



Department of Energy
Yucca Mountain Site Characterization
Project Office
P. O. Box 98608
Las Vegas, NV 89193-8608

WBS 1.2.9.3
QA

JAN 18 1991

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

ACCEPTANCE OF AMENDED RESPONSE TO STANDARD DEFICIENCY REPORT (SDR) 560,
REVISION 0, RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION
(YMQAD) AUDIT 90-03 OF U.S. GEOLOGICAL SURVEY (USGS)

The YMQAD staff has evaluated and accepted your amended response to SDR 560,
Revision 0, generated as a result of YMQAD Audit 90-03 of USGS. 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 date that was provided. Extensions to 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.

If you have any questions, please contact either Catherine E. Hampton at
794-7973 or Richard L. Weeks at 794-7853.

Donald G. Horton
Donald G. Horton, Director
Yucca Mountain Quality Assurance Division

YMQAD:CEH-1728

Enclosure:
SDR 560, Revision 0

cc w/encl:
K. R. Hooks, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
D. H. Appel, USGS, Denver, CO
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08

cc w/o encl:
J. W. Gilray, NRC, Las Vegas, NV
D. D. Porter, SAIC, Golden, CO

YMP-5

9101290398 910118

PDR WASTE
WM-11

PDR

102.7
102.7
WM-11
NH03

YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization	1 Date 6-28-90		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 2	
	3 Discovered During YMP-90-03		3a Identified By R. Weeks and B. Hurley		4 SDR No. 560 Rev. 0	
	5 Organization USGS		6 Person(s) Contacted R. Spengler and R. Luckey		7 Response Due Date is 20 Working Days from Date of Transmittal	
	8 Requirement (Audit Checklist Reference, if Applicable) AP-1.7Q, Revision 2, Paragraph 2.0 states in part, " This procedure is applicable to the Project Office and all other Project participants and to Project records generated, purchased, received, and/or maintained as					
Completed by Organization in Block 5	9 Deficiency Contrary to the above requirement, YMP-USGS-QMP-17.01, Revision 3, fails to implement the above stated requirement of AP-1.7Q. As a result of this condition, USGS investigators have collected data for more than					
	10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective					
	11 QAE/Lead Auditor/Date <i>Richard L. Weeks 7/16/90</i>		12 Division Manager/Date <i>N/A</i>		13 Project Quality Mgr./Date <i>Allen Hayes 7-17-90</i>	
Completed by Organization in Block 5	14 Remedial/Investigative Action(s) See Attached Response.					15 Effective Date _____
	16 Cause of the Condition & Corrective Action to Prevent Recurrence SEE ATTACHED RESPONSE					17 Effective Date _____
	18 Signature/Date <i>Larry R. Horton 8/20/90</i> <i>Allen Hayes 8/20/90</i>					
Comp. by Orig. QA Org.	19 Response Accepted	QAE/Lead Auditor/Date <i>Richard L. Weeks 1/11/91</i>	Division Manager/Date <i>N/A</i>	Project Quality Mgr./Date <i>Allen Hayes 1/11/91</i>		
	20 Corrective Action Verif. Satisfactory	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date		
	21 Remarks Response, Hayes to Horton, 8-20-90 Request Amended Response 10/5/90 - QA:CEH-133 Request Response Extension 10/14/90 - Hayes to Horton - Accepted 11/6/90 - QA:CEH-68Y Request Response Extension 10/20/90 - Hayes to Horton - Accepted 11/7/90 - QA:CEH-723 Amended Response 11/8/90 - Hayes to Horton					
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
2/89

SDR No. 560

Page 2 of 2

8 Requirement (continued)

a result of Project activities and functions...."

AP-1.7Q, Revision 2, Paragraph 5.5.4.3 states in part, " Interim record packages (data) shall be compiled and submitted to an LRC at 45 day intervals to ensure that all records are protected, accessible, and retrievable for Project use...."

9 Deficiency (continued)

80 days without submitting data to the Local Records Center (LRC).

Examples:

- 1) Data collected as part of Activity 8.3.1.4.2.2.2 has not been submitted to the LRC within the required 45 day period.
- 2) Data collected as part of Activity 8.3.1.5.2.1.3 has not been submitted to the LRC within the required 45 day period.
- 3) Data collected as part of Activity 8.3.1.2.3.1.2 has not been submitted to the LRC within the required 45 day period.

USGS RESPONSE TO YMPO STANDARD DEFICIENCY REPORT (SDR) NO. 560

Page 1 of 1

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

The DOE/YMP Records Management Plan, Revision 1, became effective on June 23, 1990; therefore, AP-1.7Q was cancelled by the Project Office on July 5, 1990. This action eliminated the cited deficiency. Remedial actions are not warranted.

BLOCK 15: EFFECTIVE DATE: Complete.

BLOCK 16: CAUSE OF THE CONDITION & CORRECTIVE ACTION TO PREVENT RECURRENCE:

Cause: The USGS QA program relied upon DOE/YMP Ap-1.7Q and AP-5.1Q to provide project guidance regarding records and data. The USGS-QMP-17.01 was not revised to include the cited AP-1.7Q requirement because the requirement for data submittal requirements differed from that in AP-5.1Q. Also, Records Management personnel had been advised that AP-1.7Q would be cancelled.

Preventive Action(s): The USGS planned to implement AP-5.1Q directly without a USGS QMP, and has withheld issuance of AP-5.1Q for instruction and implementation until questions regarding data controls (such as the 45-day time-frame) have been resolved. The USGS will issue a guidance document with AP-5.1Q to clarify USGS data controls to be implemented.

BLOCK 17: EFFECTIVE DATE: October 1, 1990 - Estimate that AP-5.1Q will be ready to issue with USGS Guidance Document.

USGS AMENDED RESPONSE TO YMPO SDR 560

Page 1 of 1

This response is intended to replace the 8-20-90 response.

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

Remedial actions are not warranted because data are submitted in support of publications. QMP-17.01, R3, paragraphs 5.1.1.4 and 5.1.9.3 state:

"The backup data package, which includes all supporting records to the manuscript, is submitted by the Record Source to the LRC upon publication of manuscript."

"The assigned Record Source must ensure that all original backup records are submitted to the LRC as a package upon report publication."

QMP-17.01, R4 became effective September 24, 1990 and also requires backup data to be submitted as a support package to publications.

BLOCK 16: CAUSE OF CONDITION & CORRECTIVE ACTION TO PREVENT RECURRENCE:

Cause:

The USGS had originally intended to implement the AP-1.7Q requirements for Interim Records Packages of data by incorporation into QMP-17.01. Prior to revision of the QMP, a memorandum was planned to be issued to the Principle Investigators informing them of the requirement. However, before the subject memorandum was released, USGS management determined that data submittals of unreviewed raw data was not in line with USGS policy. Therefore, the memorandum was not issued.

Upon Project Office issuance of AP-5.1Q, the USGS identified a conflict in the requirements for data submittals as stated by AP-5.1Q and AP-1.7Q. The USGS planned to implement the requirements as stated in AP-5.1Q in lieu of AP-1.7Q for technical data submittals because the AP-5.1Q requirement allowed sufficient time for quality checks prior to the required data submittals.

Preventive Actions:

The USGS currently plans to implement AP-5.1Q for all on-going monitoring and re-start activities.

BLOCK 17: EFFECTIVE DATE: December 7, 1990

BLOCK 18: SIGNATURE/DATE: *Sam R. Hines* *Approved by [Signature] 11/06/90*

Str dtd 11/8/90 - Hayes to Norton