

2a Jim Kennedy / Jim Donnelly
MS 62355 - N20B

Kennedy /
Donnelly

DEPARTMENT OF ENERGY - RICHLAND OPERATIONS OFFICE
BASALT WASTE ISOLATION PROJECT
QUALITY SYSTEMS DIVISION SURVEILLANCE RECORD

SURVEILLANCE RECORD QSD-066

REVIEW AND COMMENT RESOLUTION PROCESS FOR THE DEVELOPMENT
OF THE SITE CHARACTERIZATION PLAN BY ROCKWELL

Prepared By:

Donella
ORIGINATOR

5/5/87
/DATE

Concurred by:

J E Mecca
COGNIZANT BRANCH CHIEF

5/5/87
/DATE

Concurred by:

N/A
COGNIZANT BRANCH CHIEF

/DATE

Approved by:

R.P. Saget
DIRECTOR, QUALITY SYSTEMS DIVISION

5/6/87
/DATE

[QA66D7.TM1]

8712030283 871014
PDR WASTE PDR
WM-10

BWI PROJECT SURVEILLANCE RECORD

SUBJECT OF SURVEILLANCE

REVIEW AND COMMENT RESOLUTION PROCESS FOR THE DEVELOPMENT OF THE SITE CHARACTERIZATION PLAN BY ROCKWELL

LOCATION: ROCKWELL HANFORD OPERATION, CDC-2/222/3000 DATE: 17 April, 1987
450 Hills/11/3000

PROCEDURE REFERENCE: BP 18.5, Revision 2

PURPOSE

To verify that procedure PMPM 10-102, Rev. 0 is adhered to in development of the Site Characterization Plan.

METHOD

Procedure review, documentation review and personnel interviews.

SCOPE

The surveillance plan consisted of three objectives and six questions. This report addresses the objectives by answering the questions. Surveillance was directed to Section 8.3.3 of the SCP.

RESULTS

Unsatisfactory. See Quality Assurance Finding (QAF) QSD-066-01.

SUMMARY

Surveillance indicated that paragraphs 5.1, 6.1, 6.3 and 6.5 of PMPM 10-102 Rev. 0 could not be substantiated by documented evidence maintained by the SCP Coordinator.

SURVEILLANCE TEAM MEMBERS

1. J. A. Bohn, DOE-RL (MAC) 376-7535
2. T. J. Marcella, DOE-RL (MAC) 376-9945

PERSONNEL CONTACTED AND INTERVIEWED

1. R. J. Landon, Manager, Site Characterization Plan Production Group, 6-0755
2. P. R. Clements, Senior Engineer (SCP Coordinator), 6-8496
3. L. Garvey, Senior Engineer
4. J. D. Davis, Staff Engineer, Seals Design and Development Group, 6-8397.
5. M. M. McCarthy, Staff Engineer, Seals Design and Development Group, 6-8397.

DOCUMENTS REVIEWED

1. PMPM 10-102, Rev. 0, "Site Characterization Plan Review"
2. Review Comment Record Forms (RCR) for SCP Section 8.3.3, Draft A
3. Summary of comment resolution meeting, dated November 4-6, 1986.
4. Various memorandums from DOE-OGR, related to Section 8.3.3.
5. SCP Section 8.3.3, Drafts A, B, C, and D.

INTERVIEWED PARTICIPANTS TO DETERMINE:

1. Are all technical comments received in writing and have there been any instances of technical comments transmitted via phone or in person (not documented)

PMPM 10-102, Rev. 0 requires all comments be recorded. Contrary to the requirement to record comments, SCP Section 8.3.3 was revised twice without justification being recorded (documented RCRs), as required. (See QAF QSD-066-01)

2. To what extent has the senior technical review team complied with the requirements of PMPM 10-102, Rev. 0?

Control Draft A was issued and reviewed. Comments were documented on RCRs. The RCRs have not been closed. However, Drafts B and C were issued, and no RCRs exist to document the justification for the changes. (Reference question No. 4.)

3. What direction, if any, has Rockwell (Senior Technical Review Team Leader, Lead Author, or Primary Author) received from DOE-HQ regarding the development of the SCP?

DOE-HQ has participated in the development of the SCP by attending workshops, comments sessions and etc. Contacts are in the form of telecons, personal visits and Rockwell visits to Washington, D.C.

4. Is there any evidence that comments to SCP have been incorporated without the necessary review and approval of Rockwell per PMPM 10-102, Rev. 0?

Yes. Control Draft A of Section 8.3.3 was issued and reviewed for comments, however, Drafts B and C were issued and no evidence of RCRs exist. Personnel responsible for Draft "D" stated that input for the revisions (Draft D) was given via memorandum from DOE-OGR and that the input was not documented on RCRs.

5. Do the records maintained by the Licensing Department's SCP Files Coordinator appear to be complete and in accordance with PMPM 10-103, Rev. 0?

Contrary to the requirements of PMPM 10-102, Rev. 0, para. 6.5, to utilize a change notice form for revisions to controlled drafts, there is no evidence of change notices being utilized for Revisions A, B, C and D to SCP Section 8.3.3.

6. Is the SCP Review and Comment process secure, through checks and balances, to assure that only technically correct and substantiated comments are incorporate in SCP Revisions?

Checks and balances for Section 8.3.3 of SCP are not as required per PMPM 10-103, Rev. 0. Documented evidence of RCR controls are non-existent (See QAF QSD-066-01).

QA66D7.TM1



QUALITY AUDIT FINDING

2. QAF Control No.
QSB-066-01

1. TO: Name Title
J. J. Graham Manager, Rockwell BWIP Licensing Dept.

3. Location
CDC-2/222/3000

4. Reference/Requirements
Rockwell Procedure PMPM 10-102, Rev. 0, "Site Characterization Plan Review," Requirements 5.1, 6.1, and 6.5.

5. Audit Or Surveillance Report No.
QSD-066

6. Potential Reportability under 10 CFR 60.73
 Yes No

7. Description
During the review and comment process fo BWIP SCP Section 8.3.3 (Seal System Program), Rockwell has failed to follow the procedural requirements of PMPM10-102 as evidenced by the following:

1. There is no evidence of Review Comment Record forms being used to document reviewers' comments and RHO's disposition of the comments for Drafts B and C as required by 5.1. Draft D is currently out for review.
2. There is no evidence of transmittal of Drafts B and C for comment to the Senior Technical Review Team, Team Leader and Lead Author, as required by 6.1.
3. There is no evidence that a Change Notice Form was issued for controlled Drafts A-D as required by 6.5.

8. Lead Auditor (Signature)
J. J. Manella

9. Issue Date
May 15, 1987

10. Response Due Date
June 15, 1987

11. Auditee Corrective Action Commitment (See Reverse for Instructions)
ATTACHED SHEET MCBHM 5/18/87

NOTE: Action Shall Address Root Cause, Impact on Previous Work and Measures to Prevent Recurrence

12. Responsible Action Manager (Signature)

13. Date

14. Action Completion Due Date

ACTION VERIFIED

15. Lead Auditor (Signature)

16. Date

18. Final Distribution
ORIGINAL-Audit/Surveillance Report File
1--Addressee
2--
3--

17. Final Review and Approval (QAF Closed)

DIRECTOR - Quality Systems Division

Date

INSTRUCTIONS FOR RESPONSE
QAF QSD-066-01

1. Evaluation of Impact on Ongoing and Previous Work

RHO must make an in-depth evaluation to determine what effect the reported condition had, or could have had, on affected project work performed while the condition existed. That evaluation must be documented and made a part of the response.

2. Action Taken or Planned as a Result of Impact Evaluation

If the impact evaluation places the validity or credibility of any prior work in question, RHO management is expected (a) to determine promptly what has to be done to salvage affected work, if feasible, (b) to identify what activities are doing work based on the now-tainted results, and (c) to immunize ongoing and future project work from the effects of such tainted results. If that course of action is necessary, it must be defined and reported in RHO's response.

3. Identification of Root Causes of Reported Adverse Conditions

RHO is expected to determine how and why the reported condition occurred. More specifically, what underlying condition, or set of circumstances, within the organization and/or its interfaces caused or enabled the reported condition to occur? The root cause, or combination of causes, must be reported as part of RHO's response.

4. Proposed Plan of Preventive Action

RHO is expected to define and implement a plan of action to ensure that the reported adverse condition will not recur. That plan of action must be described in RHO's response.

5. Preventive Action Schedule

RHO's preventive action plan is expected to include completion dates for the actions described. Completion means action completed and implemented.

[QA34E7.JB1]

To: *Jim Kennedy / Jim Donnelly*
Westinghouse
Hanford Company

MS 62355 HLOB

Internal
Memo

From: BWIP Quality Assurance Department 12100-87-000-177
Phone: 6-8358 1135 Jadwin/18/1100 Area
Date: July 8, 1987
Subject: AUDIT REPORT NO. BWIP-IA-87-004, SITE CHARACTERIZATION PLAN,
PRODUCTION

To: DE Mahagin

cc: DD Dorsey CDC-2/3000 KM Tominey FMIT Tr/300
DC Gibbs CDC-2/3000 RJ Viens CDC-2/3000
J Graham CDC-2/3000 Audit File BWIP-IA-87-004
GW Jackson CDC-1/3000 RTJ:DDO File/LB
JR Kirkendall CDC-2/3000 BRMC 3503/008 (2)

The attached report presents the results of the Rockwell Hanford Operations Basalt Waste Isolation Project (BWIP) audit of the Site Characterization Plan, Production conducted May 26, 1987 through June 17, 1987.

The scope, purpose, executive summary, and personnel contacted during the audit are detailed in the attached Audit Report. The Audit Report also includes the Audit Finding Reports, Audit Observation Reports, and Attendance Sheets for the Pre-Audit and Post-Audit Conferences.

Please provide corrective action responses on the original Audit Finding Response Reports and Audit Observation Reports presented at the Post-Audit conference. Responses must be submitted to the BWIP Quality Assurance (QA) Audit Group Manager by the agreed to date.

Should you have any questions, please contact DD Dorsey, Lead Auditor, Westinghouse Hanford Company BWIP QA Audit Group on 376-1987.

RT Johnson
RT Johnson, Manager
Basalt Waste Isolation Project
Quality Assurance Department

tak

Attachment

RECEIVED
JUL 1 8 1987
RTJ:DDO
(Not logged in)

Rockwell Hanford Operations Basalt Waste Isolation Project	AUDIT REPORT
ACTIVITY AUDITED Rockwell/BWIP Licensing Department 345 Hills St./3000 Area	REPORT NO. <u>BWIP-IA-87-004</u> DATE OF AUDIT <u>5/26/87 - 6/17/87</u> PROJECT <u>BWIP</u>
AUDIT TEAM (Name and Title) <u>D. D. Dorsey, Lead Auditor</u> <u>H. Litz, Auditor/DOE-RL</u>	<u>R. O. Mahood, Auditor-in-Training</u>

SUMMARY

SCOPE:

To verify implementation of responsibilities and requirements relative to control of Site Characterization Plan (SCP) production as set forth in Licensing Department Procedures (PMPM's) 1-108, 10-102, 10-103, 8-111, and 8-112.

PURPOSE:

The purpose of the audit was to evaluate the implementation of procedures (PMPM's) as they apply to the production of the SCP. Both Licensing and its interfaces with personnel from various other departments were examined.

EXECUTIVE SUMMARY:

This report presents the results of the Rockwell Hanford Operations (Rockwell) Basalt Waste Isolation Project (BWIP) audit of the SCP production conducted May 29, 1987 through June 17, 1987.

Thirteen findings and two observations were recorded. These reports document procedural noncompliance and/or poor business practices. Responses must be submitted to the BWIP Quality Assurance (QA) Audit Group Manager by the agreed date.

The implementation of the above referenced procedural requirements was determined to be ineffective. Those areas which are significantly impaired by improper procedural control are:

1. The capture and retention of records which would provide the historical basis for the validity of the rigorous review process by which the end product (SCP) was formulated (Ref. Findings 1, 3, 4, 6, 7, 9, 10, 12, and Observation A).
2. Training (Ref. Findings 2 and 11).
3. Interfaces between Licensing Department personnel and persons outside the department; (Ref. Findings 5, 8, 13 and Observation B).

R. J. Viens 7/1/87
R. J. Viens, Manager BWIP QA Audit Group

D. D. Dorsey
Audit Team Leader D. D. DORSEY

6-26-87
Date

No evaluation of the technical content of the SCP was made and no inference should be drawn between the lack of procedural compliance and the technical quality of the SCP.

The following is a summary of the findings and observations:

Finding No. 1

The SCP Review Comment Record (RCR) described in Revision 0 to procedure PMPM 10-102 has never been used. The SCP RCR, or similar, shown in Revision 1, effective June 5, 1987 has been used exclusively as far back as July of 1986. Entries on these forms are in many cases illegible, hand written, in pencil, in various shades of ink other than the allowable black, and the forms used have been reproduced on pink, blue, green, and goldenrod paper and in various combinations of all of the above. All of these are in violation of procedures and/or good business practices.

Finding No. 2

PMPM 13-106, Revision 1 requires that a determination of an individuals knowledge, skills and abilities be measured against "established requirements" in order to be considered qualified. While a BWIP Review Qualification form has been filled out on all members of the Senior Technical Review Team (STRT) and about 25% of the Lead Authors, no requirements have been established with which to measure a persons knowledge, skills, and abilities.

Finding No. 3

There is no evidence that the Licensing Department has established a system of checks and balances which will "maintain and control" the SCP Guidance Manual in a manner which assures that users have, and are using, the latest revision.

Finding No. 4

The record hard copy of the Administrative Record is not being maintained as an "In Process Quality Assurance Record" (Ref. PMPM 8-115, Revision 2) as required in PMPM 10-103 Revision 0.

Finding No. 5

SCP RCR's and copyright permission forms are being transmitted to the U. S. Department of Energy - Head Quarters (DOE-HQ) and the U. S. Department of Energy - Richland Operations Office (DOE-RL) by The Licensing Department personnel in violation of the requirements of RHO-GM-MA-2, 14-06.1 which requires all outgoing correspondence to be signed by the Project Director. The sole exception granted to

this policy is correspondence to major project participants which is signed by a Contracting Officers Technical Representative (COTR) to whom DOE has granted approval authority.

Finding No. 6

The Text Control Coordinator (TCC) is required to review all drafts of the SCP against a checklist called the SCP Text Acceptance Criteria. No mechanisms have been devised to document this required review.

Finding No. 7

The TCC is required to send a copy of each controlled draft, as they are returned from Technical Publications, to the Lead Author for a final accuracy check prior to submitting the draft to the reviewers. Due to time constraints, the TCC is sending the drafts to the reviewers at the same time as the copy is sent to the Lead Author.

Finding No. 8

PMPM 8-111, Revision 0 makes reference to an organization called "Data Management" and directs the Licensing Department personnel to forward documents to this organization. There is no such organization in BWIP as "Data Management."

Finding No. 9

PMPM 10-103, Revision 0 directs the SCP Files Coordinator to complete a "CTP Transmittal" per PMPM 8-113, Revision 1 to transmit documents to BRMC for microfilming. This procedure and CTP's are only to be used to transmit raw data and not documents.

Finding No. 10

PMPM 1-108 Revision 1 discusses "small group review" and resolving comments received from these reviews. PMPM 10-102, Revision 1 requires that all comments be recorded on RCR's, or other appropriate means, that documents concurrence with comment dispositions. While it could be argued that a marked up draft is an "other appropriate means" it does not provide for tracking resolution of comments as required.

Finding No. 11

Valid records reviewed at the training records area list only 30.3% of the 79 people, involved in SCP production, as having read PMPM 8-111; Revision 0. PMPM 1-108, Revision 1 states that this procedure (8-111) is applicable to the preparation of all parts of the SCP.

Finding No. 12

Revisions to the SCP File Index are not being approved by the Licensing Department Manager as required in PMPM 10-103, Revision 0.

Finding No. 13

An internal letter addressed to personnel in the Licensing Department requested SCP related documentation to be forwarded to the SCP Files Coordinator without identifying what this consisted of. No written direction has been given anyone outside of Licensing what to collect or to whom to send it.

Observation A

There is no approval log to show who has approval/acknowledgement authority for DOE-HQ; DOE-RL, Rockwell, and other entities for the various forms used in formulation of the SCP. Many signatures/initials are illegible and do not conform to BWIP requirements for legible records.

Observation B

There is no mechanism to assure that authors incorporate contentious comments with which they strongly disagree even though those comments have been elevated through the accepted approval cycle.

PERSONNEL CONTACTED:

H. Babad	Principal Scientist, Systems Engineering Department
S. K. Baker	Engineering Aide, SCP Production Group
P. R. Clements	Sr. Engineer, SCP Production Group
D. L. Duncan	Staff Engineer, SCP Production Group
S. J. Eckert	Administration Specialist, Project Qualification and Training
G. C. Evans	Staff Engineer, Systems Engineering Department
J. I. Feaster	Procedure Analyst, Document Control Unit
E. L. Fisk	Staff Engineer, Repository Design and Development Group
L. J. Garvey	Sr. Engineer, SCP Production Group
D. I. Herborn	Principal Engineer, Licensing Department

J. A. Hoogendoorn	Administrative Coordinator, Operations and Test
W. J. Hotarek	Manager, Records Management Unit
G. W. Jackson	Director, Science and Engineering
B. M. Johnson	Licensing Analyst, SCP Production Group
C. L. Koski	Licensing Analyst, SCP Production Group
R. J. Landon	Manager, SCP Production Group
L. K. Maday	Forms Designer, Technical Publications
R. K. Otte	Clerk, SCP Production Group
G. G. Penny	Sr. Engineer, QA Program Administration Unit
L. C. Preston	Editor, Technical Publications
W. Prosk	Staff Engineer, SCP Production Group
R. K. Ramsgate	Manager, QA Program Development Unit
C. S. Ransom	Administrative Coordinator, Science and Engineering
R. A. Singer	Principal Engineer, SCP Production Group
J. C. Sonnichsen	Manager, Systems Performance Assessment Group
M. J. Wagner	Clerk, SCP Production Group
C. R. Wilson	Engineering Aide, SCP Production Group

-The following attachments are an integral part of the Audit Report:

Attachment A	Pre-Audit and Post-Audit Attendance Sheets
Attachment B	Audit Finding Reports
Attachment C	Audit Observation Reports

ATTACHMENT A

PRE-AUDIT AND POST-AUDIT

ATTENDANCE SHEETS

PROJECT ATTENDANCE SHEET

- A. ATTENDED PRE-AUDIT CONFERENCE 5/20/81 11:00
 B. PERSONNEL CONTACTED DURING AUDIT
 C. ATTENDED POST-AUDIT CONFERENCE

NAME	*	ORGANIZATION	TITLE
1. J. P. Mahoney		ENR & A. Group	Engineering Director
2. John Bralaw		Licensing	Manager
3. J. J. Cionis/11/1/81		ENR & A. Group	Manager
4. Louis J. Crowley		RHO Licensing	Staff Eng.
5. Roger J. Landon		RHO Licensing	Manager, SEP Prod. Group
6. J. J. ...		ENR & A. Group	...
7. P. E. Lida		ENR & A. Group	...
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(See reverse side for design team instructions) * Indicate A, B, or C as applicable

DATE

TIME

- A. ATTENDED PRE-AUDIT CONFERENCE
- B. PERSONNEL CONTACTED DURING AUDIT
- C. ATTENDED POST-AUDIT CONFERENCE 6-17-87

	NAME	ORGANIZATION	TITLE
1.	HAROLD B. LITZ ^{RPD}	DOE/RL	QSD/OE.
2.	^{Richard C. Blumel} Richard C. Blumel	BWIP GA	"ENGINEER"
3.	R. A. SINGER	RHO-BWIP	ENGINEER
4.	W. Probst	RHO-BWIP	ENGINEER
5.	P. R. Clements	RHO-BWIP	ENGINEER
6.	D. D. DUNSEY	BWIP CIA	LEAD AUDITOR
7.	R J Landon	BWIP/Licensing	Man SCP Production
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ATTACHMENT 8

AUDIT FINDING REPORTS

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

Page 1 of 2

Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 01
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-GM-MA-2 Standard Requirements and Procedures 15-01 Forms Administration Rev. 0 Part 4.4 Using Department "Using department is responsible for: coordinating new or revised forms with all impacted departments and obtaining approval for use..."

RHO-BW-MA-17 PMPM 8-103 Rev. 0 Part 3.8 Quality Assurance Records "...Any records that meet one or more of the following criteria shall be maintained as lifetime records... Records used in support of site selection, site nomination, site characterization..."

RHO-BW-MA-17 PMPM 8-105 Rev. 1 Part 6.1 Recording Data "1. Record data in black ink (pencil is not acceptable) on clear (i.e. mylar) or white paper whenever possible... 2. Recorded data shall be legible when reproduced with any media to the fourth generation."

FINDING:

Official records in the Review Comment Record file include unapproved forms, blue ink, red ink, hand written comments, pencil entries, pink, blue, green, and goldenrod paper and illegible handwriting. More than 90% are unacceptable as Quality Assurance Records by one or more of the above criteria.

Response Commitment Date: 7-31-87

Acknowledged By: John Brumley

Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

AUDIT FINDING REPORT
AUDIT NO. BWIP-IA-87-004
FINDING NO. 01
PAGE 2 OF 2

"o Hand written, hand printed, typed and mechanically/electronically recorded data must be of sufficient penmanship quality and color intensity to be easily read."

RHO-BW-MA-17 PMPM 10-102 Rev. 1 Part 6.2 Senior Technical Review "...The individual STRT Reviewers transmit typed technical comments to the STRT Leader..."

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

Page 1 of 2

Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 02
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-QA-MA-3 Chapter 2.0 Rev. 3 Part 3.14 "...Records of the evaluation of a candidates education, experience and training compared to the documented requirements for the position shall be maintained."

RHO-BW-MA-17 PMPM 13-106 Rev. 1 Part 3.11 Qualification of Personnel "Determination that the knowledge, skills and abilities gained through training and experience, as measured against established requirements, qualify an individual to perform a required job or task in a safe and proficient manner."

RHO-BW-MA-17 PMPM 10-102, Rev. 1 Part 5.2 Reviewer Qualifications "The qualifications of the STRT Leader and all Review Team Personnel shall be documented on a BWIP Review Qualification Form..."

FINDING:

There is no documented evidence that the Review Team Leader, Review Team Personnel or Lead Authors were "qualified", as measured against established, documented, requirements, as required.

Response Commitment Date: 7-31-87 Acknowledged By: John Graham Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

AUDIT FINDING REPORT
AUDIT NO. BWIP-IA-87-004
FINDING NO. 02
PAGE 2 OF 2

RHO-BW-MA-17 PMPM 1-108, Rev. 1 Part 6.2.1 Initial Text Preparation "...A technically qualified Lead Author will be assigned for each chapter of the SCP..."

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

Page 1 of 1

Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 03
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 8-111 Rev. 0 Para. 3.2 SCP Guidance Manual "The SCP Guidance Manual is a collection of pertinent Rockwell, DOE, Nuclear Regulatory Commission (NRC) and regulatory guidance documents that is maintained and controlled by the Licensing Department.

FINDING:

There is no documented evidence that a Document Control System is in place in the Licensing Department to maintain and control the SCP Guidance Manual in a manner which assures that users have the current revision.

Response Commitment Date: 7-31-87 Acknowledged By: John Braker Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

Page 1 of 1

Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 04
Stop Work Order Issued yes no X Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 10-103 Rev. 0 Part 5.2 Site Characterization Plan Record Hard Copy File "A hard copy of the Administrative Record will be maintained at BWIP by the SCP Files Coordinator and copies will be forwarded to the U.S. Department of Energy-Richland Operations Office on request. The SCP record hard copy file will be maintained and protected as in-process records in accordance with PMPM 8-115."

FINDING:

The record hard copy of the Administrative Record is not being maintained per the requirements of PMPM 8-115.

Response Commitment Date: 7-31-87 Acknowledged By: John Galan Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

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Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 05
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 8-101 Rev. 1 Part 3.2 Outgoing External Correspondence "Refers to all written communications directed to organizations, government agencies or individuals outside the Integrating Contractors (IC) organizations."

RHO-BW-MA-17 PMPM 8-101 Rev. 1 Part 4.3 Outgoing Correspondence "All outgoing correspondence will be signed per RHO-GM-MA-2 Procedure 14-06.1. Deviation from this policy is not authorized, with the exception of those individuals who have been given signature authority by the U.S. Department of Energy - Richland Operations Office (DOE-RL)."

FINDING:

Comments from reviewers (RCR's) and copyright permission forms are regularly transmitted to DOE-RL and HQ in an informal manner by Licensing Personnel.

Response Commitment Date: 7-31-87 Acknowledged By: *John Sale* Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

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Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 06
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 8-111 Rev. 0 Part 6.1 Original Text Development "...The TCC reviews the draft against the SCP Text Acceptance Criteria."

FINDING:

There is no documented evidence that this review is being completed.

Response Commitment Date: 7-31-87 Acknowledged By: John Graham Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

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Responsible Organization Licensing Department Audit No. 8WIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 07
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 8-111 Rev. 0 Part 6.3 Text Verification "The TCC forwards a copy of the Controlled Draft to the Lead Author for a final accuracy check."

FINDING:

The TCC forwards the draft at the same time as general distribution not in a separate prior, step as required.

NOTE: Also see 6.3.1, 6.3.2, and 6.4.

Response Commitment Date: 7-31-87 Acknowledged By: John Borsten Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

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Responsible Organization _____ Licensing Department _____ Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 08
Stop Work Order Issued yes _____ no X Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 8-111 Rev. 0 Part 6.5.2 Reference Provided and Part 6.6 Reference Duplication

6.5.2 Reference Provided "If two copies of the reference are provided, the Reference Coordinator forwards one copy to Data Management, and places one copy in the Licensing Department SCP Reference File."

6.6 Reference Duplication "Data Management coordinates microfilming and duplication of the reference, and stores the completed reference sets (hard copy and microfiche) until required for distribution."

FINDING:

Reference is made to an organization called "Data Management", no such organization exists at the Basalt Waste Isolation Project (BWIP).

Response Commitment Date: 7-31-87 Acknowledged By: *John S. ...* Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate _____ Inadequate _____
(COMMENTS)

Evaluated By: _____ Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

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Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 09
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 10-103 Rev. 0 Part 6.3.1 Document Transmittal "The SCP Files Coordinator completes a CTP transmittal and attaches it to a copy of each group of applicable documents, as required, in accordance with PMPM 8-113. The documents are then transmitted to BRMC for microfilming per PMPM 8-103."

FINDING:

Documents are not being submitted per this procedure.

Response Commitment Date: 7-31-87 Acknowledged By: John Graham Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By:

Date:

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

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BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

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Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 10
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 1-108 Rev.. 1 Part 6.2.1 Initial Text Preparation "...each chapter/section will be subjected to a small group review by DOE-RL, DOE-HQ and PNL representatives. Comments from these reviews will be addressed by the lead author and other contributing authors..."

RHO-BW-MA-17 PMPM 10-102 Rev. 1 Part 5.1 Review Comments "All comments shall be recorded on SCP Review Comment Sheets (or other appropriate means) that documents concurrence with comment dispositions. The name, organization, and department of the reviewer(s) should be included on the form."

FINDING:

Comments from the small group review were not documented on SCP Review Comment Sheets, as required.

Response Commitment Date: 7-31-87 Acknowledged By: Jim Golan Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

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Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 11
Stop Work Order Issued yes no Date 5/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 1-108 Rev. 1 Part 6.2.1 Initial Text Preparation "The preparation of initial SCP text will be accomplished in accordance with PMPM 8-111. Which establishes the responsibilities of all participants as they relate to SCP text development including original writing, word processing, editing, and control of the SCP text. In addition, this procedure identifies the interfaces between BWIP authors, Licensing Department staff, and Technical Publications staff. The requirements of this procedure are applicable to the preparation of all parts of the SCP."

FINDING:

Only 30.3% of the 79 persons listed as involved in the preparation of the SCP have valid evidence of having read PMPM 8-111. The PMPM 8-111 is not included on the required reading lists of a majority of those persons employed in departments other than licensing.

Response Commitment Date: 7-31-87 Acknowledged By: John Enslaw Date: 6-17-87

FOLLOW-UP VERIFICATION Adequate Inadequate
(COMMENTS)

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

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Responsible Organization Licensing Department Audit No. 8WIP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 012
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 10-103 Rev. 0 Part 5.1 Site Characterization Plan File Index "...Revisions to the SCP File Index will be proposed to the SCP Files Coordinator by a Rockwell employee that is involved with preparation of the SCP. All revisions must be approved by the Licensing Department Manager prior to implementation..."

FINDING:

Revisions to the SCP File Index are not being approved by the Licensing Department Manager as required.

Response Commitment Date: 7-31-87

Acknowledged By: John Brown

Date: 6-17-87

FOLLOW-UP VERIFICATION
(COMMENTS)

Adequate Inadequate

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT FINDING REPORT

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Responsible Organization Licensing Department Audit No. 8WiP-IA-87-004
Location 345 Hills St./3000 Area Finding No. 013
Stop Work Order Issued yes no Date 6/17/87
Stop Work Order No. N/A Auditor D. D. Dorsey

REQUIREMENT(S)/REVISION

RHO-BW-MA-17 PMPM 10-103 Rev. 0 Part 6.1.1 Document Identification "...The Licensing Department Manager identifies existing SCP related documentation and correspondence and requests the SCP Files Coordinator to obtain copies.

RHO-BW-MA-17 PMPM 10-103 Rev. 0 Part 6.1.2 Document Acquisition "...The Licensing Department Manager directs all group managers to forward copies of SCP related documentation and correspondence to the SCP Files Coordinator. All other department managers involved in the preparation, revision and publication of the SCP, direct that group managers forward copies of SCP related documentation and correspondence to the SCP Files Coordinator..."

FINDING:

There is no documentary evidence that "SCP related documentation" has been adequately identified to allow the SCP Files Coordinator to obtain copies, or that department and group managers, outside the Licensing Department have been directed to forward copies to the SCP Files Coordinator.

Response Commitment Date: 7-31-87

Acknowledged By: *John Salain*

Date: 6-17-87

FOLLOW-UP VERIFICATION
(COMMENTS)

Adequate Inadequate

Evaluated By: _____

Date: _____

Finding Closed By _____ Date _____

(Refer to audit response for basis of closure)

ATTACHMENT C

AUDIT OBSERVATION REPORTS

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT OBSERVATION REPORT

Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Observation No. A
Date 6/17/87
Response Rev. No. _____

OBSERVATION:

Many Review Comment Records and other documents were reviewed in the course of the audit. These require various approvals and acknowledgements which primarily consist of initials or signatures. There is no approved signature log to show who has authority, from the various entities, to sign approval or an example of that persons signature/initials to verify the correctness of the approval. Also many of the signatures/initials are illegible or unintelligible and need to be made to conform to BWIP requirements for legible records.

Response Required yes X no _____ Auditor: D. D. Dorsey Date: 6/17/87
Commitment Date For Response: 7-31-87 Acknowledged By: [Signature] Date: 6-17-87
OBSERVATION RESPONSE:

Commitment Date For Completion: _____ Prepared By: _____ Date: _____
RESPONSE EVALUATION: Adequate _____ Inadequate _____

Comments:

Evaluated By: _____ Date: _____ Lead Auditor: _____ Date: _____

FOLLOW-UP VERIFICATION: Adequate _____ Inadequate _____

Comments:

Evaluated By: _____ Date: _____

Observation Closed By: _____ Date: _____

ROCKWELL HANFORD OPERATIONS
BASALT WASTE ISOLATION PROJECT
AUDIT OBSERVATION REPORT

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Responsible Organization Licensing Department Audit No. BWIP-IA-87-004
Location 345 Hills St./3000 Area Observation No. B
Date 6/17/87
Response Rev. No. _____

OBSERVATION:

Several "contentious" comments have been identified in the reviews conducted to date. While these comments have been handled in the manner prescribed by the procedures, many of them show on the logbooks as open from as long ago as August of 1986. This is due in some part to authors being strongly resistant to incorporating statements that they disagree with even though a committee of their peers voted to accept the comment. There needs to be a mechanism in place to follow up these contentious comments to assure their "timely" incorporation.

Response Required yes X no _____ Auditor: D. D. Dorsey Date: 6/17/87

Commitment Date For Response: 7-31-87 Acknowledged By: John Graham Date: 6-17-87

OBSERVATION RESPONSE:

Commitment Date For Completion: _____ Prepared By: _____ Date: _____

RESPONSE EVALUATION: Adequate _____ Inadequate _____

Comments:

Evaluated By: _____ Date: _____ Lead Auditor: _____ Date: _____

FOLLOW-UP VERIFICATION: Adequate _____ Inadequate _____

Comments:

Evaluated By: _____ Date: _____

Observation Closed By: _____ Date: _____