



Department of Energy

Yucca Mountain Project Office

P. O. Box 98608

Las Vegas, NV 89193-8608

WBS 1.2.9.3

QA

OCT 20 1990

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 OBSERVATIONS RESULTING FROM YUCCA MOUNTAIN
PROJECT OFFICE (PROJECT OFFICE) QUALITY ASSURANCE (QA) AUDIT 90-03 OF
U.S. GEOLOGICAL SURVEY (USGS)

The Project Office QA staff has evaluated the responses to
Observations 90-03-01 through 90-03-10, generated as a result of
Project Office QA Audit 90-03 of USGS. The responses to these
observations are acceptable. Copies of the observations are enclosed
for your information.

If you have any questions, please contact either Catherine E. Hampton at
794-7973 or Richard L. Maudlin at 794-7290 of the Yucca Mountain Project
QA staff.

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

QA:CEH-547

Enclosures:
Observations 90-03-01
through 90-03-10

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

YMP-5

9011050332 901029
PDR WASTE
WM-11 PDC

FULL TEXT ASCII SCAN

102.7
WM-11
NH03

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-03-10N-QA-012
4/89

Completed by Originating Organization

2 Noted During: YMP-90-03

3 Identified By: R. Weeks/M. Meyer

4 Date:
6-28-90

5 Organization: USGS

6 Person(s) Contacted:
Peggy Warner7 Response Due Date
is 20 Days from Date
of Transmittal

8 Discussion:

Record package GS.89.M000112 was transmitted from the USGS LRC to the CRF stating that 786 pages were present in the record package; however, the CRF stated the page count to be 601 pages on the returned copy of the LRC Record Transmittal form. There is no indication that the LRC attempted to resolve the discrepancy that existed between the different page counts.

9 QAE/Lead Auditor

Date

Richard L. Weeks

7/16/90

10 Branch Manager

Date

John Hampton

7-17-90

Completed by Respondee

11 Response:

See Attached Response.

12 Signature:

Larry R. Hayes

Date: 8/20/90

Completed by QA Org.

13 Response Receipt Acceptable ☒

Initiator

Date

Richard L. Weeks

10/9/90

QA/Lead Auditor

Date

*John Hampton*Don
10/15/90*JB Maudsl*

10/11/90

14 Remarks:

Page

1 of 1

ENCLOSURE

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-10

Page 1 of 1

BLOCK 11 RESPONSE:

An investigation of this condition revealed that in fact USGS LRC had counted 786 pages and DOE/YMP CRF had counted 601 pages. Nothing was missing or lost. This discrepancy is attributable to the fact that each organization counted the copied pages from a scientist's logbook differently.

The LRC copied the logbook with two logbook pages per sheet. Therefore, when counting logbook pages to record on the Table of Contents, the LRC counted the actual logbook pages, not the number of copy pages. The CRF counted each sheet of copy paper received. Therefore, the portion of the record packages including logbooks was counted differently than the LRC count. CRF changed the page count on the LRC transmittal, but did not change or justify the change on the Table of Contents, or notify LRC of the change.

The LRC will watch for changes of this nature when CRF returns LRC transmittal records. LRC will contact CRF and obtain explanations when possible.

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-03-09

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-03		3 Identified By: C.C. Warren		4 Date: 6-26-90	
	5 Organization: USGS		6 Person(s) Contacted: J. Ziemba		7 Response Due Date is 20 Days from Date of Transmittal	
	<p>8 Discussion:</p> <p>Procedure YMP-USGS-QMP-16.01, Rev. 3 requires the initiator of a CAR to include in the description (part 4) a statement of immediate actions taken to remedy specific conditions, if immediate actions were necessary.</p> <p>None of the CARs reviewed during the audit included a statement of immediate actions taken although the following CAR identified conditions that appeared to require immediate action.</p>					
Completed by Respondee	9 QAE/Lead Auditor <i>C.C. Warren</i>		Date 7-17-90		10 Branch Manager <i>John H. ...</i>	
					Date 7-17-90	
Completed by QA Org.	11 Response: See Attached Response.					
	12 Signature: <i>[Signature]</i> Date: 8/20/90					
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>		<div> <div> Initiator <i>C.C. Warren</i> </div> <div> Date 9-28-90 </div> </div> <div> <div> QA/Lead Auditor <i>[Signature]</i> </div> <div> Date 09-28-90 </div> </div>			
	14 Remarks:					

Page

1 of 2

CONTINUATION PAGE

8 Discussion: (continued)

CAR 89-14, "ADVERSE TREND IN CALIBRATION OF EQUIPMENT" CARs reviewed were 89-10, 89-11, 89-12, 89-13, 89-14, and 90-01.

Page

2 of 2

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-09

Page 1 of 1

BLOCK 11 RESPONSE:

The response to CAR-89-14, signed less than two weeks after its issuance, included the results of an initial evaluation and also the statement "Remedial actions are being taken for each deficiency document identified and are not warranted as a result of this CAR."

The USGS is considering modifying the CAR form to include a box or area for identifying immediate actions or for explaining why no immediate actions are needed.

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-03-08

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-03		3 Identified By: C.C. Warren		4 Date: 6-26-90	
	5 Organization: USGS		6 Person(s) Contacted: J. Ziemba		7 Response Due Date is 20 Days from Date of Transmittal	
	<p>8 Discussion:</p> <p>Procedure YMP-USGS-QMP-16.01, Rev. 3 requires responsible management to identify cause and propose appropriate corrective action to prevent recurrence or provide a plan describing future actions to resolve the CAR.</p> <p>A cause/corrective actions to prevent recurrence or a plan describing future actions to resolve the CAR were not clearly identified in the accepted response to CAR 89-11.</p>					
	9 QAE/Lead Auditor <i>C.C. Warren</i>		Date 7-16-90		10 Branch Manager <i>Edna Hampton</i> 7/17/90	
Completed by Respondee	11 Response: See Attached Response.					
	12 Signature: <i>[Signature]</i> Date: 8/20/90					
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>		<i>[Signature]</i> 10/19/90 QA/Lead Auditor Date			
	Initiator <i>C.C. Warren</i>		Date 10-12-90		<i>[Signature]</i> QA/Lead Auditor Date <i>[Signature]</i> 10-12-90	
<p>14 Remarks:</p> <p>THE RESPONSE EXPLAINS THE WEAKNESS IDENTIFIED FOR CAR 89-11. HOWEVER, CAUSES SHOULD BE IDENTIFIED IN THE RESPONSES TO CARs... NOT WHEN THEY ARE ISSUED.</p> <p style="text-align: right;">COW</p>						
						Page 1 of 1

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-08

Page 1 of 1

BLOCK 11 RESPONSE:

The cause statement for CARS is required in the initial issue of the CAR, not in the response. Five root causes were identified in CAR-89-11. The response to the CAR is the plan describing actions to resolve the CAR.

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-03-07

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-03		3 Identified By: C.C. Warren		4 Date: 6-26-90	
	5 Organization: USGS		6 Person(s) Contacted: J. Ziemba		7 Response Due Date is 20 Days from Date of Transmittal	
	8 Discussion: <p>Procedure YMP-USGS-QMP-16.01, Rev. 3 requires verification of completion of corrective action for CARs be accomplished by audit, surveillance, or management review of the affected activity.</p> <p>Verification of completion of corrective action for CAR 89-13 was accomplished by surveillance and found "not to be adequate or effective". Revision 1 to CAR 89-13 was issued to document this unsatisfactory verification. No additional corrective action was specified in the response to CAR 89-13, Rev. 1</p>					
	9 QAE/Lead Auditor C.C. Wann		Date 7-16-90		10 Branch Manager Catherine H. [Signature] 7-17-90	
Completed by Respondee	11 Response: See Attached Response.					
	12 Signature: [Signature] Date: 8/20/90					
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>		<div> <div> 13 Response Receipt Acceptable <input checked="" type="checkbox"/> </div> <div> Initiator C.C. Wann </div> <div> Date 9-28-90 </div> </div> <div> <div> QA/Lead Auditor [Signature] </div> <div> Date 09-28-90 </div> </div>			
	14 Remarks:					

Page

1 of 2

CONTINUATION PAGE

8 Discussion: (continued)

although this response was accepted and closed by USGS Quality Assurance. Verification action on CAR 89-13, Rev. 1 was then marked "N/A - No Action". Therefore, CARs 89-13 and 89-13, Rev. 1 were closed out without a satisfactory verification of corrective action being performed. In addition, there was no documented justification for acceptance of the Revision 1 response without additional corrective action being specified.

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-07

Page 1 of 1

BLOCK 11 RESPONSE:

CAR-89-13, R0, did not pass verification because some of the actions were not complete. When a CAR does not pass verification, procedure requires that a new revision be issued. The reissue of CAR-89-13 as R1 was the result specifically of some original response commitments not being fulfilled as written; R1 did not indicate a significant condition adverse to quality existed.

The commitment actions that had not passed verification were re-evaluated and deemed unnecessary. Therefore, the response to the reissued CAR deleted these commitments. This response was accepted by the acting QA Manager and there were no further actions requiring verification.

YUCCA MOUNTAIN PROJECT OFFICE
YMPO OBSERVATION NO. 90-03-06N-QA-012
4/89

Completed by Originating Organization	2 Noted During: AUDIT 90-03 (USGS)	3 Identified By: J.E. CLARK	4 Date: JUNE 27, 1990
	5 Organization: USGS	6 Person(s) Contacted: J. ZIEMBA, R. LUCKEY, A. WHITESIDE, ET AL	7 Response Due Date is 20 Days from Date of Transmittal
	8 Discussion: The NCR system established in QMP-15.01, Rev. 4, is applied to both hardware and programmatic deficiencies. The dispositioning process requires assigning resolutions such as "rework," "repair," and "use-as-is," which do not help identify corrective actions necessary for programmatic deficiencies. A dedicated programmatic deficiency documentation system (possibly an adaptation of the system used for audit findings) would facilitate corrective action identification and implementation by eliminating the force-fitting of irrelevant dispositioning terms.		
Completed by Respondee	9 QAE/Lead Auditor <i>J.E. Clark</i>	Date 7/16/90	10 Branch Manager <i>William H. Hays</i>
	Date 7-17-90		
Completed by QA Org.	11 Response: See Attached Response.		
	12 Signature: <i>William H. Hays</i> Date: 8/20/90		
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>		
	Initiator <i>J.E. Clark</i>	Date 10/12/90	QA/Lead Auditor <i>William H. Hays</i> Date 10-12-90
14 Remarks:			
Page 1 of 1			

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-06

Page 1 of 1

BLOCK 11 RESPONSE:

The YMP-USGS uses NCRs to document hardware, programmatic, and data-related deficiencies for simplification (only one system). The YMP-USGS "product" is data, and the disposition of data is most important. An NCR system which just addressed hardware would have limited use on the YMP-USGS because very little "hardware" is used. The dispositioning of programmatic deficiencies is appropriate, although the interpretation of the disposition (especially rework, repair) can be confusing.

During an audit and surveillance workshop, the revision of the NCR form (to clarify and simplify the disposition process) and the NCR system will be discussed. After subsequent discussions with technical personnel, a final decision will be made on the NCR system and possible changes to it.

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-03-05

N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-03		3 Identified By: R. L. Maudlin		4 Date: 07/02/90	
	5 Organization: USGS		6 Person(s) Contacted: R. Luckey		7 Response Due Date is 20 Days from Date of Transmittal	
	8 Discussion: During the review of calibration logs maintained at several data stations at the NTS, it was observed that the logs did not, in all cases, identify the procedural revision used to perform the calibration. It is recommended that all future entries in the logs at the NTS include the procedure and procedure revision used to do the calibration.					
	9 QAE/Lead Auditor <i>[Signature]</i>		Date 07/16/90		10 Branch Manager <i>[Signature]</i> for 717-90	
Completed by Respondee	11 Response: See Attached Response.					
	12 Signature: <i>Larry R. Hays</i> Date: 8/20/90					
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>		<i>[Signature]</i> for <i>[Signature]</i> QA/Lead Auditor Date: 8/15/90			
	Initiator <i>[Signature]</i> Date: 09-28-90		<i>[Signature]</i> Date: 09-28-90			
14 Remarks:						
<div style="text-align: right;"> Page 1 of 1 </div>						

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-05

Page 1 of 1

BLOCK 11 RESPONSE:

We agree with the recommendation noted above. The QMP-12.01 does state that the procedure number and revision level will be noted. If discrepancies are noted, such as that mentioned, we are confident that using our Document Control System, we easily can determine which revision of the procedure was used.

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-03-04N-QA-012
4/89

Completed by Originating Organization	2 Noted During: Audit 90-03	3 Identified By: Bob Constable-Ken Gilkerson	4 Date: 6/29/90
	5 Organization: USGS	6 Person(s) Contacted: Tom Chaney, W. Rodman, M. Mustard	7 Response Due Date is 20 Days from Date of Transmittal
	8 Discussion: Modification to QMP 7.01, Rev. 4, dated 6/8/90 eliminated the requirements for QA records for certain "commercial grade" items. Requirements for the acceptance of "commercial grade" items not requiring calibration should be addressed to delineate the following: a) who receives "commercial grade" items not requiring calibration. b) how are these items received. c) what documentation is generated upon acceptance. d) where does this documentation go.		
	9 QAE/Lead Auditor <i>Robert B. Constable</i> Date 7/16/90	10 Branch Manager <i>Catherine Humphreys</i> Date 7-17-90	
Completed by Respondee	11 Response: See Attached Response.		
	12 Signature: <i>Larry R. Haver</i> 8/20/90 Date: 8/20/90		
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>		QA/Lead Auditor <i>Jim Mandel</i> Date 10-12-90
	Initiator <i>Jim Mandel</i> Date 10-12-90	Date 10-12-90	
14 Remarks:			
Page 1 of 2			

8 Discussion: (continued)

- e) how is it processed and sent to the LRC.
- f) how/when does USGS-QA verify the adequacy of this documentation.

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-04

Page 1 of 1

BLOCK 11 RESPONSE:

The standard USGS practice regarding receiving and acceptance of items is for the "receiver" to sign either a copy of the purchase order or the shipping slip to denote that the correct item was received undamaged.

QMP-7.01 will be changed to include this standard receiving practice, however, the QMP will not require submittal of these documents as QA records. Verification of implementation will be performed during audits and surveillances.

YUCON MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-03-03N-QA-012
4/89

Completed by Originating Organization:	2 Noted During: Audit 90-03	3 Identified By: Bob Constable, Ken Gilkerson	4 Date: 06/29/90	
	5 Organization: USGS	6 Person(s) Contacted: Martha Mustard	7 Response Due Date is 20 Days from Date of Transmittal	
	8 Discussion: QMP 4.01, Rev. 3, Par. 5.4.1, states in part that the Contracting Officer shall not award a QA Level I or II final procurement document until receipt of the review of final procurement documentation. (Attachment 3, QA & Technical Review of the Procurement Documentation.) No procedural controls exists to assure that the C.O. releases POs only after QAs documented review. USGS Surveillance 90-S05-OBS1 documents the occurrence of such an anomaly. It is recommended that USGS consider having the QA organization sign off on the PO approving that QA requirements have been met, or instituting other similar			
Completed by Respondee	9 QAE/Lead Auditor <i>Robert L. Mandt</i>	Date 07/17/90	10 Branch Manager <i>Arthur Hampton</i>	Date 7/17/90
	11 Response: See Attached Response.			
Completed by QA Org.	12 Signature: <i>Larry R. Kern</i>		Date: 8/20/90	
	13 Response Receipt Acceptable <input checked="" type="checkbox"/>		QA/Lead Auditor <i>Robert L. Mandt</i>	
	Initiator <i>Mandt</i>		Date 10-01-90	
14 Remarks:				
Page 1 of 2				

8 Discussion: (continued)
procedural controls.

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-03

Page 1 of 1

BLOCK 11 RESPONSE:

QMP-4.01 does contain procedural requirements to ensure that QA will review applicable purchase orders before their issuance. However, the date of issuance of the purchase order has not always been clear. A typed date on a purchase order reflects the dates of preparation, not the date of issuance. The contracting officer dealing with YMP purchase orders now corrects this date when the purchase order is signed. The dated signature of the contracting officer is sufficient objective evidence to indicate the purchase order issuance date.

YUCCA MOUNTAIN PROJECT OFFICE
YMPO OBSERVATION NO. 90-03-02

N-QA-012
4/89

Completed by Originating Organization:	2 Noted During: Audit 90-03		3 Identified By: R. Weeks, B. Hurley, K. Kersch		4 Date: 6/27/90	
	5 Organization: USGS		6 Person(s) Contacted: T. Chaney, R. Spengler		7 Response Due Date is 20 Days from Date of Transmittal	
	8 Discussion: YMP Administrative Procedure AP 1.10Q requires that each Study Plan contain a list of the procedures necessary to implement that Plan. It is USGS practice to include the revision number for each procedure as well. This has resulted in apparent discrepancies between the Study Plan-listed revision numbers and those found in the List of Controlled Documents at the time of comparison. The USGS should amend their existing Study Plans to list procedures without revision number and with a statement that the activity will be performed in accordance with the revision in force at the time the activity is performed.					
Completed by Respondee	9 QAE/Lead Auditor <i>Richard L. Weeks</i>		Date 7/16/90		10 Branch Manager <i>Caitlin Houghton</i>	
					Date 7-17-90	
Completed by QA Org.	11 Response: See Attached Response.					
	12 Signature: <i>Larry R. Hayes</i> 8/20/90 Date:					
Completed by QA Org.	13 Response Receipt Acceptable <input checked="" type="checkbox"/>		<i>Caitlin Houghton</i> DQA 10/17/90 Initiator Date QA/Lead Auditor Date <i>Richard L. Weeks</i> 10/11/90 <i>J. Mandlin</i> 10/11/90			
	14 Remarks:					

8 Discussion: (continued)

This approach should be adopted in future Study Plans as well.

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-02

Page 1 of 1

BLOCK 11 RESPONSE:

The USGS initiated NCR-90-26 to document discrepancies noted with the tables of technical procedures in Study Plans.

The intent of the tables in the Study Plans is to identify methodology, not delineate "current" practices. The Study Plans are planning documents intended to identify planning elements for the scientific activity. Due to the nature, complexity, and lengthy preparation time, the technical procedure tables only were intended to show the status of the procedure at the time of development of the table in the Study Plan. The controlled document system is relied upon for identification of current technical procedures available for use.

YUCCA MOUNTAIN PROJECT OFFICE
1 YMPO OBSERVATION NO. 90-03-01

N-QA-012
4/89

Completed by Originating Organization:

2 Noted During: Audit 90-03	3 Identified By: A.E. Cocoros	4 Date: 6/29/90
5 Organization: USGS	6 Person(s) Contacted: P. Warner, T. Chaney, K. Kohn	7 Response Due Date is 20 Days from Date of Transmittal
8 Discussion: The audit effort related to QMPs 2.02 & 2.07 (Indoctrination/Training of Personnel) reported that the Indoctrination/Training Program was being implemented in an acceptable manner. However, the effectiveness of the program is marginal as reported by the auditors of Criteria 3, 4, 7, 15, 16 & 17. Personnel were encountered who did not appear to fully understand the intent and application of the requirements documents. During the audit of QMPs 2.02 and 2.07, a review of the Indoctrination/Training Records of personnel performing quality-related effort, revealed that the Training/Indoctrination Program is		
9 QAE/Lead Auditor <i>[Signature]</i>	Date 7/17/90	10 Branch Manager <i>[Signature]</i>
		Date 7-17-90

Completed by Respondee

11 Response: See Attached Response.
12 Signature: <i>[Signature]</i> <i>[Signature]</i>
Date: 8/20/90 8/20/90

Completed by QA Org.

13 Response Receipt Acceptable <input checked="" type="checkbox"/> *	<i>[Signature]</i> <i>[Signature]</i>
Initiator <i>[Signature]</i>	QA/Lead Auditor <i>[Signature]</i>
Date 10-12-90	Date 10-12-90
14 Remarks: * Your responses appear to indicate a misunderstanding of the observation. The intent of the observation was to point out apparent weaknesses in your existing training program, not training needs to resolve SQA's. This is being closed based on future audits of the effectiveness of your training. It is felt that if changes in your approach do not change, deficiencies will occur.	

Page

1 of 2

8 Discussion: (continued)

directed predominately toward "required reading" type of effort as opposed to a formal classroom effort.

Since a "required reading" approach tends to only familiarize personnel with procedural steps rather than facilitating a complete understanding of the application of the procedure, it is recommended that USGS give strong consideration to conducting formal classroom Training/Indoctrination Programs for all personnel who are required to understand and implement specific requirements documents.

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-01

Page 1 of 2

BLOCK 11 RESPONSE:

The YMP-USGS reading assignments are made when management determines that personnel must be advised of changes and formal classroom instruction is not required. Formal classroom instruction has been used, and will continue to be used when deemed appropriate by management.

The SDRs and Observations from this audit and the USGS responses have been re-evaluated concerning "training" effectiveness as summarized below:

Criterion 3 None of the three SDRs or one Observation indicate a serious generic deficiency in the control of scientific investigations as a direct result of ineffective training. The investigative phase for the SDR involving criteria letters is still underway. To date, none of the deficiency documents warrant in-depth instruction as a preventive measure.

Criteria 4 & 7 There were no SDRs initiated for these criteria and two Observations concerning the actual issue date for purchase orders and required documentation for receipt of commercial-grade items. Neither of these findings indicate a serious deficiency or a lack of understanding of the responsible personnel involved.

Criterion 15 One SDR involved NCR deficiencies and questions with the NCR processing phases (initiation, disposition, verification). No deficiencies were noted concerning the actual nonconforming conditions or disposition actions taken to correct the deficient conditions. The Observation questions the workability of the USGS NCR system, not the deficient conditions noted in the NCRs. The investigative phase for the SDR is still underway to determine the cause and preventive actions. To date, none of the corrective actions appear to warrant in-depth instruction as a preventive measure.

Criterion 16 The SDR was initiated due to interpretation of when a CAR was to be written during the trending program. This deficiency does not indicate a lack of knowledge and the corrective action focuses on clarifying the procedure to reflect the actual practice. Three Observations were initiated concerning specific questions with three USGS CARs. None of the responses indicated a need for instruction.

USGS RESPONSE TO YMPO OBSERVATION NO. 90-03-01

Page 2 of 2

BLOCK 11 RESPONSE continued:

Criterion 17 The three SDRs and one Observation initiated involved record source and LRC responsibilities and practices. Many of the problems noted in the SDRs were attributable to ambiguities and inconsistencies within the QMP, and after revising the QMP, classroom training and reading assignments will be made as deemed necessary.

A recent letter from DOE noted that the LRC had maintained a 99.148% accuracy rate for records submitted to the CRF from 4/1 - 6/30/90 which indicates that implementation of record processing to the CRF has been effective.

An individual's knowledge of a procedure or process is based upon experience (use), not just classroom instruction or reading assignments. Until the level of activity increases within our YMP-USGS program, we expect USGS personnel to be familiar with the procedures and know where to locate them for reference during "work". We will continue to use reading assignments to familiarize personnel with current requirements, and we will emphasize formal classroom training to assure key personnel understand and are ready to implement the requirements of a procedure.