# DOE/SRPO QUALITY ASSURANCE AUDIT REPORT

of

PARSONS-REDPATH

3040 Riverside Drive, Suite 224

Columbus, Ohio 43221

Audit Dates:

November 15 and 16, 1984

### 1.0 Purpose of Audit

The purpose of the audit was to evaluate the effectiveness of the Parsons-Redpath (P-R) QA Program as well as evaluate the degree of implementation of the QA Program in conformance with the P-R QA Manual.

It should be noted that P-R QA Manual has not been accepted by DOE/SRPO to date; therefore, revision 1 of the P-R QA Manual dated February 10, 1984, and the proposed draft revision 2 of the QA Manual dated November 1984, were reviewed during the course of the audit.

Also, the audit team evaluated conformance with selected procedures in the Project Procedure Manual dated July 10, 1984.

### 2.0 Personnel Contacted

R.E. Rihs 1,2,3 - QA Manager A.M. Shoemaker 1.3 - Project Controls Manager 1,2,3 - Contract/Administration Manager J.E. Powell 1,2 C.A. Lyons - Procurement Manager 1,2,3 - Chief Engineer J.W. Burgess 1,2 G.A. Stafford - Project Director 1 J. Steinmetz - Project Controls F.C. Hood 3 - Dupty Project Director

### 3.0 Summary of Audit Results

The audit team noted that the P-R QA Manual is being prepared for submittal to DOE/SRPO in the very near future. The audit team also noted that several procedures and manuals (i.e., QC Manual, Construction Manual) are not under preparation per the schedule denoted in the corrective action response to Observations 1 and 2 of the 1983 SRPO QA Audit. P-R personnel explained that these dates have changed due to the schedule and construction methodology changes, as well as lack of availability of a design.

The team did observe that appropriate procedures and practices are in effect for design-control activities of P-R. Conceptual designs submitted by the Exploratory Shaft Facility Architect-Engineer to the Exploratory Shaft Facility Construction Manager for constructability reviews were documented and reviewed in accordance with the QAP-3 requirements. A good effort by P-R personnel on design control activities was noted by the audit team.

<sup>1 =</sup> Attended preaudit conference

<sup>2 =</sup> Contacted during audit

<sup>3 =</sup> Attended postaudit conference

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As a result of the audit, five (5) findings were identified and documented on Audit Action Reports (AARs) one (1) through five (5), and three (3) observations were identified.

The AARs were documented in the following areas:

- AAR 1 The area of training was not effectively implemented per the requirements of the P-R QA Manual.
- AAR 2 Several discrepancies in the document control system were noted that requires attention by appropriate P-R personnel.
- AAR 3 The proposed QA record designation, control, and storage system does not fully meet ANSI/ASME NQA-1 1983 requirements.
- AAR 4 The audit system has several areas of nonconformance with P-R procedures and NQA-1 requirements.
- AAR 5 Proposed corrective action with regard to procedure generation as stated in observation one (1) and two (2) of the 1983 DOE/SRPO audit of P-R has not been effectively implemented.

The audit team suggests that P-R personnel examine the above areas for administrative system improvement in order to correct the above deficiencies. One method would be to conduct more comprehensive audits to gauge weak areas, and assess the overall system effectiveness.

The DOE audit conducted in November, 1983 is considered to be closed and corrective actions verified. Areas not fully implemented are carried over as new findings in this audit.

### **Observations**

- 1. The audit team suggests that P-R consider deleting reference to the QA level classification system as referenced in QAP-1, paragraph 2.2, since DOE has not given any specific direction regarding safety classification or quality classification of systems. Additionally, the type of equipment and systems classified according to the various levels may change due to revisions to designs, etc. This type of information might be better served in an instruction outside of the QA Manual.
- 2. It is recommended that all personnel and prospective personnel certified as lead auditors should take some auditor training course as provided for by NQA-1 Supplement 2S-3, paragraph 3.2. The documentation of this training would enhance the certifiability of the individual as well as

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provide for uniformity of QA program implementation of DOE Contractors. Also, the team suggests that any audit checklists utilized during audits be kept in a file for future reference.

3. The procurement document control and subcontractor control system should be upgraded to insure a more visible confirmation of document review by the QA Manager to assure adequacy of QA requirement inclusion or exclusion. The present system includes coordination with the QA Manager, but this coordination is difficult to find with the records.

#### Definitions:

Finding - A statement of fact regarding noncompliance with established policy, procedures, instructions, drawing, or other applicable documents. A finding should be worded to identify a generic issue, rather than individual noncompliances, deviations, or deficiencies.

<u>Observation</u> - An opinion regarding an unsatisfactory condition not covered by a specific requirement, or a procedure, practice, or instruction whose effectiveness could be improved.

### 4.0 Effectiveness

The team has concluded that the QA program is in an early stage of establishment and implementation, and thus may not have been adequately incorporated into the daily activities of the staff. Therefore, due to the lack of prompt corrective action per the identified response to the November 1983, DOE/SRPO audit and the conditions noted during this audit, the QA program has not been fully implemented.

| *            | <i>ħ</i>                       | *          | *      | *    | *         |
|--------------|--------------------------------|------------|--------|------|-----------|
| Issued by:   | 3 Mifres                       |            |        | Date | 11/29/54  |
| Reviewed by: | 1.J./Lefnan -<br>R.S. Waters - | Audit Team | Leader | Date | 12/10/84  |
| Approved:    | T.J. Reese, SR                 | Decre      | •      | Date | 12/10/84- |

| 1  | To: G. Stafford/Project Director   | 2 From: I.J. Lefman 11/16/84<br>(Audit Team Leader)   |
|----|--|---|
| 3  | Company: Parsons-Redpath   |   |
| 4  | AUDIT NO. 84-E-12  | 5 AAR NO. 1   |
| 6  | X FINDING DBSERVATION  | 7 ISSUE DATE: 11/16/84  |
| 8  |  | ively implemented per the requirements  |
| 9  | <ol> <li>The training program is not comprehenced or read. Additionally, SRPO audit of 11/83 - Observation and the project QA Manual will be be completed by 5/15/84.</li> <li>The documentation of training was QAP-2 in that the trainee title and the project of the second completed.</li> </ol> | Indoctrination in the 5/84 or 9/84 B. Loran has not been trained to date. rehensive in that specific d the project procedures have not been the corrective action response to a 5 stated that requirements of NOA-1 persented in a training session to a sometime of the training attendance sheets noted for |
| 10 | REQUIREMENT/REFERENCE CRITERIA QAP-2, paragraph 6.1 states that the responsibility to assure that P-R or quality-related functions are adequa- scope and details of those activities   | r subcontractor personnel performing ately instructed about the purpose,  |
| 11 | REPORTED BY: I.J. Lefman 11/16/84  | 12 DISCUSSED WITH: F.C. Hood 11/16/84   |
| 13 | (Response due to SRPO QA by  | action to prevent recurrence):) date)   |
| 14 | Scheduled Completion Date:15 Signe   | ed: (Authorized Representative) (Date)  |

| 1  | To: G. Stafford/Project Director 2 From: I.J. Lefman 11/16/84 (Audit Team Leader)  |
|----|--|
| 3  | Company: Parsons-Redpath   |
| 4  | AUDIT NO. 84-E-12 5 AAR NO. 2  |
| 6  | X FINDING OBSERVATION 7 ISSUE DATE: 11/16/84   |
| 8  | DESCRIPTION OF CONDITION REQUIRING CORRECTIVE ACTION  The area of document control and procedure approval has not been effectively implemented.  |
| 9  | <ol> <li>DISCUSSION OF CONDITION REQUIRING CORRECTIVE ACTION         <ol> <li>No evidence of the QA Manager's review of procedures A-1, A-9, PS-3 was available.</li> <li>A distribution list for distributing the Project Procedures was not utilized for the 9/84 revision as required by QAP-5, paragraph 3.4.</li> <li>The acknowledgement receipt/transmittal form did not identify the procedures, revision number, date of table of contents, etc. as provided for in the form. Furthermore, no acknowledgement receipt was received to date for the Project Procedure Manual transmitted to J. Burgess.</li> </ol> </li> <li>Several QA manuals and PP manuals were not marked "superseded" or the previous issue destroyed as required by QAP-6. (J. Powell's QA Manual, Rev. O, J. Burgess' QA Manual, Rev. O, Project Procedure Manual 1983 and 5/84 revision, R. Rihs - individual project procedures)</li> <li>The Administrative Manager has not maintained an effective follow-up system for overdue transmittal acknowledgements.</li> </ol> |
| 10 | REQUIREMENT/REFERENCE CRITERIA QAP-5, paragraph 3.1 states that the QA Manager and the originating manager approves P-R quality-related procedures QAP-5, paragraph 3.4 defines distribution requirement.  |
| 11 | REPORTED BY: I.J. Lefman 11/16/84 12 DISCUSSED WITH: F.C. Hood 11/16/84  |
| 13 | PROPOSED CORRECTIVE ACTION (including action to prevent recurrence): (Response due to SRPO QA by   |
| 14 | Scheduled Completion Date: 15 Signed: (Authorized Representative) (Date)   |

| 1  | To: G. Stafford/Project Director 2 From: I.J. Lefman 11/16/84 (Audit Team Leader)   |
|----|---|
| 3  | Company: Parsons-Redpath  |
| 4  | AUDIT NO. 84-E-12 5 AAR NO. 3   |
| 6  | X FINDING OBSERVATION 7 ISSUE DATE: 11/16/84  |
| 8  | DESCRIPTION OF CONDITION REQUIRING CORRECTIVE ACTION The records system has not been established or maintained; the proposed system does not fully meet ANSI/ASME NQA-1 1983 requirements.  |
| 9  | <ol> <li>DISCUSSION OF CONDITION REQUIRING CORRECTIVE ACTION</li> <li>QAP-17 has been further defined by QA-01 (6/25/84) without coordination or approval of DOE.</li> <li>No QA documents have been considered as QA records, neither QAP-17 nor QA-01 have been implemented. QA manuals, letters, QA audit reports, procedures, etc., are QA records and should be handled as per QA-01.</li> <li>The QA Secure Records Facility clearly does not meet NQA-1 for a single storage facility, paragraph 17S-1, 4.4.1 or 4.4.2.</li> <li>The present file cabinet storage does not meet QA record storage requirements.</li> </ol> |
| 10 | REQUIREMENT/REFERENCE CRITERIA QAP-17, paragraph 2.1 states requirements for QA records control (superseded by QA-01). NQA-1 states requirements for QA records in Basic Requirements 1 and 17S-1.  |
| 11 | REPORTED BY: Jerry Reese 11/16/84 12 DISCUSSED WITH: F.C. Hood 11/16/84   |
| 13 | (Response due to SRPO QA by   |
| 14 | Scheduled Completion Date: 15 Signed: (Authorized Representative) (Date)  |

| 1  | To: G. Stafford/Project Director  | 2   | From: I.J. Lefman 11/16/84 (Audit Team Leader)  |
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| 3  | Company: Parsons-Redpath  |   |   |
| 4  | AUDIT NO. 84-E-12   | 5   | AAR NO. 4   |
| 6  | ▼ FINDING □ OBSERVATION   | 7   | ISSUE DATE: 11/16/84  |
| 8  | DESCRIPTION OF CONDITION REQUIRING CORI<br>In the area of audits several instance<br>follows:   |   |   |
| 9  | DISCUSSION OF CONDITION REQUIRING CORRI  1. R. Rihs has not been certified as a several internal audits (84-1, 84-2). Audit responses have not been verification surveillances (QAP-18, paragraph 2.3. Audits have not been properly close QAP-18, Supplement 1, paragraph 3.4. Audit responses are not documented are documented on the close out act and in other cases they are documented manager.  5. The method of documentation of evaluation of evaluation. | a Le<br>2, 8<br>fiec<br>.10)<br>ed c<br>5.<br>cor<br>tion | ead Auditor prior to conducting 84-4, 84-5). I in subsequent audits or but per the requirements of ensistently. In some cases they a portion of the finding sheet, if on a memorandum to the QA |
| 10 | REQUIREMENT/REFERENCE CRITERIA QAP-18, NQA-1 - Supplement 2S-3, 18S-  | ١.  |   |
| 11 | REPORTED BY: I.J. Lefman 11/16/84 13  | 2 D   | SCUSSED WITH: F.C. Hood 11/16/84  |
| 13 | PROPOSED CORRECTIVE ACTION (including (Response due to SRPO QA by (da   |   | ion to prevent recurrence):   |
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|    |   |   |   |
| 14 | Scheduled Completion Date:15 Signed   | :   | Authorized Representative) (Date)   |

| 1  | To: G. Stafford/Project Director 2 From: I.J. Lefman 11/16/84 (Audit Team Leader)   |
|----|---|
| 3  | Company: Parsons-Redpath  |
| 4  | AUDIT NO. 84-E-12 5 AAR NO. 5   |
| 6  | X FINDING OBSERVATION 7 ISSUE DATE: 11/16/84  |
| 8  | DESCRIPTION OF CONDITION REQUIRING CORRECTIVE ACTION Two P-R corrective actions in response to observations in the last SRPO QA audit of P-R were not implemented.  |
| 9  | <ol> <li>DISCUSSION OF CONDITION REQUIRING CORRECTIVE ACTION</li> <li>The Milestone Log dated 4/6/84 is no longer current. Therefore, procedures do not meet the forecast date. (re: Response from P-R on previous Audit Observation No. 1).</li> <li>Administrative procedure A-12, "Records Management Plan" was not issued on 7/27/84 as stated in Response from P-R on previous Audit Observation No. 2.</li> </ol> |
| 10 | REQUIREMENT/REFERENCE CRITERIA Response on Audit 83-E-17 (11/28-29/83) from P-R on 4/6/84 stated that observations Nos. 1 and 2 were complete.  |
| 11 | REPORTED BY: I.J. Lefman 11/16/84 12 DISCUSSED WITH: F.C. Hood 11/16/84   |
| 13 | PROPOSED CORRECTIVE ACTION (including action to prevent recurrence): (Response due to SRPO QA by  |
| 14 | Scheduled Completion Date: 15 Signed: (Authorized Representative) (Date)  |

#### ARGONNE PEER REVIEW REPORTS PUBLISHED TO DATE

Harrison, W., and others, Radioactive Waste Isolation in Salt: Peer Review of the Office of Nuclear Waste Isolation's Geochemical Program Plan, ANL/EES-TM-242, 26 p., (February 1984)

Winter, R., D. Fenster, and others, <u>Radioactive Waste Isolation in Salt: Peer Review of the Office of Nuclear Waste Isolation's Socioeconomic Program Plan, ANL/EES-TM-243, 47 p., (July 1984)</u>

Harrison, W., and others, Radioactive Waste Isolation In Salt: Peer Review of the Office of Nuclear Waste Isolation's Plans for Repository Performance Assessment, ANL/EES-TM-246, 117 p., (May 1984)

Fenster, D., and others, Radioactive Waste Isolation in Salt: Peer Review of the Office of Nuclear Waste Isolation's Reports on Preferred Repository Sites within the Palo Duro Basin, Texas, ANL/EES-TM-254, 41 p., (April 1984)

Ditmars, J., and others, Radioactive Waste Isolation in Salt: Special Advisory Report on the Status of the Office of Nuclear Waste Isolation's Plans for Repository Performance Assessment, ANL/EES-TM-256, 155 p., (October 1983)

Fenster, D., and others. Radioactive Waste Isolation in Salt: Peer Review of the Office of Nuclear Waste Isolation's Plan to Decommission and Reclaim Exploratory Shafts and Related Facilities, ANL/EES-TM-258, 28 p., (July 1984)

Fenster, D., and others, Radioactive Waste Isolation in Salt: Peer Review of the Office of Nuclear Waste Isolation's Report on the Organic Geochemistry of Deep Groundwaters from the Palo Duro Basin, Texas, ANL/EES-TM-259, 30 p., (August 1984)

Fenster, D., and others, Radioactive Waste Isolation in Salt: Peer Review of the Texas Bureau of Economic Geology's Report on the Petrographic, Stratigraphic, and Structural Evidence for Dissolution of Upper Permian Bedded Salt, Texas Panhandle, ANL/EES-TM-260, 40 p., (August 1984)

Hambley, D., and others, Radioactive Waste Isolation in Salt: Peer Review of the Office of Nuclear Waste Isolation's Report on Functional Design Criteria for a Repository for High-Level Radioactive Waste, ANL/EES-TM-261, 37 p., (August 1984)

Hambley, D., and others, Radioactive Waste Isolation in Salt: Peer Review of the D'Appolonia Report on Schematic Designs for Penetration Seals for a Repository in the Permian Basin, Texas, ANL/EES-TM-262, 37 p., (September 1984)

Mc Pheeters, C., and others, Radioactive Waste Isolation in Salt: Peer Review of the Office of Nuclear Waste Isolation's Report on Multifactor Life Testing of Waste Package Materials, ANL/EES-TM-263, 45 p., (September 1984)

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