



## Department of Energy

Washington, DC 20585

QA: QA

FEB 13 2002

S. H. Swenning  
Bechtel SAIC Company, LLC  
1180 Town Center Drive, M/S 280  
Las Vegas, NV 89144

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT  
(DR) BSC-01-D-127 RESULTING FROM THE OFFICE OF QUALITY ASSURANCE (OQA)  
AUDIT BSC-ARC-01-08

The OQA staff has evaluated the corrective action of DR BSC-01-D-127 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or James V. Voigt at (702) 794-1487.

OQA:JB-0656

Enclosure:  
DR BSC-01-D-127

*James Blaylock for*  
Ram Murthy, Acting Director  
Office of Quality Assurance



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WM-11  
NMSSD7

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

8. ☒ DEFICIENCY REPORT  
☐ CORRECTIVE ACTION  
REPORT

NO. BSC-01-D-127

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DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document:

Office of Civilian Radioactive Waste Management DOE/RW-0333P,  
Rev. 10, *Quality Assurance Requirements and Description (QARD)*

2. Related Report No.:

BSC-ARC-01-08

3. Responsible Organization:

Bechtel SAIC Company, LLC (BSC)

4. Discussed With:

Joe Archuleta, Martha Kohler, Charlie Warren

5. Requirement:

QARD, paragraph 6.2.5c, states: "The disposition of obsolete or superseded documents shall be controlled to ensure that they are not used to perform work."

6. Description of Condition:

Several instances at both Lawrence Livermore National Laboratory and Sandia National Laboratories of obsolete documents were observed to be inadequately controlled to ensure that they are not used to perform work. All but one of the instances was corrected during the audit. Further investigation revealed that these specific obsolete documents had not been accessed for Q-affecting work.

(Continued on page 2)

7. Initiator:

James V. Voigt

Date 8/22/01

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:

Request listing of current, controlled document holders; assess correct revision status and determine if a controlled copy is still required.

11. QA Review:

QAR James V. Voigt

Date 8/30/01

12. Response Due Date:

10 Working Days From Issuance

13. DOQA Issuance Approval:

Printed Name

Robert W. Clark

Signature

James Blaylock

Date

9/6/01

22. Corrective Actions Verified:

QAR

James V. Voigt  
James V. VOIGT

Date 11 February 02

23. Closure Approved by:

DOE/OQA

James Blaylock

Date

2/13/02

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8. ☒ DR/CAR  
☐ Stop Work Order

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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

6 Description of Condition: (continued)

The specific controlled documents found deficient are as follows:

<u>Controlled Copy Holder #</u>	<u>Superseded/Obsolete Documents</u>
L047	All document revisions received within the past year were kept in a stack without any action to either identify or dispose of the outdated/superseded procedures.
L250	TIP-CM-19, Rev. 1, ICN 1
104392	ANL-EBS-MD-000029, Rev. 0 TDP-EBS-MD-000014, Rev. 0 TDP-EBS-MD-000011, Rev. 0, ICN 1 TDP-EBS-MD-000016, Rev. 0, ICN 1
104653	TDP-WIS-PA-000008, Rev. 0 TPB-NGS-MD-000006, Rev. 0
101433	Holder of this set of controlled documents no longer worked on the project, the set had not been updated for ~ 18 months.

## TYPE RESPONSE:

- ☒ Initial  
☐ Complete  
☐ Amended

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## DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)

## 14a. Immediate Actions:

The condition was corrected during Audit BSC-ARC-01-08. AP-6.1Q Revision 6, ECN 01 was approved and issued on 08/17/01. The ECN clarifies the procedure and directly implements the requirement cited in this deficiency (QARD 6.2.5c)

Compliance Date: 08/17/01

## 14. Remedial Actions:

See Attached continuation page 3

## 15. Extent of Condition:

The extent of condition will be provided in the complete response. The initial extent of condition as revealed by the initiator and confirmed by the document holders in 14 above indicates that none of these documents were used to perform work subject to the QARD.

The extent of condition investigation will determine if there are other possible hard copy "controlled" documents that need to be marked obsolete or superseded, or destroyed.

## 16. Cause: (Attach results of root cause determination prepared in accordance with AP-16.4Q for a significant deficiency.)

The cause of condition will be provided in the complete response.

## 17. Action to Preclude Recurrence:

Initial: The cited requirement has been addressed in an implementing procedure. See Block 14a above. The practice of providing instructions to document holders to mark documents obsolete is now proceduralized. This procedure change along with the existing practice of an annual review through the "Document Holders Annual Report" and decontrolling non-responsive document holders should prevent the proliferation of additional problems with controlled documents.

The action to preclude recurrence will be provided in the complete response.

## 18. Due Date: 10/17/01

- ☒ For submittal of complete response  
☐ For completion of corrective action

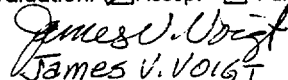
## 19. Response by: S. Swenning



Date 09/19/01 Phone 702-295-1631

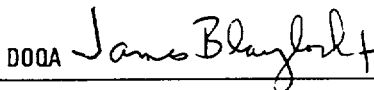
20. Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject

QAR



30 October 01 Date

## 21. Concurrence:



Date 10/14/01

Exhibit AP-16.1Q.1

Rev. 12/20/1999

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8. ☒ DR/CAR  
☐ Stop Work Order

NO BSC-01-D-127

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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Block 14 (continued)

Controlled Copy Holder L047-Documents cited were disposed or marked obsolete.

Controlled Copy Holder L250- Documents cited were disposed or marked obsolete.

Controlled Copy Holder 104392-Documents cited were disposed or marked obsolete.

Controlled Copy Holder 104653-Documents cited were disposed or marked obsolete. Note: no document TBP-NGS-MD-000006, Revision 0 could be located. This is not a recognized document identifier.

Controlled Copy Holder 101433- Documents cited were disposed or marked obsolete.

## TYPE RESPONSE:

- ☐ Initial  
☒ Complete  
☐ Amended

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## DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)

## 14a. Immediate Actions:

Same as 09/19/01 Response

Compliance Date:

## 14. Remedial Actions:

Same as 09/19/01 Response

## 15. Extent of Condition:

The extent of condition is limited to the holders of controlled documents identified in block 14. No impacts were identified.

The Document Holders Report will be issued on or about November 15, 2001 to all controlled document holders to include the implementing procedural requirement to destroy or mark obsolete all superceded documents that have been previously controlled.

No extent of condition investigation is required since the implementation of AP-6.1Q required Document Holders Report will purge the Project of obsolete or superceded documents and AP-16.1Q will be used to identify conditions adverse to quality, i.e., the use of obsolete documents.

## 16. Cause: (Attach results of root cause determination prepared in accordance with AP-16.4Q for a significant deficiency.)

The deficiency was caused because the requirements had not been implemented in a project procedure. Document Holders were not aware or informed of the requirements to destroy or mark obsolete all superceded documents that have been previously controlled.

## 17. Action to Preclude Recurrence:

The procedure has been revised as described in the 09/19/01 response.

## 18. Due Date: October 9, 2001

- ☐ For submittal of complete response  
☒ For completion of corrective action

## 19. Response by: This response has been coordinated with the BSC QE identified in the DR database.

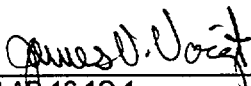
S. Swenning



Date 10/09/2001 Phone 702-295-5184

20. Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject

QAR



Date 10/24/01

## 21. Concurrence:

DDQA James Blaylock

Date 10/29/01

Exhibit AP-16.1Q.1

Rev. 12/20/1999

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8. ☒ DR/CAR  
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DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

CORRECTIVE ACTIONS VERIFIED DEFICIENCY REPORT (DR) BSC-01-D-127

**BLOCK 14a – IMMEDIATE ACTIONS**

**Commitment:** (1) Responsible Manager to issue ECN to AP-6.1Q to correct disconnect with QARD 6.2.5c

**Verification:** (1) ECN 1 issued to AP-6.1Q effective on 8/17/01 adequately meets the above commitment.

**BLOCK 14 – REMEDIAL ACTIONS**

**Commitment:** (1) Controlled Copy Holders will dispose of or mark obsolete those controlled documents that are no longer valid.

**Verification:** (1) Examined Lawrence Livermore National Laboratory (LLNL) Document Holder's Report for copy holder 047 and 250 and confirmed response to annual document holders reports for currently held controlled documents and their statement attesting to removal of any obsolete/superseded controlled documents. Sandia National Laboratory (SNL) letter Jose Archuleta to Document Control dated 2/4/2002 attests to decontrolling of Document Holder 104392.0, in addition all decontrolled/obsolete documents maintained by this individual are properly marked. Obsolete documents held by SNL Copy Holders 101433 and 104653 were confirmed disposed of during the audit (BSC-ARC-01-08).

**BLOCK 15 - EXTENT OF CONDITION**

**Commitment:** (1) The extent of condition limited to holders of controlled documents will be investigated by issuance of the annual Document Holders Report, which purpose is to purge obsolete/superseded controlled project documents.

**Verification:** (1) Examined returned document holder's reports maintained by Pat Gibson in Document Control, these reports were initially issued 11/8/01 and confirmed their return to Document Control.

The Impact Evaluation was addressed and is reasonable based upon auditors statements that no obsolete documents appeared to have been used during work assignments and controlled document holders statements that obsolete documents had not been used in completing work assignments.

**BLOCK 16 – CAUSE**

The cause of the deficient condition, QARD "requirements had not been implemented in a project procedure" is reasonable based upon lack of procedural direction provided to Document Holders.

**BLOCK 17 – ACTION TO PRECLUDE RECURRENCE**

**Commitment:** (1) Revise AP-6.1 to address QARD requirement 6.2.5c.

**Verification:** (1) Revision to AP-6.1 to address QARD requirement 6.2.5c completed and effective on 8/17/2001.

Based upon the satisfactory verification of corrective action commitments described above, it is recommended that this DR be closed.

  
James V. Voigt

7 February 2002  
Date