

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

CORRECTIVE ACTION REQUEST

CAR No. 90-04

Associated AR,SR,NCR NO. CNWRA 90-01

PART 1: DESCRIPTION OF CONDITION ADVERSE TO QUALITY

Contrary to the requirements stated in Section 18, Audits, para. 18.3, each section of the CQAM was not audited during calendar year 1989.

Initiated by: Michael R. Gonzalez

Date: July 30, 1990

PART 2: PROPOSED ACTION

Responsible Element Manager: Henry F. Garcia

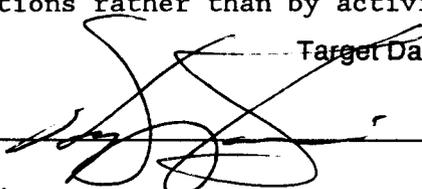
a) Root Cause:

The root cause of this deficiency was the lack of sufficient explanation in audit reports and the failure to revise audit schedules with the requirement to audit all sections of the manual in mind. Audit reports should have explained why certain sections were not included within the audit scope due to their nonapplicability or lack of auditable activities. The audit schedule should have been revised to reflect the changing scope of the audits. Schedules could have explained why various CQAM Sections were excluded.

b) Corrective Action to Preclude Recurrence:

An analysis of the Sections of the CQAM excluded from the scope of 1989 audits was made, with the conclusion that this had no impact on the sufficiency of the internal audit program as a whole. The analysis is attached. For 1990, audits are scheduled around CQAM Sections rather than by activities, so no potential for recurrence exists.

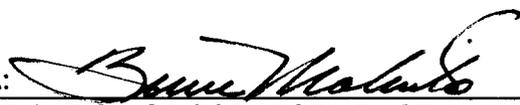
Target Date for Completion: Not applicable

Response provided by: 

Date: 8/17/90

PART 3: APPROVAL

Comments/Instructions:

Director of QA: 

Date: 8/27/90

PART 4: VERIFICATION OF CORRECTIVE ACTION IMPLEMENTATION

The attached Justification memo (7/10/90) is sufficient corrective action.

Verified by: 

Date: 9/4/90

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

To: Bruce Mabrito

July 10, 1990

From: R. D. Brient *WDB*

Subject: Review of 1989 Internal Audit Scope

A review was conducted to determine those CQAM Sections that were not included within the scope of internal audits in 1989, and any adverse impacts that could result. The findings are as follows:

- 1) Audit 89-C-1 covered CQAM Sections i, 1, 2, 3, 5, 6, 15, 16, 17, 18, and 19.
- 2) The introduction to Audit 89-C-2 indicated that the balance of the CQAM was covered in that audit, however, checklist items did not cover Sections 4, 9, 10, or 14.

Revision 1 of the CQAM was then reviewed to determine the impact of these omissions, with the following results:

- 1) Section 4 has no contents, as all procurement requirements were consolidated into Section 7.
- 2) Section 9 deals with special processes, which in the traditional sense (welding, NDE, etc.) will not and had not in 1989 been conducted by the Center. Note that Revision 2 of the CQAM addresses Criterion 9 primarily in terms of qualification of novel scientific investigation methods.
- 3) Section 10 covers Inspection as applicable to fabrication, none which will be performed by the Center. Revision 2 of the CQAM takes exception to Criterion 10.
- 4) Revision 1 of the CQAM took exception to Criterion 14, "Inspection, Test, and Operating Status."

In conclusion, the omission of those Sections of the CQAM from the scope of internal audits was justified and had no impact on the validity of Center activities. The audit record could have been clearer in substantiating the reasons for these omissions and the audit finding could have been avoided.