

APPENDIX A

NOTICE OF DEFICIENCY

Based on the results of an NRC audit of the USGS QA program conducted on September 16-20, 1991, it appears that certain QA requirements were not being implemented. Deficiencies with regard to implementation are as follows:

1. Section 5.3.1 of YMP-USGS-QMP-6.01 "Document Control," Revision 5 states, in part, "The PI may issue sub-issue copies of a 'controlled' technical procedure to personnel under his/her direction. These copies of the latest revision of the technical procedure shall be 'checked' out to the technical person via a check-out log...."

Section 5.3.2 of QMP 6.01 "Document Control," Revision 5, states in part, "If the procedure is revised or rescinded, the PI is responsible for retrieving the sub-issue document."

Contrary to the above, there was a packet containing six technical "HP" procedures at well site USW WT-16 in a USGS van, but (a) there was no documented evidence that the PI used a check-out log for the distribution of the documents, and (b) Revision 0 of HP-26 "Method for Calibrating Water-Level Measurement Equipment Using the Reference Steel Tape" which was superseded by Revision 1 on June 18, 1990 was in the packet. (Level 3)

2. Section 8.4 of YMP-USGS-QAPP-01, Revision 5 states, in part, "Data generated from a YMP-USGS scientific investigation shall be identified.... Identification of such data shall be provided in all documents.... The identification of YMP data shall include a reference to the origin of the data...."

Contrary to the above, at well site USW H-6, the logbook did not identify the data collection platform (DCP) by either model number and/or serial number. (Level 3)

3. Section 7.1 of NWM-USGS-HP-60 "Method for Monitoring Water Level Changes Using Pressure Transducers," Revision 1 states, in part, "All documents shall be signed (or initialed) and dated by the investigator on a daily basis as entries are made."

Contrary to the above, at well site USW WT-11, entries were made in the logbook for April 24, 1991, but the logbook was not signed or initialed by the field technician. (Level 3)

4. Section 5.4.2 of YMP-USGS-QMP-5.05 "Scientific Notebook System," Revision 2 states, in part, "In-process entries [in the Scientific Notebook (SN)] shall provide the following information as appropriate:

Description of the experiment or research attempted, including detailed step-by-step process followed; either by reference to implementing procedure or by actual entry into the notebook...

Conditions which may adversely affect the results of the experiment or research investigation...."

Contrary to the above, the SN for collecting scientific data from well sites USW WT-11 and USW H-6 did not reference source documents or describe the step-by-step process for collecting and dumping data from the DCP.
(Level 3)