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

WBS 1.2.9.3
QA

DEC 11 1990

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 RESPONSES TO STANDARD DEFICIENCY REPORTS (SDRS) 554 THROUGH 559, 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 responses to SDRs 554 through 559, Revision 0, generated as a result of the Yucca Mountain Site Characterization Project Office Quality Assurance Audit 90-03 of USGS. The SDRs will be closed after verification of satisfactory completion of the specified corrective actions. Copies of the SDRs are 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.

If you have any questions, please contact either Catherine E. Hampton at (702) 794-7973 or FTS 544-7973, or Richard L. Maudlin at (702) 794-7290 or FTS 544-7290 of the YMQAD staff.

Donald G. Horton, Director
Yucca Mountain Quality Assurance Division

YMQAD:CEH-1117

Enclosures:
SDRs 554 thru 559, Revision 0

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

9012200052 901211
PDR WASTE
WM-11 PDR

102.7
WM-11
NH03

ORIGINAL
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YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization

1 Date 6-28-90 | 2 Severity Level ☐ 1 ☐ 2 ☒ 3 | Page 1 of 2

3 Discovered During: YMP-90-03

3a Identified By: R. Weeks and M. Meyer

4 SDR No. 554 Rev. 0

5 Organization: USGS

6 Person(s) Contacted: Peggy Warner

7 Response Due Date is 20 Working Days from Date of Transmittal

8 Requirement (Audit Checklist Reference, if Applicable)
SCP Management Plan, Revision 2, Paragraph 6.3 states in part,"The participating organization will submit clean, typed initial draft text that is consistent with the required format (Section 3.4) to the

9 Deficiency
Although Study Plan 8.3.1.4.2.2 was issued in February 1989, the following conflicts had not been corrected using the Study Plan change process provided in the SCP Management Plan, Revision 2:

10 Recommended Action(s): ☒ Remedial ☐ Investigative ☐ Corrective

Aprvl.

11 QAE/Lead Auditor/Date	12 Division Manager/Date	13 Project Quality Mgr./Date
Richard L. Weeks 7/17/90	N/A	Cathy Langford 7-17-90

Completed by Organization in Block 5

14 Remedial/Investigative Action(s)

15 Effective Date _____

See Attached Response.

16 Cause of the Condition & Corrective Action to Prevent Recurrence

17 Effective Date _____

18 Signature/Date
Larry R. Hayes 8/20/90

Comp. by Orig. QA Org.

	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date
19 Response Accepted	Richard L. Weeks 11/12/90	N/A	Cathy Langford 11/12/90
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 10/16/90 - Hayes to Horton - Accepted 11/6/90 - QA:CEH-684
Request Response Extension 10/29/90 - Hayes to Horton - Accepted 11/7/90 - QA:CEH-723
Amended Response 11/9/90 - Hayes to Horton

22 QA CLOSURE	QAE/Lead Auditor/Date	Division Manager/Date	PQM/Date

ENCLOSURE

8 Requirement (continued)

WMPO for review..."

SCP Management Plan, Revision 2, Paragraph 3.4 states in part, "Programatic guidance relative to the content requirements and level of detail for Study Plans was developed by and received concurrence from the DOE and the NRC in the May 7-8, 1986, SCP level-of-detail meeting (see Appendix A)."

9 Deficiency (continued)

1) Paragraph 3.1.1 (p. 3.1-2) states that transferring geologic data from photos to base maps is a QA Level III work; Appendix A (p. A-5) states that this work is QA Level I.

2) Study Plan 8.3.1.4.2.2 was sent to DOE on 12-20-88 (see letter Langer to Gertz) with reference to obsolete Technical Procedure GP-01, Revision 0 although, GP-01, Revision 1 had been issued on 11-8-88. Examples of references to GP-01, Revision 0, which was obsolete at the time Study Plan 8.3.1.4.2.2 was issued, are as follows:

   - Paragraph 2.1 (p.2.1-1)
   - Paragraph 3.4.3 (p. 3.4-5)
   - Table 3.1-1 (p. T-17)

3) Table 3.2-1 (p. T-18) requires compliance with both Revisions 0 and 1 of Technical Procedure GP-12. Table 3.2-1 also indicates that the date of issue for both revisions of this procedure is 3-6-83.

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

The SCP Management Plan is not a quality assurance requirement document.

The anomalies cited in this SDR will not adversely affect technical work that may be undertaken. No commitments for remedial actions under the QA program are warranted. As study plans are revised in the future, they will meet the needs of the requirements in effect.

BLOCK 15: EFFECTIVE DATE: Not applicable.

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

Not applicable for Level 3 SDR.

BLOCK 17: EFFECTIVE DATE: Not applicable for Level 3 SDR.

USGS AMENDED RESPONSE TO YMPO SDR 554
Page 1 of 1

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

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

Study Plans are DOE/YMP documents. Because the SCP Management Plan is not part of the YMP-USGS "qualified QA Program" requirements, the USGS can not correct the anomalies cited in SDR 554 per the SCP Management Plan.

The USGS must initiate revision of approved Study Plans per AP-1.10Q, R2. AP-1.10Q, R2 directs the USGS PI or TPO to:

- Identify need for revision of a Study Plan.
- Transmit request that identifies nature of revision and reasons for making revision to RSED Director.
- If there is an immediate need to make a change prior to the approval of a full revision of the Study Plan, the request is made in the form of an ICN.

The USGS has determined that there is no immediate need to make a change prior to the approval of a full revision of the Study Plan; therefore, an ICN is not required. The USGS will notify the RSED Director of the needed corrections to Study Plan 8.3.1.4.2.2.

BLOCK 15: EFFECTIVE DATE: November 19, 1990

Ltr dtd 11/8/90 - Hayes to Horton

BLOCK 18: SIGNATURE/DATE: Larry R. Hayes 11/06/90

ORIGINAL
THIS IS A RED STAMP

YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization

1 Date JUNE 29, 1990 | 2 Severity Level ☐ 1 ☒ 2 ☐ 3 | Page 1 of 3

3 Discovered During: AUDIT 90-03

3a Identified By: DENNIS BROWN/ JAMES E. CLARK

4 SDR No. 555 Rev. 0

5 Organization: USGS

6 Person(s) Contacted: J. ZIEMBA, M. MUSTARD

7 Response Due Date is 20 Working Days from Date of Transmittal

8 Requirement (Audit Checklist Reference, if Applicable)

USGS-QMP-15.01, Rev. 4, states in part:

9 Deficiency

NCRs are not being processed in accordance with procedural requirements. A sampling of NCRs revealed procedural noncompliances in four of seven: NCRs 89-24, 89-26, 89-30, and 90-02.

10 Recommended Action(s): ☒ Remedial ☒ Investigative ☒ Corrective

Aprvl.

11 QAE/Lead Auditor/Date	12 Division Manager/Date	13 Project Quality Mgr./Date
J E Clark 7/16/90	N/A	7-17-90

Completed by Organization in Block 5

14 Remedial/Investigative Action(s)

15 Effective Date _____

See Attached Response.

16 Cause of the Condition & Corrective Action to Prevent Recurrence

17 Effective Date _____

18 Signature/Date 8/20/90

Comp. by Orig. QA Org.

	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date
19 Response Accepted	J E Clark 11/16/90	N/A	11/20/90
20 Corrective Action Verif. Satisfactory			

21 Remarks

Response, Hayes to Horton, 8-20-90
Request Amended Response 10/5/90 - QA:CEH-133
Request Response Extension 10/16/90 - Hayes to Horton - Accepted 10/6/90 - QA:CEH-684
Request Response Extension 10/29/90 - Hayes to Horton - Accepted 11/1/90 - QA:CEH-723
Amended Response 11/2/90 - Hayes to Horton

22 QA CLOSURE	QAE/Lead Auditor/Date	Division Manager/Date	PQM/Date

8 Requirement (continued)

Para. 5.5.3 When the methods specified in Para. 5.5.1 and 5.5.2 are not necessary, the assigned personnel shall assure that the documented condition is adequately identified and described and shall propose a disposition.

Para. 5.5.3a ... The proposed disposition actions have been categorized, such as repair, rework, ...

Para. 5.5.3c ... The cause and, if appropriate, action(s) to preclude recurrence, have been described ...

Para. 5.5.4 The NCR shall be forwarded to the cognizant personnel or office for review and approval of the proposed disposition.

Para. 5.5.5 The NCR is next forwarded to the QA office for review and approval which shall ensure that appropriate QA requirements have been included. The QA Manager or delegate shall ensure that the information identified in Para. 5.5.3 has been included or considered in the disposition.

Para. 5.6.3 Upon completion of the disposition actions, the responsible personnel shall sign and date Part III of the NCR, then notify the QA office of action completion.

Para. 5.7.3 If verification of the disposition and related records is acceptable, the QA Manager or delegate shall sign and date Part IV of the NCR ...

Para. 5.1.5 ... If the condition or item is not out of conformance, the NCR shall be voided and the initiator of the NCR shall be informed of the basis for the voidance.

9 Deficiency (continued)

89-24 - Corrective action to prevent recurrence not addressed

89-26 - Two different dispositions indicated
Disposition action not signed as required
Corrective action to prevent recurrence not addressed

89-30 - Disposition not referenced on NCR
Disposition not approved by supervisor
Disposition not approved by QA
Disposition action not signed as completed
Verification action completed and accepted, but NCR not closed
NCR was voided; the reason was not clear or correct

9 Deficiency (continued)

90-02 - Disposition block not marked
Disposition action not approved as completed

USGS RESPONSE TO YMPO STANDARD DEFICIENCY REPORT (SDR) NO. 555
Page 1 of 1

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

An investigation of the cited discrepancies revealed the following:

There is no remedial action necessary for NCR-89-24:

- o Actions to prevent recurrence are required only as applicable.

There is no remedial action necessary for NCR-89-26:

- o Two disposition actions are allowed in the QA program (rework for the calibration, use-as-is for the data).
- o The disposition action complete line was not signed because the actions were complete upon submittal of the proposed disposition.
- o Actions to prevent recurrence are required only as applicable.

There is no remedial action necessary for NCR-89-30:

- o Disposition is required to be sent to the cognizant office for approval. In this case, the dispositioner was a direct representative of the Geologic Division and therefore the NCR required no further approvals before submittal to the QA Office.
- o Disposition approval by the QA Office and the lack of signature on the disposition action complete line are irrelevant because the NCR was voided.
- o The distribution letter for the voided NCR included an explanation that the previously distributed verification was in error.
- o There is a justification for the voiding attached to the NCR.

There is no remedial action necessary for NCR-90-02:

- o Part II of the NCR already noted that the equipment had been scrapped.
- o The disposition action complete line was filled in upon verbal notification. No further action is warranted.

An investigation of other NCRs is under way to determine the scope/extent of similar discrepancies. The results of this investigation will be outlined in a Supplemental Response.

BLOCK 15: EFFECTIVE DATE: August 30, 1990 - Supplemental Response

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

The cause and preventive action will be determined based upon the results of the investigation, and will be outlined in a supplemental response.

BLOCK 17: EFFECTIVE DATE: August 30, 1990 - Supplemental Response.

USGS SUPPLEMENTAL RESPONSE
TO YMPO STANDARD DEFICIENCY REPORT (SDR) NO. 555

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

A review of records packages for USGS nonconformance report revealed several cases in which the "disposition action complete line" was not signed or was left blank. There is no effect on quality and no remedial actions are considered necessary. Multiple dispositions and dispositions without preventive actions were noted in other NCRs and were considered satisfactory based on QMP requirements.

BLOCK 15: EFFECTIVE DATE: Not applicable

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

The "disposition action complete" lines on USGS nonconformance reports have not consistently been signed and dated because the requirement's intent and the need for signature were not clear. There is no requirement for an action-complete-signature-line in the YMP-USGS Quality Assurance Program Plan. This requirement will be deleted from QMP-15.01.

BLOCK 17: EFFECTIVE DATE:

October 1, 1990

BLOCK 18: David H. Appel 8/30/90
David H. Appel, Quality Assurance Manager Date

Ltr dtd 8/30/90 - Hayes to Horton

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

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

An investigation of the cited deficiencies revealed the following:

NCR-89-24:

QMP-15.01 requires actions to prevent recurrence to be identified in an NCR response only as applicable. This NCR dealt with an equipment failure. Actions to prevent recurrence were not considered applicable.

No remedial actions are necessary for the NCR-89-24 record package.

NCR-89-26:

Two dispositions are allowed in the QA program (rework for the calibration, use-as-is for the data).

The disposition action complete line on the NCR will be annotated "complete upon disposition submittal" and the NCR form will be resubmitted as a record cross-indexed with the NCR-89-26 package.

QMP-15.01 requires actions to prevent recurrence to be identified in an NCR response only as applicable. This NCR dealt with an equipment failure. Actions to prevent recurrence were not considered applicable.

NCR-89-30:

Disposition is required to be sent to the cognizant office for approval. In this case, the dispositioner was a direct representative of the Geologic Division and therefore the NCR required no further approvals before submittal to the QA Office.

Lack of signature on the disposition action complete line occurred because the proposed disposition was never approved and the NCR was subsequently voided. The distribution letter for the voided NCR included an explanation that the previously distributed verification was in error. There is a justification for the voiding attached to the NCR.

No remedial actions are necessary for the NCR-89-30 record package.

Ltr dtd 11/8/90 - Hayes to Hatton

NCR-90-02:

The disposition block was not marked because Part II of the NCR had already noted that the equipment had been scrapped. The block will be checked and the NCR form resubmitted as a record cross-indexed with the NCR-90-02 record package.

The "disposition action complete" line was filled in upon verbal notification.

A review of records packages for USGS nonconformance reports revealed several cases in which the "disposition action complete" line was left blank. These NCRs will be annotated "see SDR-555" and resubmitted as individual records cross-indexed to the appropriate record package. Multiple dispositions and dispositions without actions to prevent recurrence were also noted in other NCRs and were considered satisfactory based on QMP requirements.

BLOCK 15: EFFECTIVE DATE: December 31, 1990

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

The "disposition action complete" lines on USGS nonconformance reports have not consistently been signed and dated because the requirement's intent and the need for signature were not clear. There is no requirement for an action-completion-signature line in the YMP-USGS Quality Assurance Program Plan. This requirement will be deleted from the QMP.

QMP-15.01 will be changed to provide more guidance in regard to the appropriateness of actions to preclude recurrence in NCR dispositions.

BLOCK 17: EFFECTIVE DATE: December 31, 1990

BLOCK 18: SIGNATURE/DATE: [illegible] 11/8/90

ORIGINAL
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YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization

1 Date June 28, 1990 | 2 Severity Level ☐ 1 ☒ 2 ☐ 3 | Page 1 of 2

3 Discovered During: Audit 90-03

3a Identified By: James E. Clark

4 SDR No. 556 Rev. ____

5 Organization: USGS

6 Person(s) Contacted: Jim Ziemba

7 Response Due Date is 20 Working Days from Date of Transmittal

8 Requirement (Audit Checklist Reference, if Applicable)

QMP-16.01, Revs. 2 & 3 Section 1 states that the procedure is to establish a system for identifying, determining the cause and providing corrective action

9 Deficiency

Contrary to the requirements cited, on at least three occasions Corrective Action Reports (CARs) were not initiated to document recurring conditions adverse to quality, or potentially adverse to quality, identified in the

10 Recommended Action(s): ☒ Remedial ☒ Investigative ☒ Corrective

Aprvl.

11 QAE/Lead Auditor/Date: JEClark 7/16/90

12 Division Manager/Date: N/A

13 Project Quality Mgr./Date: Catherine Hampton 7-17-90

Completed by Organization in Block 5

14 Remedial/Investigative Action(s)

15 Effective Date ____

See Attached Response.

16 Cause of the Condition & Corrective Action to Prevent Recurrence

17 Effective Date ____

18 Signature/Date: [illegible] 8/20/90

Comp. by Orig. QA Org.

19 Response Accepted	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date
	JEClark 11/16/90	N/A	Catherine Hampton 11/20/90
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 10/16/90 - Hayes to Horton - Accepted 11/6/90 - QA:CEH-684
Request Response Extension 10/29/90 - Hayes to Horton - Accepted 11/7/90 - QA:CEH-723
Amended Response 11/8/90 - Hayes to Horton

22 QA CLOSURE	QAE/Lead Auditor/Date	Division Manager/Date	PQM/Date

8 Requirement (continued)

for significant or recurring conditions adverse to quality or potentially adverse to quality, that include but are not limited to a breakdown of the USGS QA program and repetitive nonconformances.

QMP-16.01, Revs 2 & 3 Section 5.1.1 states in part "Any USGS personnel or USGS contractor personnel that observe a condition adverse to quality or potentially adverse to quality, are responsible for initiating a Corrective Action Report (CAR) and for notifying immediate and upper levels of management of the adverse condition."

9 Deficiency (continued)

September and November 1989 Trend Analysis Reports, and the March 1990 Trend Analysis Report.

USGS RESPONSE TO YMPO STANDARD DEFICIENCY REPORT (SDR) NO. 556

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

No remedial or investigative actions are warranted.

BLOCK 15: EFFECTIVE DATE: Not applicable.

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

When the USGS initiated the trend analysis program through QMP-16.03, the effect on implementation of QMP-16.01 was not realized. The intent was to identify trends and potential trends within the scope of QMP-16.03. A CAR would be initiated through QMP-16.01 only when a trend adverse to quality was identified which required management action.

QMP-16.01 will be changed to reflect the actual practice.

BLOCK 17: EFFECTIVE DATE: October 1, 1990 - Change QMP-16.01.

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

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

The conditions identified as potential adverse trends in the September 1989 and March 1990 Trend Analysis Reports were investigated. Issuance of a CAR was not warranted because they do not involve recurring conditions. However, the deficiencies cited in the November 1989 (and later the July 1990) Trend Analysis Reports were indeed recurring conditions, and USGS-CAR-90-02 was initiated.

BLOCK 15: EFFECTIVE DATE:

USGS-CAR-90-02 was originated on September 6, 1990.

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

There is a disconnect between the requirements in QMP-16.01 and 16.03:

> QMP-16.01, Corrective Action Reports, currently requires a CAR to be originated if there is a significant or recurring condition adverse to quality or potentially adverse to quality, whereas QMP-16.03, Trend Analysis, requires identification of both trends and potential trends, however it only requires a CAR to be originated if a condition adverse to quality exists.

The wording of QMP-16.01, Control of Corrective Action Reports, will be changed to allow the investigation of conditions potentially adverse to quality or recurring conditions potentially adverse to quality without the initiation of a CAR until the condition is determined to be significant and/or adverse to quality.

Additionally, QMP-16.03 will be changed to reflect the required documentation and evaluation process for potentially adverse trends and potentially adverse recurring conditions identified during Trend Analysis.

Intrinsic to these QMP changes will be a clearer distinction among the terms involved, such as recurring condition, significant condition adverse to quality, potentially adverse trend, potential trend, and potentially adverse to quality.

Ltr dtd 11/8/90 - Hayes to Horton

BLOCK 17: EFFECTIVE DATE:

February 28, 1991 - Changes to QMP-16.01 and QMP-16.03 effective.

BLOCK 18: SIGNATURE/DATE: 11/8/90

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YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization

1 Date 06/28/90 | 2 Severity Level ☐ 1 ☒ 2 ☐ 3 | Page 1 of 3

3 Discovered During: AUDIT 90-03

3a Identified By: C.C. Warren

4 SDR No. 557 Rev. 0

5 Organization: USGS

6 Person(s) Contacted: P. Warner

7 Response Due Date is 20 Working Days from Date of Transmittal

8 Requirement (Audit Checklist Reference, if Applicable)
YMP-USGS-QMP 17.01, Rev. 3 identifies the following requirements for record source:

9 Deficiency
Contrary to the above requirements, a sample of 10 record packages from the LRC indicated the following:

10 Recommended Action(s): ☒ Remedial ☒ Investigative ☒ Corrective
Identify the remedial action to be taken to correct the deficiencies noted in Block 9. Investigate the program, process, activities, or documentation

Aprvl.

11 QAE/Lead Auditor/Date: C.C. Warren / 7-16-90

12 Division Manager/Date: N/A

13 Project Quality Mgr./Date: 7-17-90

Completed by Organization in Block 5

14 Remedial/Investigative Action(s)

15 Effective Date

See Attached Response.

16 Cause of the Condition & Corrective Action to Prevent Recurrence

17 Effective Date

18 Signature/Date: Larry R. Hayes 8/20/90 8/20/90

Comp. by Orig. QA Org.

19 Response Accepted	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date
	C.C. Warren / 11-14-90	N/A	Arthur Hampton for 11/20/90
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 10/16/90 - Hayes to Horton - Accepted 10/16/90 - QA:CEH-684
Request Response Extension 10/29/90 - Hayes to Horton - Accepted 11/7/90 - QA:CEH-723
Amended Response 11/15/90 - Hayes to Horton

22 QA CLOSURE	QAE/Lead Auditor/Date	Division Manager/Date	PQM/Date

8 Requirement (continued)

A. 5.1.4 INDEXING PARAMETERS: The Record Source shall ensure that the following indexing parameters for each Project record are available on the record prior to submittal to the LRC:

- o QA designation for correspondence (for QA Level I and II records designate "QA: QA" or for QA Level III, N/A or IND records designate "QA: N/A").
- o QA designation for packages ("QA levels I, II, III, N/A, or IND").
- o The Work Breakdown Structure (WBS) designation (through six digits when appropriate and separated by decimal points) of the subject of all QA records with periods.

B. 5.1.7 RECORD INSPECTION: The Records Source responsible for submitting the record (QA and/or non-QA) to the LRC shall inspect the record(s) prior to submittal to ensure the following:

5.1.7.1 Completeness - That all pages of the record, including attachments or enclosures, are accounted for and that all blocks on forms (including signature lines) are filled in or "N/A" (not applicable) is entered.

5.1.7.2 Copy Suitability - That written/typed records are legible, reproducible, and can be microfilmed in accordance with the standards for processing and microfilming outlined in Attachment 5 of this procedure and the following:

c. Records shall not have any information scratched out or obliterated by correction fluids, etc., or have extraneous information handwritten on the record (with the exception of corrections made in accordance with Para. 5.1.8 of this procedure). If new information has been added to a record previously submitted to the LRC, it constitutes a new and separate record.

d. No portion of any page shall be missing due to tearing or folding of the record edges nor, to the extent feasible, nor shall it contain stamps or other marks that obliterate text or other information.

C. 5.1.8 CORRECTIONS TO RECORDS: The Record Source may make corrections to completed written/typed records that have not been processed. Corrections shall be made by scribing a single line through the incorrect information using indelible black ink and entering the correct information in close proximity to the line-out. The incorrect information shall remain legible. The correction shall include the date and initials or signature of the Record Source making the correction. Erasures or correction fluid of any type shall not be used as a means of

8 Requirement (continued)

correcting information on records.

D. 5.1.9.1 General Requirments - The following requirements apply to submittal of all Packages.

- o Prepare a Table of Contents for each package that lists all records that are contained in the package. In the upper right corner of the first page, list the WBS number under which the Record Source activities are governed and the QA Level corresponding to the subject activity.

E. 5.2.1 TRANSMITTAL TO THE LRC: Records shall be forwarded to the LRC no later than 10 working days after either the completion date shown on the record, the date the Record Source receives the published manuscript, or after closeout of a record package (packages require a transmittal form - see Attachment 6). Correspondence is submitted directly to the LRC on an ongoing basis within 10 days of receipt or completion. YMP Records prepared by non-USGS Project departments.

9 Deficiency (continued)

A. Five of the Record Packages contained records that did not indicate all required Indexing Parameters. Missing parameters included QA Designation/Level and WBS Designation.

B. & C. One of the Record Packages contained a record with extensive use of correction fluid (in excess of 20 instances)

D. The Table of Contents for six of the Record Packages did not list all records that were contained in the Package.

E. Five of the Record Packages were not forwarded to the LRC within 10 working days after the completion date shown on the record.

The following Record Packages were reviewed:

NCR Package 89-26	Study Plan 8.3.1.2.1.3
NCR Package 89-30	Audit Package EA 90-02
NCR Package 90-02	Audit Package USGS 89-03
CAR Package 89-13	Surveillance Package 90-S05
Study Plan 8.3.1.4.2.2	Surveillance Package 90-S17

10 Recommended Actions (continued)

to determine the extent and depth of similar deficient conditions listed as examples on the SDR. Identify the cause of the condition and the planned action to prevent recurrence.

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

An investigation of the cited deficiencies revealed the following:

A. INDEXING PARAMETERS: The Table of Contents for each record package does include the appropriate indexing parameters. Each document within the package does not need to include the indexing parameters. No correction is required for the individual records.

B,C. RECORD CORRECTIONS: This discrepancy appears to be limited to the document mentioned. The LRC maintained the original document for information, but had, in fact, processed a legible copy to the CRF as the official project record. No additional actions are warranted.

D. TABLE OF CONTENTS: For any record packages already submitted and accepted by CRF, the Table of Contents will not be corrected. The Table of Contents within record packages at LRC are being reviewed. When correction is needed, LRC personnel will work closely with record sources as part of the actions associated with SDR 558.

E. RECORD SUBMITTALS TO LRC: No remedial actions can be taken.

BLOCK 15: EFFECTIVE DATE: Not applicable. (Actions for Item D are part of SDR 558.)

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

Causes:

A,D. The terminology and instructions included in QMP-17.01 R3 were not clear regarding the preparation and acceptance requirements for record packages.

B,C,E. Record Sources required more instruction regarding implementation details of the QMP.

Preventive Actions:

QMP-17.01, R4 is in process and will include clearer directions for Record Sources. The QMP will clarify instructions regarding indexing parameters, table of contents, records corrections, etc. Overall, the terminology and instruction will be clarified to promote a better understanding of the requirements.

After QMP-17.01, R4 is approved, instruction of personnel will begin. This instruction will include classroom sessions for key personnel, with reading assignments for other personnel as deemed appropriate.

Also, as noted in the SDR 558, the LRC activities to implement the new QMP and to return records for correction will increase Records Source awareness of the QMP-17.01 requirements.

BLOCK 17: EFFECTIVE DATE:

September 14, 1990	-	QMP-17.01 approval.
December 3, 1990	-	QMP-17.01, R4 instruction for key personnel.

USGS AMENDED RESPONSE TO YMPO SDR 557
Page 1 of 2

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

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

An investigation of the cited deficiencies revealed the following:

A. INDEXING PARAMETERS: QMP-17.01, R3, was prepared to identify records as individual records which have specific indexing requirements that must be included on the records prior to submitting the records to the CRF. Records packages have requirements for indexing information to be on the Table of Contents for the complete records package (not on each individual document within the records package). The Table of Contents for each record package does include the appropriate indexing parameters. Each document within the package does not need to include the indexing parameters. No correction is required for the cited records packages.

B,C. RECORDS CORRECTION: This discrepancy appears to be limited to the document mentioned. The LRC maintained the original document for information, but had, in fact, processed a legible copy to the CRF as the official project record. No additional actions are warranted.

D. TABLE OF CONTENTS: For any record packages already submitted and accepted by the CRF, the Table of Contents will not be corrected. The Table of Contents within record package at the LRC are being reviewed. When corrective action is needed, the LRC personnel will work closely with record sources as part of the actions associated with SDR 558.

E. RECORD SUBMITTALS TO LRC: No remedial actions can be taken.

BLOCK 15: EFFECTIVE DATE: Not applicable.

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

Causes:

A,D. The terminology and instructions included in QMP-17.01, R3 were not clear regarding the preparation and acceptance requirements for record packages.

B,C,E. Record sources did not properly implement the procedure.

Ltr dtd 11/8/90 - Hayes to Horton

Preventive Actions:

QMP-17.01,R4 is approved and includes clearer directions for Record Sources. The QMP clarifies instructions regarding indexing parameters, table of contents, records corrections, etc. Overall, the terminology and instruction is clarified to promote a better understanding of the requirements.

QMP-17.01, R4 was issued as a reading assignment on September 14, 1990. Instruction will also include classroom sessions for key personnel as deemed appropriate. This classroom instruction will stress compliance with records requirements as stated in QMP-17.01, R4.

Also, as noted in SDR 558 response, the LRC activities to implement QMP-17.03 and to return records for correction will increase Record Source awareness of the QMP-17.01 requirements.

BLOCK 17: EFFECTIVE DATE:

September 24, 1990 - QMP-17.01, R4 became effective
November 5, 1990 - QMP-17.03, R0 becomes effective
December 3, 1990 - instruction in QMP-17.01, R4 for key personnel

BLOCK 18: SIGNATURE/DATE: Daryl L. Hess Alan T. Eppel 11/06/90

ORIGINAL
THIS IS A RED STAMP

YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization

1 Date 06/29/90 | 2 Severity Level ☐ 1 ☒ 2 ☐ 3 | Page 1 of 3

3 Discovered During: AUDIT 90-03

3a Identified By: D. Brown, C. Warren

4 SDR No. 558 Rev. 0

5 Organization: USGS

6 Person(s) Contacted: P. Warner

7 Response Due Date is 20 Working Days from Date of Transmittal

8 Requirement (Audit Checklist Reference, if Applicable)
YMP-USGS-QMP 17.01, Rev. 3,

Para. 5.3.3 states, "The LRC shall verify that all Records listed within the

9 Deficiency
Contrary to the above, the LRC was not adequately performing quality verification of QA Record Packages. The following deficient conditions were identified:

10 Recommended Action(s): ☒ Remedial ☒ Investigative ☒ Corrective

Identify the remedial action to be taken to correct the deficiencies noted in Block 9. Investigate the program, process, activities, or documentation

Aprvl.

11 QAE/Lead Auditor/Date: C C Warren / 7-16-90

12 Division Manager/Date: N/A

13 Project Quality Mgr./Date: Cathy Humphrey for 7-17-90

Remedial/Investigative Action(s)

15 Effective Date _____

See Attached Response.

Completed by Organization

16 Cause of the Condition & Corrective Action to Prevent Recurrence

17 Effective Date _____

18 Signature/Date: Larry R. Hayes 8/20/90

Comp. by Orig. QA Org.

	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date
19 Response Accepted	C.C Warren / 11-14-90	N/A	Cathy Humphrey for
20 Corrective Action Verif. Satisfactory			

21 Remarks
Response, Hayes to Horton, 8-20-90
Request amended Response 10/5/90 - QA:CEH-133
Request Response Extension 10/16/90 - Hayes to Horton - Accepted 11/6/90 - QA:CEH-684
Request Response Extension 10/29/90 - Hayes to Horton - Accepted 11/7/90 - QA:CEH-723
Amended Response 11/9/90 - Hayes to Horton

22 QA CLOSURE	QAE/Lead Auditor/Date	Division Manager/Date	PQM/Date

8 Requirement (continued)

Table of Contents to a Record Package are within that Record Package."

Para. 5.3.4 states, "The LRC shall check the Records which are being received by using the Quality Verification Checklist (Attachment 4)."

Para. 5.4 states, "The LRC shall transmit the completed Records to the CRF within 10 working days of receipt from the Record Source."

9 Deficiency (continued)

a. QA Levels (I, II, III, N/A, or IND) were not indicated on QA Record Packages (listed on the Table of Contents). (2 out of 10 packages sampled were deficient).

b. QA designations (QA or N/A) were not indicated on individual QA Records. (5 out of 10 packages sampled were deficient).

c. Individual QA Records either have no WBS number or have conflicting WBS (5 out of 10 packages sampled were deficient).

d. Attachments and enclosures to individual QA Records are not being accounted for prior to submittal to CRF. (One out of 10 packages sampled were deficient).

e. The Table of Contents does not list all individual QA Records in QA Record Packages. (6 out of 10 packages sampled were deficient).

f. Aerial photographs indicated by the Table of Contents for Package GS.89.M00022 were missing from the Package. These photos are one of a kind records. (This package was removed by others on the Audit Team)

The Audit Team sampled approximately 1% of all LRC QA Record Packages. Reviewed Record Packages include:

NCR Package 89-26	CAR Package 89-13
NCR Package 89-30	Audit Package EA 90-02
NCR Package 90-02	Audit Package USGS 89-03
Study Plan 8.3.1.4.2.2	Surveillance Package 90-S05
Study Plan 8.3.1.2.1.3;	Surveillance Package 90-S17

NOTE: Prior to 08/21/89, LRC was required to complete and sign the Quality Verification Checklist. The 08/21/89 modification to QMP-17.01 caused the checklist to be used as only a guide. The checklist covers many items addressed in this SDR.

10 Recommended Actions (continued)

to determine the extent and depth of similar deficient conditions listed as examples on the SDR. Identify the cause of the condition and the planned

10 Recommended Actions (continued)

action to prevent recurrence.

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

An investigation of the cited deficiencies revealed the following:

a, b, c. INDEXING PARAMETERS: The Table of Contents for a records package includes the WBS# and the QA designation. Each document within the package does not need to show that same WBS# or QA designation. No corrections are required for the individual documents and the packages will be processed according to the parameters specified on the Table of Contents.

d. COMPLETE PACKAGES: Individual documents, especially correspondence, within a records package may appear to not have attachments/enclosures. However, those documents (attachments, enclosures, etc.) are an integral part of the package already, and to avoid redundancy or duplication, those documents would not necessarily be physically attached or enclosed with a particular piece of correspondence. No remedial actions are warranted.

e. TABLE OF CONTENTS: For any record packages already submitted and accepted by CRF, the Table of Contents will not be corrected. The Table of Contents within record packages at LRC are being reviewed by LRC personnel. When correction is needed, LRC personnel will work closely with Record Sources to assure Table of Contents reflect the actual contents of the records package.

f. ILLEGIBLE COPIES: The cited package (GS.89.M00022) was prepared and processed as part for the DOE Litigation Discovery materials. Aerial photographs were noted as not included in the package. A special instruction sheet is part of the package showing these as "one-of-a-kind" records. This sheet explains that the original photographs were still being used and were with the investigator at a specified (office) location.

A copy of the photographs was made for package GS.89.M00025 (cited in SDR 559). Other record packages that would eventually need to include the photographs or a reference to them, will use a special instruction sheet showing the location of the original photographs. This avoids duplication of materials and provides needed cross-referencing.

No remedial actions are warranted.

BLOCK 15: EFFECTIVE DATE: September 14, 1990 - Item e - Corrections.

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

Cause(s):

a, b, c, d, e. The terminology and instructions included in QMP-17.02, R3 were not clear regarding the preparation and acceptance requirements for record packages.

f. The role and requirements for Litigation/Discovery Records as part of the records management system was not clearly explained.

BLOCK 16 CONTINUED:

Preventive Action(s):

QMP-17.01, R4 is in process and will include clearer directions for LRC activities. The QMP will clarify instructions regarding indexing parameters, legibility, Litigation Discovery records, tables of contents, records corrections, etc. Overall, the terminology and instructions will be clarified to promote a better understanding of the requirements.

After QMP-17.01, R4 is approved, instruction of personnel will begin. This instruction will include classroom sessions for key personnel, with reading assignments for other personnel as deemed appropriate.

Also, the LRC activities to implement the new QMP and to return records for correction will increase both LRC personnel and Records Source awareness of the QMP-17.01 requirements.

BLOCK 17: EFFECTIVE DATE: October 1, 1990 - QMP-17.01, R4 approved.
December 3, 1990 - QMP-17.01, R4 instruction for key personnel.

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

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

QMP-17.01, R3, was prepared to identify records as individual records which have specific indexing requirements that must be included on the records prior to submitting the records to the CRF. Records packages have requirements for indexing information to be on the Table of Contents for the complete records package (not on each individual document within the records package). An investigation into the cited deficiencies revealed the following:

a,b,c INDEXING PARAMETERS: The Table of Contents for a record package includes the WBS # and the QA designation. Each document within the package does not need to show the same WBS # or QA designation. No corrections are required for the individual documents and the packages will be processed according to the parameters specified on the Table of Contents.

d COMPLETE PACKAGES: Individual documents, especially correspondence, within a records package may appear to not have attachments/enclosures. However, those documents (attachments, enclosures, etc.) are an integral part of the package already, and to avoid redundancy or duplication, those documents would not necessarily be physically attached or enclosed with a particular piece of correspondence. No remedial actions are warranted.

e TABLE OF CONTENTS: For any record packages already submitted and accepted by the CRF, the Table of Contents will not be corrected. The Table of Contents within record packages at LRC were reviewed by LRC personnel. When correction was needed, LRC personnel worked closely with Record Sources to assure Tables of Contents reflect the actual contents of the record packages.

f ILLEGIBLE COPIES: The cited package (GS.89.M00022) was prepared and processed as part of the DOE Litigation Discovery materials. Aerial photographs were noted as not included in the package. A special instruction sheet is part of the package showing these as "one-of-a-kind" records. This sheet explains that the original photographs were still being used and were with the investigator at a specified (office) location.

A copy of the photographs was made for package GS.89.M00025 (cited in SDR 559). Other record packages that would eventually need to include the photographs or a reference to them, will use a special instruction sheet showing the location of the original photographs. This avoids duplication of materials and provides needed cross-checking.

BLOCK 15: EFFECTIVE DATE: Complete

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

Causes:

a,b,c,d,e The terminology and instructions included in QMP-17.01, R3 were not clear regarding the Record Source preparation and LRC acceptance requirements for record packages.

f The role and requirements for Litigation Discovery records as part of the records management system was not clearly explained.

Preventive Actions:

QMP-17.01, R4 is approved and clarifies directions for Record Source activities. The QMP clarifies instructions regarding indexing parameters, legibility, Litigation Discovery records, tables of contents, records corrections, etc. Overall, the terminology and instructions have been clarified to promote a better understanding of the requirements.

QMP-17.01, R4 was approved and issued as a reading assignment for personnel. Instruction will also include classroom sessions for key personnel as deemed appropriate. This classroom instruction will stress compliance with records requirements as stated in QMP-17.01, R4.

A new procedure, QMP-17.03, R0, Local Records Center, has been written and approved. This procedure clarifies the LRC activities for acceptance of QA records and QA record packages. Additionally, the full receipt process has been reviewed and corrections made as necessary by the Records Coordinator. Reading assignments have been assigned and completed. LRC employees have been reminded that work must be conducted in accordance with the requirements of QMP-17.03.

BLOCK 17: EFFECTIVE DATE:

September 24, 1990 - QMP-17.01, R4 became effective
November 5, 1990 - QMP-17.03, R0 becomes effective
December 3, 1990 - instruction in QMP-17.01, R4 for key personnel

BLOCK 18: SIGNATURE/DATE: Ian R Hu 1/06/96

ORIGINAL
THIS IS A RED STAMP

YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization

1 Date 6-28-90 | 2 Severity Level ☐ 1 ☐ 2 ☒ 3 | Page 1 of 2

3 Discovered During: YMP-90-03

3a Identified By: R. Weeks and M. Meyer

4 SDR No. 559 Rev. 0

5 Organization: USGS

6 Person(s) Contacted: Peggy Warner

7 Response Due Date is 20 Working Days from Date of Transmittal

8 Requirement (Audit Checklist Reference, if Applicable)
YMP-USGS-QMP-17.01, Revision 3, Paragraph 5.1.7.2 states in part, " That written/typed records are legible, reproducible, and can be microfilmed in accordance with the standards for processing and

9 Deficiency
Contrary to the above requirement, record package No. GS.89.M.00025 contained illegible copies of aerial photos and field notebooks (by Scott 10/20/81 - 4/26/84) with illegible information.

10 Recommended Action(s): ☒ Remedial ☐ Investigative ☐ Corrective

Aprvl.

11 QAE/Lead Auditor/Date: Richard L. Weeks 7/16/90

12 Division Manager/Date: N/A

13 Project Quality Mgr./Date: Otheria Hampton 7-17-90

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

17 Effective Date _____

18 Signature/Date: Larry R. Hayes 8/20/90

Comp. by Orig. QA Org.

	QAE/Lead Auditor/Date	Division Manager/Date	Project Quality Mgr./Date
19 Response Accepted	Richard L. Weeks 11/13/90	N/A	Otheria Hampton for 11/20/90
20 Corrective Action Verif. Satisfactory			

21 Remarks
Response, Hayes to Horton, 8-20-90
Request Amended Response 10/5/90 - QA:CEH-133
Request Response Extension - Hayes to Horton - Accepted 11/6/90 - QA:CEH-684
Request Response Extension - Hayes to Horton - Accepted 11/7/90 - QA:CEH-723
Amended Response 11/8/90 - Hayes to Horton

22 QA CLOSURE	QAE/Lead Auditor/Date	Division Manager/Date	PQM/Date

8 Requirement (continued)

microfilming..."

9 Deficiency (continued)

Specific problems:

- o QA records submitted to the LRC had illegible information written on them. An example was aerial photos which documented sample locations however, the identifiers for specific sample locations were not legible.

- o Entries in field notebooks are not always legible (pencil entries) examples on pages 1, 2, 7, 8, 11, and 13. (Notebook No. 1)

USGS RESPONSE TO YMPO STANDARD DEFICIENCY REPORT (SDR) NO. 559

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

The files that were reviewed during the audit were prepared from 1981 through 1984 and consisted of records that were collected as a deliverable to the DOE/YM Project Office for Litigation Discovery in 1987. When the LRC prepared the records, special instruction sheets were inserted to identify the location of original aerial photographs (one-of-a- kind items) which remain in use by the USGS. A letter is contained within the file which identifies the package submitted to the CRF as the official copy, thus the YMP-USGS LRC copy is only retained for USGS information purposes. Pages of the record package (for the notebooks and the photographs) that were forwarded to the CRF as the official record copy were marked "Best Available Copy" as required. The official copy is on microfilm in the CRF. Also, reference is made on the table-of-contents that the records are Best Available Copies.

The "Scope" of QMP-17.01, is being revised to clearly identify the processing requirements for those records collected and submitted under DOE/YMP Litigation Discovery.

BLOCK 15: EFFECTIVE DATE: October 1, 1990 - QMP Revision 4.

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

Not applicable for Level 3 SDR.

BLOCK 17: EFFECTIVE DATE:

Not applicable for Level 3 SDR

USGS AMENDED RESPONSE TO YMPO SDR 559
Page 1 of 1

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

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

The LRC has contacted the investigator concerned with the cited aerial photographs and field notebooks. The LRC copies of the field notebooks are the best copies available and are so noted. No further remedial actions are necessary for the field notebooks.

The aerial photograph is currently in use, however the Geologic Division is pursuing the possibility of obtaining a better copy. The results will be provided to the Project Office in a supplemental response.

BLOCK 15: EFFECTIVE DATE: December 15, 1990

BLOCK 18: SIGNATURE/DATE: Larry R. Hayes 11/06/90

Ltr dtd 11/8/90 - Hayes to Hartman