



Department of Energy

Nevada Operations Office

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JAN 03 1990

WBS 1.2.9.3

QA

Larry R. Hayes
Technical Project Officer for Yucca Mountain Project
U.S. Geological Survey
101 Convention Center Drive
Suite 860
Las Vegas, NV 89109

ACCEPTANCE OF RESPONSES TO STANDARD DEFICIENCY REPORT (SDR) 417, REVISION 0,
RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE (PROJECT OFFICE) QUALITY
ASSURANCE (QA) AUDIT 89-4 OF U.S. GEOLOGICAL SURVEY (USGS)

The Project Office QA staff has evaluated and accepted your responses to SDR 417, Revision 0, generated as a result of Project Office QA Audit 89-4 of USGS. This acceptance includes your original response dated October 10, 1989, and the two additional amended responses dated October 26, 1989, and December 15, 1989.

The SDR will be closed after verification of satisfactory completion of the specified corrective actions. A copy of the SDR is enclosed for your information.

Verification of completion of your corrective action will be performed after the effective dates that were provided. Any extension to these due dates must be requested in writing with appropriate justification prior to the due date. Please send copies of the extension request to Nita J. Brogan, Science Applications International Corporation, 101 Convention Center Drive, Las Vegas, Nevada 89109, and Ralph W. Gray, U.S. Department of Energy, P.O. Box 98518, Las Vegas, Nevada 89193.

If you have any questions, please contact James Blaylock of my staff at (702) 794-7913 or FTS 544-7913, or Sidney L. Crawford of Science Applications International Corporation at (702) 794-7165 or FTS 544-7165.

James Blaylock
Donald G. Horton, Director
Quality Assurance Division
Yucca Mountain Project Office

YMP:JB-1379

Enclosure:
SDR 417, Revision 0

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PDR WASTE
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YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization	1 Date August 16, 1989		2 Severity Level <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3		Page 1 of 2
	3 Discovered During Audit 89-4		3a Identified By S. L. Crawford		4 SDR No. 417 Rev. 0
	5 Organization USGS		6 Person(s) Contacted W. Langer		7 Response Due Date is 20 Working Days from Date of Transmittal
	8 Requirement (Audit Checklist Reference, if Applicable) NNWSI/88-9, Section III, Para. 1.3.1, requires "The responsible Participating Organization shall conduct a technical review of the scientific investigation planning document.... The results of this technical review, and the				
Completed by Originating QA Organization	9 Deficiency 1. Technical reviews conducted by Study Plans SP 8.3.1.2.1.2, 8.3.1.2.2.6, 8.3.1.2.3.1, and 8.3.1.16.1.1, although stated by the USGS submittal letters				
	10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input type="checkbox"/> Investigative <input type="checkbox"/> Corrective Perform all new technical review per the current QMP-3.07. Document the results of the evaluations, reviews, and reviewer's comment resolution. Assure that future Study Plans submitted to YMP are supported by properly				
	11 QAE/Lead Auditor/Date <i>W. Langer 2/28/89</i> 12 Division Manager/Date <i>W. Langer 2/28/89</i> 13 Project Quality Mgr./Date <i>James Blaylock 8/28/89</i>				
Completed by Organization in Block 5	14 Remedial/Investigative Action(s) See attached response				15 Effective Date 12-15-89
	16 Cause of the Condition & Corrective Action to Prevent Recurrence Not applicable for this Level 3 SDR.				17 Effective Date N/A
	18 Signature/Date <i>Donald L. Jorgensen 10/10/89</i> Chief, Nuclear Hydrology Program USGS, Yucca Mtn. Project Branch				
Comp. by Orig. QA Org.	19 Response Accepted	QAE/Lead Auditor/Date <i>W. Langer 12/22/89</i>	Division Manager/Date <i>W. Langer 12/26/89</i>	Project Quality Mgr./Date <i>James Blaylock 12/27/89</i>	
	20 Corrective Action Verif. Satisfactory	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date	
	21 Remarks <i>Unintended Response Rec'd 10/30/89 - (dated 10/26/89). Additional schedule for completion of remedial action (Block 14 above) forwarded by USGS letter, 12/15/89. New EFFECTIVE DATE (Block 15) is February 1, 1990.</i>				
Comp. by Orig. QA Org.	22 QA CLOSURE				
	QAE/Lead Auditor/Date	Division Manager/Date	PQM/Date		

ENCLOSURE

**YMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET**

**N-QA-038
12/88**

SDR No. 417

Rev. 0

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8 Requirement (continued)

resolution of any comments by the reviewer or reviewers shall be documented, and shall become a part of the QA records."

YMP Procedure AP-1.10Q, Para. 5.1.2, requires "Participating organizations perform technical reviews of Study Plans prepared or revised by them in accordance with their procedures." Paragraph 3.11 defines Technical Reviews, in part, as: "in-depth, critical analyses and evaluations of documents, material, and data." USGS technical reviews are to be performed in accordance with QMP-3.07.

9 Deficiency (continued)

to meet the preparation and review requirements of AP-1.10Q, were performed on draft versions of the Study Plans that did not include sections required by AP-1.10Q. The later Study Plan versions that did comply with AP-1.10Q and were submitted to YMP were not subjected to new technical reviews. This contributed, in part, to the numerous discrepancies noted related to QALAs included in the Study Plans, identified in an Observation generated on this subject. The technical reviews were not performed in accordance with the revision of QMP-3.07 in effect at the time of submittal of the Study Plan.

2.

The documentation of technical reviews performed for the above listed Study Plans did not provide evidence of resolution of reviewer's comments or reviewer acknowledgement of comment resolution.

3.

Technical reviews for Study Plan SP 8.3.1.2.1.2 were conducted November 22, 1988 and December 13, 1988 following USGS procedure QMP-3.07, Revision 0; QMP-3.07, Revision 1, was issued effective November 4, 1988 and, if used, would have documented acceptance of reviewer's comments.

10 Recommended Action(s) (continued)

documented technical reviews.

RESPONSE FOR YMPO STANDARD DEFICIENCY REPORT NO. 417

BLOCK 14 REMEDIAL/INVESTIGATIVE ACTION(S):

The noted deficiency affects only the four (4) Study Plans identified in the SDR. The extent of this deficiency was confirmed by YMPO Surveillance YMP-SR-89-133.

The files for Study Plans 8.3.1.2.1.2, 8.3.1.2.2.6, 8.3.1.2.3.1, and 8.3.1.16.1.1 will be evaluated to determine the documentation and comment resolution required by the appropriate revision of QMP-3.07 in effect at the time of USGS technical reviews. Unresolved comments that are identified in this investigation will be categorized as major or minor and will be resolved by the authors and reviewers on comment resolution forms that are required by the current version of QMP-3.07, R2. This action is anticipated to be completed by 11-30-89.

The four (4) Study Plans will be reviewed to determine if any substantial changes have been made in the documents that may require additional technical review. If needed, the technical reviews will be completed for any part of the Study Plans that contain significant modification and did not receive a follow-up technical review. A schedule for completion of this action will be provided by 12-15-89.

BLOCK 15 EFFECTIVE DATE: 12-15-89

AMENDED RESPONSE FOR YMPO STANDARD DEFICIENCY REPORT NO. 417

The following response will replace the 10-10-89 USGS response. This amended response addresses a fifth Study Plan, referred to in the August YMPO Surveillance YMP-SR-89-133 report that inadvertently omitted the number of the Study Plan. The amended information is underlined.

BLOCK 14 REMEDIAL/INVESTIGATIVE ACTION(S):

The noted deficiency affects only five Study Plans: four identified in the SDR, and one referred to in YMPO Surveillance YMP-SR-89-133.

The files for Study Plans 8.3.1.2.1.2, 8.3.1.2.2.6, 8.3.1.2.3.1, 8.3.1.16.1.1, and 8.3.1.2.2.1 will be evaluated to determine the documentation and comment resolution required by the appropriate revision of QMP-3.07 in effect at the time of USGS technical reviews. Unresolved comments that are identified in this investigation will be categorized as major or minor and will be resolved by the authors and reviewers on comment resolution forms that are required by the current version of QMP-3.07, R2. This action is anticipated to be completed by 11-30-89.

The five Study Plans will be reviewed to determine if any substantial changes have been made in the documents that may require additional technical review. If needed, the technical reviews will be completed for any part of the Study Plans that contain significant modification and did not receive a follow-up technical review. A schedule for completion of this action will be provided by 12-15-89.

BLOCK 15 EFFECTIVE DATE: 12-15-89

STATUS OF REMEDIAL/INVESTIGATIVE ACTIONS FOR YMPO SDR NO. 417

BLOCK 14 REMEDIAL/INVESTIGATIVE ACTION(S):

The five (5) Study Plans and related files have been critically reviewed. The review copies for each Study Plan were compared to the most current version of each document to determine if reviewer comments had been addressed. The editorial, quality assurance and technical comments identified by reviewers were tabulated on spread sheets that noted the disposition for each comment. Additionally, summaries were prepared to describe the changes that were made in each revision of a Study Plan.

The items of concern identified in SDR 417 that pertained to Quality Assurance Level Assignment Sheets (QALAS) were corrected in response to the YMPO Audit Observation 89-4-03.

Analyses of the spread-sheet documentation indicates that there were no unresolved major comments resulting from the technical reviews for Study Plans 8.3.1.2.2.6 (GASEOUS PHASE MOVEMENT IN THE UZ) and 8.3.1.16.1.1 (FLOOD POTENTIAL). There are no additional actions for these Study Plans.

There were no unresolved major comments from the technical reviews for Study Plan 8.3.1.2.1.2 (REGIONAL SURFACE WATER RUNOFF), but outdated versions of the comment resolution forms (CRFs) were used. The technical reviewers were contacted and are providing their comments on the appropriate CRF sheets. These materials will be checked by the appropriate investigator and included in the Study Plan file upon receipt. It is anticipated that this task will be completed by the end of January 1990.

Study Plan 8.3.1.2.2.1 (UZ INFILTRATION) was submitted for another technical review on 9/11/89. This review was completed and forwarded to the author on 11/17/89 with all comments listed on spread sheets with attached CRFs. The review comments will be addressed as needed during the upcoming revision for the Study Plan. No additional actions are required for this SDR.

A few unresolved comments were noted during the comment tracking process for Study Plan 8.3.1.2.3.1 (SITE SZ GROUND WATER FLOW SYSTEM). This document is currently being updated by the authors in response to comments made by DOE Project Office and Headquarters reviewers. All required review comment documentation will be included with the revised Study Plan. No additional actions are required for this SDR.

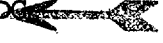
BLOCK 15 EFFECTIVE DATE: February 1, 1990

Larry R. Hayes

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JAN 03 1990

cc w/encl:

Ralph Stein, HQ (RW-30) FORS
D. E. Shelor, HQ (RW-3) FORS
J. R. Willmon, USGS, Denver, CO
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-22
S. L. Crawford, SAIC, Las Vegas, NV, 517/T-06
S. R. Dana, SAIC, Las Vegas, NV, 517/T-06
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Cynthia Robertson, SAIC, Las Vegas, NV, 517/T-22
S. W. Zimmerman, NWPO, Carson City, NV
J. E. Kennedy, NRC, Washington, DC 

cc w/o encl:

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