY AUDIT FINDING

9. QAF Control No.
8607-1

1. TO: Name Title
A. N. Kugler RKE, Project Manager

2. Location
RKE/PB Oakland, CA

3. Reference/Requirements
NQA-1, 1983, Section 17S-1, Paras 5 and 6 and Section 3S-1, Para 7.
(Control Subsystems 17.2 and 3.6)

4. Audit Or Surveillance Report No.

8607

5. Description

NQA-1 requires retrievability of records accumulated at various locations and also requires collection, storage and maintenance of design documentation and records to approved procedures. The intent of these requirements is to ensure that working documentation intended to become a record is protected in such a way that there is a high level of confidence that it will become a record. Contrary to the above, there is no approved procedure for the collection, storage and maintenance of records. Also the existing method of record storage does not satisfy the requirements of a single facility as defined in 17S-1, Para 4.4.1.

6. Lead Auditor (Signature)
John A. Hardy

7. Issue Date
April 17, 1986

8. Response Due Date
May 2, 1986

10. Audit Corrective Action Commitment

The audit finding is correct. Procedures will be generated that provide for identification and control of documents for record purposes. The insufficiency in record protection facilities was previously identified by RKE/PB and corrective action is pending concurrence from Rockwell/DOE to upgrade record storage facilities for in-process records (prior to final issuance with reports/design documents). Resolution requires participation/authorization of DOE. RKE/PB will request authorization to implement conformance action within 90 days of the date of audit finding.
NOTE: Action Shall Address Root Cause and Include Measures to Prevent Recurrence

11. Responsible Action Manager (Signature)
See attached KE/PB response

12. Date

13. Action Completion Due Date

ACTION VERIFIED

14. Lead Auditor (Signature)
W. B. Williams

15. Date
6-1-87

17. Final Distribution

ORIGINAL-Audit/Surveillance Report File

1--Addressee

2--

3--

16. Final Review and Approval (QAF Closed)
In reference to letter 87-QSD-256, dated 10/1/87.

R. P. Saget
R. P. Saget, Director of QSD
Mgr./Branch Chief, Cognizant Branch

10-1-87
Date



QUALITY AUDIT FINDING

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8607-1

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A. N. Kugler RKE, Project Manager

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3. Reference/Requirements
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NOTE: Action Shall Address Root Cause and Include Measures to Prevent Recurrence

11. Responsible Action Manager (Signature)
Charles S. Wilbur

12. Date
4/25/86

13. Action Completion Due Date

ACTION VERIFIED

14. Lead Auditor (Signature)
see page 1 of 2 of Quality Audit Finding

15. Date

17. Final Distribution

ORIGINAL-Audit/Surveillance Report File

1--Addressee

2--

3--

16. Final Review and Approval (QAF Closed)
Reference to letter 87-QSD-256, dated 10/1/87

(see page 1 of 2 for signature and date)
R. P. Saget, Director of QSD

Mgr./Branch Chief, Cognizant Branch

Date

WM Record File

10-1-7

WM Project

10

Docket No.

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Distribution:

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(Return to WM, 623-SS)

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