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# **Office of Civilian Radioactive Waste Management**

## **Compliance Audit of Bechtel SAIC Company, LLC (BSC)**

**OQAC-BSC-03-13  
September 22-26, 2003  
Las Vegas, Nevada**

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## **AUDIT SCOPE**

**This compliance audit was performed by a team of auditors representing OCRWM. The team evaluated implementation of the OCRWM QA program at BSC.**

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## **AUDIT TEAM MEMBERS**

- **John R. Doyle, Navarro Quality Services (NQS),  
Audit Team Leader**
  - **Christian M. Palay, NQS, Audit Team Leader in Training**
  - **Joseph R. (Chip) Miller, BSC, Auditor**
  - **Stephen F. Schuermann, BSC, Auditor**
  - **Robert A. Toro, NQS, Auditor**
  - **William J. Glasser, NQS, Auditor**
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# **OBSERVER**

- **Jack D. Parrot, U.S. Nuclear Regulatory Commission**

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## **QA PROGRAM SECTIONS**

<b>1.0</b>	<b>Organization</b>
<b>2.0</b>	<b>Quality Assurance Program</b>
<b>4.0</b>	<b>Procurement Document Control</b>
<b>5.0</b>	<b>Implementing Documents</b>
<b>6.0</b>	<b>Document Control</b>
<b>7.0</b>	<b>Control Of Purchased Items and Services</b>
<b>15.0</b>	<b>Nonconformances</b>
<b>16.0</b>	<b>Corrective Action</b>
<b>17.0</b>	<b>Quality Assurance Records</b>
<b>18.0</b>	<b>Audits (as applicable to BSC External Audits)</b>
<b>App C</b>	<b>Monitored Geologic Repository</b>

**If the audit team identified a need to verify additional program elements during the audit, they were added to the audit checklist and verified accordingly.**

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# **AUDIT SCHEDULE**

**Pre-Audit Team/Observer Meeting**

**8:00 A.M.**

**September 22, 2003**

**Pre-Audit Conference**

**8:30 A.M.**

**September 22, 2003**

**Audit Activities**

**9:00 A.M. - 4:00 P.M.**

**September 22, 2003**

**8:00 A.M. - 4:00 P.M.**

**September 23-25, 2003**

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## **AUDIT SCHEDULE (Continued)**

**Audit Follow-Up and Closeout**

**8:00 A.M. - 10:30 A.M.  
September 26, 2003**

**Post-Audit Conference**

**11:00 A.M.  
September 26, 2003**

**There was a daily Audit Team/Observer caucus at 4:00 P.M. The Audit Team Leader briefed BSC management daily at 8:15 A.M. These briefings covered potential deficiencies and needed liaisons.**

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## **PROCEDURES UTILIZED TO PERFORM AUDIT**

**The audit was performed in accordance with the latest revisions of the procedures listed below:**

- **Administrative Procedure (AP) AP-18.3Q, *Internal Audit Program***
- **AP-16.1Q, *Management of Conditions Adverse to Quality***



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## **Condition Adverse to Quality # 1**

**There is no objective evidence that LP-1.0Q-BSC (approved 8/12/03) and Directive DIR-GEN-004 BSC "Organizational Structure, Interfaces, Requirements and Responsibilities" (approved 8/28/03) were forwarded and accepted by OQA.**

**This is a violation of LP-1.0Q-BSC, Rev. 03 ICN 0, section 5.5 paragraph b).**

**Furthermore, QARD, Rev. 13, Section 1.2 requires that each affected organization shall prepare one or more controlled documents, accepted by OQA, that describes internal and external organizational interface, organizational structures, requirements.**

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## **Condition Adverse to Quality # 2**

**The content of the Peer Review Report on Igneous Consequences (MOL.20030730.0162) does not contain:**

- 1. Individual statements by the Panelists presenting their advice and recommendations**
- 2. Biographies of the Peer Review Panelists**

**This is a violation of AP-2.12Q, Rev. 0 ICN4, Section 5.3.4 Paragraph c), Items 4) and 6).**

**Only one Peer Review had been completed at the time of the audit.**

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## **Condition Adverse to Quality # 3**

**The Peer Review Reports and Peer Review Evaluation Reports for the Igneous Consequences Peer Review are identified as QA: N/A records.**

**This is a violation of AP-2.12Q, Rev. 0 ICN 4, Section 6.1, which mandates that these records be identified as QA: QA.**

**Only one Peer Review had been completed at the time of the audit.**

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## **Condition Adverse to Quality # 4**

**Two self-assessments, SA-SOP-2003-11 and SA-RDP-2003-007, are designated QA: N/A, but both self-assessment scopes are for QA: QA activities.**

**This is a violation of AP-2.20Q, Rev. 1 ICN 1, section 5.5.1, paragraph a).**

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## **Condition Adverse to Quality # 5**

**There is no objective evidence that BSC Records Management was forwarded the surveillance report BQA-SI-03-009. The surveillance scope covered the implementation of LP-17.1Q-BSC, a procedure implemented by BSC Records Management. BSC Record Management was neither the addressee of the BSC QA issuance memo nor was it on distribution.**

**This is a violation of AP-2.26Q, Rev. 0 ICN 0, section 5.4 paragraph c).**

**Sample size was 12 out of 117.**

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## **Condition Adverse to Quality # 6**

**Document Control personnel had not approved by signature Document Submittals for INEEL Controlled Documents. Submittals are not approved; the appropriate implementing procedure that created the INEEL documents was not identified.**

**This is a violation of AP-6.1Q, Rev. 7 ICN 1, Section 5.3.2.**

**Condition appears isolated at this time to INEEL documents posted on OPDD.**

**Sample size was 20 out of approximately 1,700 controlled documents.**

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## **Condition Adverse to Quality # 7**

**No Document Submittal form can be found for the Procedure Responsibilities Matrix that is posted on OCRWM Program Document Database.**

**This violates AP-6.1Q, Rev. 7 ICN 1, section 5.3.1, paragraph c).**

**Sample size was 27 posted documents on OPDD.**

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## **Condition Adverse to Quality # 8**

**The bid tabulation form (L71-1, Rev. 01/31/2002) in PO# 004223 for "Weld Filler Material and Base Metal Composition Test" from Wah Chang-Allegheny Technologies Co. was not used to approve the bid tabulation. A graphical display addressing bid tabulation information was used instead, but this graphical display was not signed by the Requester, Discipline Lead Engineer/Responsible Manager or the Project Manager/Functional Manager**

**This violates LP-7.1Q-BSC, Rev. 0 ICN 1, sections 5.4.1, 5.4.2, 5.4.4.**

**Sample size was 5 out of 33 "Q" contracts, excluding National Laboratory Contracts. Of those 5 reviewed, 2 were sole source contracts and did require the form, leaving 3 that were required to use the form. The other 2 did use the correct form. Therefore, this condition was determined isolated by the audit team.**



# **Condition Adverse to Quality # 9**

## **AP-16.1Q Process Noncompliances**

1. Transition of open deficiency documents from Revision 5 to Revision 6 required the addition of a CR cover page for each open deficiency. One DR, BSC(V)-03-D-117, did not have the required cover page (Rev. 6 Section 2) (16 cover pages for this attribute).
2. The significance of a deficiency is to be re-evaluated as part of a response and QA review of the response. One of 24 deficiencies did not have the response preparation significance box checked and 12 of 24 did not have the QA re-evaluation for significance (Rev. 5, section 5.7.2 paragraph c) (Rev. 6, Attachment 6, blocks 3 and 11, and section 5.5.3 paragraph b).
3. Block number 3 on DR BSC(B)-03-D-158 for Extended Processing Applicability was not addressed (Rev 5, Attachment 11 response instruction for block 3) (21 documents reviewed).
4. DR BSC(B)-02-D-169 void documentation does not have signature of QAR or a request for acknowledgement by the initiator. The void documentation requested concurrence by the initiator, who indicated a preference to not sign the documentation. (Rev. 5 Section 5.3.1 paragraph c (6 documents reviewed).
5. BSC(B)-03-D-170 block 9 relative to stop work was not completed. (Rev. 5 attachment 10 block 9 instructions ( 24 documents reviewed).

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## **Condition Adverse to Quality # 10**

**The DR/CAR database did not reflect the stop work condition documents on two BSC vendor CARs: USGS(V)-02-C-161 and USGS(V)-03-C-095.**

**This is a violation of AP-16.1Q, Rev 5, Attachment 7, section 3.0**

**These DR/CAR database entries were fixed.**

**This condition was determined to be isolated.**

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## **Condition Adverse to Quality # 11**

**BSC(B)-03-D-188 indicated in block 13 (cover page) a request for Impact and Action to Preclude recurrence. The Condition Report Response indicated that responses in these areas were not required based on the Condition Report. Discussion with the QAR indicated that the boxes were inadvertently checked shortly after the response was prepared.**

**This is a violation of AP-16.1Q, Rev 6, section 5.3.1 paragraph I.**

**This condition was fixed and determined to be isolated.**

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## **Condition Adverse to Quality # 12**

**There were no quality designations (QA: QA) for the following drawings submitted to Document Control:**

- 1. BSC Supplier Document No. V0M00Z-QPA0-05391-00023-001, General Arrangement Cask & WP Receipt Buildings Plan View & Sections**
- 2. BSC Supplier Document No. V0M00Z-QPA0-05391-00021-001, Cask Handling System Block Flow Diagram Level 2**

**The Supplier Document Status affixed to these documents also does not provide a quality designator.**

**This is a violation of AP-17.1Q, Revision 2 ICN 5, Section 5.2 paragraph c) item 3.**

**Sample size was these 2 Supplier Submittals.**

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## **Condition Adverse to Quality # 13**

**There were no quality designations (QA: QA) for the following drawings submitted to Document Control:**

- 1. BSC Supplier Document No. V0M00Z-QPA0-05391-00023-001, General Arrangement Cask & WP Receipt Buildings Plan View & Sections**
- 2. BSC Supplier Document No. V0M00Z-QPA0-05391-00021-001, Cask Handling System Block Flow Diagram Level 2**

**The Supplier Document Status affixed to these documents also does not provide a quality designator.**

**This is a violation of AP-17.1Q, Revision 2 ICN 5, Section 5.2 paragraph c) item 3.**

**Sample size was these 2 Supplier Submittals.**

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## **Condition Adverse to Quality # 14**

**The Notification and Audit Plan for BQA-AS-03-06 of Westbay Instruments, Inc. does not include the supplier activities being audited.**

**This is a violation of AP-18.2Q, Rev. 0 ICN 1, Section 5.3.1, Paragraph c).**

**Sample size was 6 out of approximately 50 external audits.**

**This condition was determined to be isolated.**

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## **Recommendation # 1**

**Field Work Package documents are not numbered consistently. The current numbering method is governed by AP-5.2Q, Rev. 1 ICN 0, section 5.1 Paragraph b.**

**Examples include:**

- 1. FWP-SBT-PA-000001, Rev. 0, Inyo County Drilling and Testing Program**
- 2. FWP-ESF-PA-001, Rev. 0 - Geological Mapping**
- 3. FWP-ESF-PA-002, Rev. 0 - Consolidated Sampling)**

**The audit team recommends that the current numbering method be consistent, as is the new numbering process in AP-5.1Q, Attachment 5.**

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## **Recommendation # 2**

**In the current revision of AP-5.1Q, the definition of “Revision” and “ICN” are stated as follows:**

**"Revision - A method of changing a procedure to make changes other than ICNs or editorial changes to fulfill a need to improve a procedure."**

**"Interim Change Notice (ICN) - A method of changing a procedure where the changes are typically of a narrower scope than a revision."**

**The audit recommends that AP-5.1Q have more precise definitions to “Revision” and “ICN”**

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## **Noteworthy Practice**

**The subcontract administrators (Gwen Jacquet & Ron Butturini) for contract No. QA-HC4-0001, New England Research Inc., should be recognized for this contract's excellent documentation package.**

**This package was the best one audited and should be used as the standard to other subcontract documentation packages.**

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## **Results**

**Overall programmatic implementation is effective with the exception of the the Conditions Adverse to Quality noted.**