



## Department of Energy

Washington, DC 20585

QA: QA

MAR 06 2002

C. M. Sparks  
Bechtel SAIC Company, LLC  
1180 Town Center Drive, M/S 761  
Las Vegas, NV 89144

### VERIFICATION OF CORRECTIVE ACTIONS AND CLOSURE OF DEFICIENCY REPORT (DR) BSC-02-D-062

The Office of Quality Assurance staff has evaluated the corrective actions of DR BSC-02-D-062 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 John R. Doyle at (702) 794-5021.

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

OQA:JB-0749

Enclosure:  
DR BSC-02-D-062



Printed with soy ink on recycled paper

*Noted  
DR-02  
John R. Doyle*

MAR 06 2002

cc w/encl:

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

ORIGINAL  
8. ☒ DEFICIENCY REPORT  
☐ CORRECTIVE ACTION REPORT  
NO. BSC-02-D-062  
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QA: *QA 1/23/02*

DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document: NWI-ESF-021Q, Rev. 1, ICN 0		2. Related Report No.: NCR YMSCO-02-0017	
3. Responsible Organization: SITE OPERATIONS		4. Discussed With: R. Dresel, C. Garrett, D. Osborne	
5. Requirement: NWI-ESF-021Q, DIESEL-POWERED EQUIPMENT EMISSIONS TESTING AND CONTROL PROCEDURE, paragraph 3.6, 2, states:  "Ensure fuel samples are taken in accordance with the testing laboratorie's instructions a minimum of once per calendar quarter for analysis of sulphur content".			
6. Description of Condition:  As recorded in NCR YMSCO-02-0017, the diesel sulphur content tests, required by procedure NWI-ESF-021Q, have not been taken since August of 2000.  Pertinent information: The referenced NCR was dispositioned use-as-is based, primarily, on two factors.  1) The requirement to perform diesel fuel sulphur content tests was removed from the Specifications in 1996 (reference DR LVMO-96-D-039 and RFC 96-045) but has not been deleted from the referenced procedure.  2) 40CFR80.29 prohibits the manufacture, import, sell, or transport of any diesel fuel in the U.S.A. with a sulphur content of more than .05% by weight. The DIE sulphur content limit is also .05% by weight.			
7. Initiator: Howard Cox <i>Howard Cox</i> Date 01/09/02		9. Does a stop work condition exist? (Not required for a DR) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Check One: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
10. Recommended Actions:  <i>NONE</i>			
11. QA Review: QAR <i>John Doyle</i> Date 1/29/02.		12. Response Due Date: 10 working days from issuance	
13. DOQA Issuance Approval: Printed Name Ram Murthy Signature <i>James Blaylock Jr</i> Date 1/30/02			
22. Corrective Actions Verified QAR <i>John Doyle</i> Date 2/20/02.		23. Closure Approved by: DOQA <i>James Blaylock Jr</i> Date 3/6/02	

## TYPE RESPONSE:

- ☐ Initial  
☒ Complete  
☐ Amended

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

DR/CAR NO. BSC-02-D-062

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OFF  
 2.12.02

## DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)

## 14a. Immediate Actions:

Block 6 indicates no immediate action was required.

Compliance Date: N/A

## 14. Remedial Actions:

Revise by ECN, NWI-ESF-21Q to more clearly respond to the requirement specified in Specification 01501, Paragraph 3.01 S4, by removing the need for testing and clarifying the means of reporting.

## 15. Extent of Condition:

Investigation of this condition determined that due to 40 CFR 80.29 (see Block 6, Paragraph 2) that no diesel fuel with a sulfur content greater than 0.05% by weight has been delivered or consumed underground. There is no impact to quality.

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

Failure to follow/implement the requirements of NWI-ESF-021Q by Responsible Individual. The cause of the deficiency identified in Block 6, failure to follow/implement procedural requirements, has been previously identified during project performance assessment activities. In response to these assessment identified deficiencies, BSC has initiated a training and mentoring process to emphasize procedural/drawing adherence.

## 17. Action to Preclude Recurrence:

The Responsible Individual subsequently received Procedural Adherence Training as outlined in Block 16.

## 18. Due Date: February 15, 2002

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

## 19. Response by:

Ralph Dresel

Date

2.13.02

Phone 295-7366

BSC QA H 2/13/02

13 Feb. 02

## 20. Evaluation:

- ☒ Accept ☐ Partially Accept ☐ Reject

QA

Date 2/14/02

## 21. Concurrence:

DOQA

James B. Layton

Date

2/15/02

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RADIOACTIVE WASTE MANAGEMENT  
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8. ☒ DR/CAR  
☐ Stop Work Order

BSC-02-D-062  
NO.

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QA: *XQA*

DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Verification of Committed Corrective Actions to Deficiency Report BSC-02-D-062

*DG° 3/5/02*

Block 14a: Immediate Action:

None Required

Block 14 Remedial Actions:

Verified para. 3.6.3 of ECN 0, 1 dtd. 2/26/02, to NW-ESF-21Q Rev. 1 "Diesel -Powered Equipment Emissions Testing and Control Procedure" Rev 1 (clarifying Para. 3.01 S4 of Specification BAB000000-01717-6300-01501) to require " ... certificate of conformance to 40 CFR 80.29, material test reports or other means to identifying the fuel sulfur content ... "

Block 15 Extent of Condition:

See Complete Response.

Block 16 Cause:

See Complete Response

Block 17 Action to Preclude Recurrence:

Verified Safety Meeting Report concerning Strict Adherence Orientation for J. Dudley and J. Williamson dtd. 1/10/02.

The Above Committed Corrective Actions have been satisfactorily verified.

This Deficiency Report is considered closed.

QAR:

*John R. Doyle*

Date:

*2/28/02*

John R. Doyle