



Department of Energy

Washington, DC 20585

QA: QA

FEB 06 2002

M. T. Peters
Los Alamos National Laboratory
1180 Town Center Drive, M/S 423
Las Vegas, NV 89144

ISSUANCE OF DEFICIENCY REPORT (DR) BSC-02-D-068 RESULTING FROM AN OBSERVATION BY MARK T. PETERS

Enclosed is DR BSC-02-D-068 generated as a result of an observation.

Please provide a response to this deficiency that meets the applicable requirements of Administrative Procedure (AP) 16.1Q, *Management of Conditions Adverse to Quality*. Send the original of your response to Deborah G. Opielowski, NQS, P.O. Box 364629, Mail Stop 455, North Las Vegas, Nevada 89036-8629. Initial response to the DR is due ten working days from the date of this letter. Any extensions to this due date must be requested in accordance with AP-16.1Q.

The Responsible Individual for this Condition Adverse to Quality (CAQ) should sign below and return to Ms. Opielowski within five working days.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Donald J. Harris at (702) 794-1467.

Ram Murthy, Acting Director
Office of Quality Assurance

OQA:JB-0624

Enclosure:
DR BSC-02-D-068



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Acknowledgement of Understanding of the CAQ (DR BSC-02-D-068) by the Responsible Individual:

Responsible Individual	Date
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cc w/encl:

N. K. Stablein, NRC, Rockville, MD
Robert Latta, NRC, Las Vegas, NV
S. W. Lynch, State of Nevada, Carson City, NV
Engelbrecht von Tiesenhausen, Clark County, Las Vegas, NV
M. T. Peters, BSC/LANL, Las Vegas, NV
R. W. Andrews, BSC, Las Vegas, NV
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K. A. Hodges, NQS, Las Vegas, NV
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B. M. Terrell, DOE/YMSCO, Las Vegas, NV

**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

8. ☒ DEFICIENCY REPORT
☐ CORRECTIVE ACTION REPORT
 NO. BSC-02-D-068
 PAGE 1 OF 2 060 1/28/02
 QA: KQA

DEFICIENCY/CORRECTIVE ACTION REPORT

D60 1/28/02

1. Controlling Document:
 AP-SIII.7Q Revision 0 ICN 0 SCIENTIFIC INVESTIGATION LABORATORY AND
 FIELD TESTING

2. Related Report No.:
 N/A

3. Responsible Organization:

BSC Science and Engineering Testing Project

4. Discussed With:

Robert Andrews, William Watson, Kenneth Gilkerson

5. Requirement

2.0 APPLICABILITY

This procedure applies to the Office of Civilian Radioactive Waste Management (OCRWM) and its Affected Organizations who conduct and document testing activities in support of the OCRWM Program at any designated location.

Scientific investigation testing initiated prior to the effective date of this procedure is exempted from the requirements of this procedure for a period of 120 days from the effective data of this procedure.

Section 5.3.1 BSC S&ET:

a) Evaluate pre-test predictions and test plans, approve the test plan by signature and date, and authorize the start of tests in accordance with checklist(s).

b) Ensure a copy of the authorized test plan is sent to the Records Processing Center.

c) Ensure the test plan is distributed in accordance with the requirements of AP-6.1Q, Controlled Distribution.

6. Description of Condition:

1. A list of tests that require test plans was issued by BSC S&ET. Some test plans covering testing that was initiated prior to the effective date of AP-SIII.7Q were not completed and testing authorized within the 120 day exemption period in Section 2.0. Test Plans have been drafted but have not yet completed the AP-2.14Q review cycle.

Refer to attached E-mail dated 01/31/02, K. Gilkerson to D. Harris for examples of the deficiency. *01/31/02*

7. Initiator:
 Mark T. Peters, Science and
 Engineering Testing Project

Mark T. Peters for
 Date 1/14/02

9. Does a stop work condition exist? (Not required for a DR)

☐ Yes ☒ No

If Yes, Check One:

☐ A ☐ B ☐ C ☐ D

10. Recommended Actions:

"None" *01/29/02*

11. QA Review:

QAR *Donald Harris* Date 1-29-02

12. Response Due Date:

10 working days from issuance

13. DOQA Issuance Approval:

Printed Name Ram Murthy

Signature

James Blaylock

Date 2/6/02

22. Corrective Actions Verified

QAR

Date

23. Closure Approved by:

DOQA

Date



Kenneth Gilkerson

01/31/2002 01:24 PM



To: Don Harris/YD/RWDOE@CRWMS
cc: Larry Abernathy/YM/RWDOE@CRWMS, Roger Henning/YM/RWDOE@CRWMS

Subject: DR BSC-02-D-068

QA:QA Inclusionary

Please attach this e-mail to subject DR to document examples of the condition cited. While BSC intends to document all SITP's that did not meet the 120 day administrative requirement in the "Extent of Condition", it should be noted that some of the subject SITP's were approved shortly after the 120 day "drop dead" date and others have yet to complete the AP-2.14Q process. For example SITP-02-EBS-003 "Field Conductivity Testing" was an ongoing test that was recently approved and issued, but just after the 120 day date. On the other hand, on-going tests (CSNF Colloid Release Testing) at PNNL were documented in SITP-02-WF-008 but this SITP has not yet been approved. Similarly long term testing at ANL have been ongoing but the SITP's are still in comment resolution; i.e. SITP-02-WF-002, "DHLW Degradation and Radionuclide Release in Long Term Tests" and SITP-02-WF-001 "Commercial Spent Fuel and Fuel Rod Segment Degradation and Radionuclide Release in Long Term Tests". The exact tests, predictive analyses and impacts (if any) will be detailed in the BSC response to this DR in the extent of condition. It should also be noted that all of these on-going tests were covered under the AP-2.21Q Planning processes that existed prior to AP-SIII.7Q being a procedural requirements document. Subsequently, it is BSC's initial belief that there is no real impact on data/product for not meeting the arbitrarily established administrative requirement of 120 days to get Test Plans in place. This DR is to document the procedural noncompliance and produce a plan of action for these tests.