Department of Energy
Washington, DC 20585

QA: QA

APR 09 2002

Paula Thompson
Bechtel SAIC Company, LLC
1180 Town Center Drive, M/S 423
Las Vegas, NV 89144

ISSUANCE OF DEFICIENCY REPORT (DR) BSC(O)-02-D-099 RESULTING FROM AN OBSERVATION BY DONALD J. HARRIS

Enclosed is DR BSC(O)-02-D-099 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, Navarro Quality Services, 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.

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

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

OQA:JB-0976

Enclosure:
DR BSC(O)-02-D-099

NMSSO7
WM-11

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
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D. J. Harris, NQS, Las Vegas, NV
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8. ☒ DEFICIENCY REPORT ☐ CORRECTIVE ACTION REPORT
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DEFICIENCY REPORT/CORRECTIVE ACTION REPORT

1. Controlling Document: (Document ID and Revision or Date)	2. Related Report No.:
AP-SI.1Q, Rev. 3, ICN 3, Software Management	N/A
3. Responsible Organization:	**4. Discussed With:**
Bechtel SAIC Company, LLC	Sam Archuleta, David Calloway, Mike Eshleman, Steve Splawn

5. Requirement:
Quality Assurance Requirements and Description (QARD), DOE/RW-0333P, Rev. 10.

1) Section 6.2.3 Reviewing Documents. Documents shall be reviewed in accordance with the requirements of subsection 2.2.10 Document Review.

2) 2.2.10 Document Review

Implementing documents and documents that specify technical or quality requirements shall be reviewed to the following requirements and for any additional requirements specified by the applicable section of the QARD.

6. Description of Condition:

Block 6 Description of Condition:

1. Contrary to the cited requirements, the Administrative Procedure AP-SI.1Q fails to provide for objective evidence (records) that mandatory comments resulting from the independent technical review of the software requirements documents were resolved or objective evidence that the QA program was properly executed.

2. Contrary to the Cited Requirements:

AP-SI.1Q requires an independent technical review of the Software Activity Plan, Requirements Documents, Design Document, Installation Test Plan, Validation Test Plan, Validation Test Report and User Manual. The only objective evidence of the technical review is the signature of the the independent technical reviewer on the cover sheet of each document. However, there is no objective evidence that mandatory comments existed or were resolved satisfactory or objective evidence that the QA program was properly executed as a record, other than the independent technical reviewer's signature.

Has work been stopped? ☐ Yes ☒ No

7. Initiator:	9. Does a stop work condition exist?
Donald J. Harris (Printed Name) Donald J. Harris (Signature) 3/27/02 (Date)	☐ Yes ☒ No ☐ N/A If Yes, Check One: ☐ A ☐ B ☐ C ☐ D

10. Recommended Actions:

Revise AP-SI.1Q to require objective evidence of the independent technical review as a nonpermanent record.

11. QA Review:	12. Response Due Date:
Donald J. HARRIS (Printed Name) Donald J. Harris (Signature) 3/27/02 (Date)	10 Working Days after Issuance

13. QAM Issuance Approval:
Printed Name Ram Murthy Signature James Blaylock Date 4/9/02

14. Corrective Actions Verified/Closure	15. QAM Closure Approval:
QAR Printed Name Signature Date	Printed Name Signature Date

OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
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WASHINGTON, D.C.

[X] DR/CAR/QO
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Block 5 Requirements (cont)

2) 2.2.10 Document Review (continued)

F. Mandatory comments resulting from the review shall be documents and resolved before approving the document.

3) 17.2.1 Classifying Quality Assurance Records

B. Documents that do not meet the requirements for lifetime QA records, but provide objective evidence that the QA program has been properly executed shall be classified as nonpermanent QA records.

NOTE: NUREG-1804, Draft 2, Review Plan for Safety Analysis Report, Consider: 1) Acceptance Criterion 6, Controlled documents are required to include as a minimum, design documents, including documents related to computer software, etc. 2) Acceptance Criterion 17, Quality Assurance records that furnish evidence of quality must be specified, prepared and maintained, results of reviews, inspections, test, audits, material analyses, monitoring of work performance, maintenance and modification procedures and related inspection results, reportable occurrences, computer software, and etc. Nonpermanent records are those documents prescribing the planning, execution and auditing of activities affecting quality.