



United States Department of the Interior



GEOLOGICAL SURVEY
BOX 25046 M.S. _____
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

WBS 1.2.9.3.2
QA: QA
October 29, 1990

IN REPLY REFER TO:

Donald G. Horton, Director
Quality Assurance Division
Yucca Mountain Project Office
U.S. Department of Energy
P.O. Box 98608
Las Vegas, NV 89193-8608

SUBJECT: Amended responses for YMPO Standard Deficiency Reports (SDRs) Nos. 554 through 561

References:

DOE/YMP letter date 10-05-90 from D.G. Horton to L.R. Hayes, subject: Evaluation of responses to SDR 554 through 561, R0, resulting from Project Office QA Audit 90-03 of USGS

USGS letter dated 10-16-90 from L.R. Hayes to D.G. Horton, subject: Amended responses to SDRs 554 through 561

Proposed amended responses to the subject SDRs are being coordinated with individual authors of each SDR. The amended response to the SDR 561 has been coordinated and is enclosed. Amended responses to the other SDRs are pending further discussion with appropriate personnel to assure that they reflect changes agreed to by the auditors and USGS representatives in a meeting September 19, 1990 and subsequent telephone calls.

The October 16, 1990 letter requested an extension until today to prepare acceptable amended responses. Due to the Project Office qualification audit and availability of our personnel, the coordination effort will take an additional two weeks. Amended responses to the other SDRs will be forwarded as agreement is reached. A copy of the amended response to SDR 561 has been telefaxed to Nita Brogan today and the original will be overnight mailed to her.

If you have any questions, please contact Dave Appel, Quality Assurance Manager.

Larry R. Hayes

Larry R. Hayes,
Technical Project Officer
Yucca Mountain Project

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Letter to D.G. Horton,

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Enclosure

cc:

E.H. Roseboom
N.J. Trask
M.W. Reynolds
D.H. Appel
D.C. Gillies
R.B. Raup
K.W. Causseaux
J.B. Woolverton
J.J. Barth
J.J. Brogan (original attachment)
A.M. Whiteside
T. Mendez-Vigo
R.B. Constable
S. Berkel
R.W. Gray
S.W. Zimmerman
K.R. Hooks
J.W. Gilray
QA logbook
LRC File 3.16.01-3 (SDRs 554 - 561)

USGS AMENDED RESPONSE TO YMPO SDR 561

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This 10-29-90 response is intended to supplement the 8-20-90 response.

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

Sub-part 1 (Audit Schedule not identifying full QA program coverage): The Audit Schedule had included "implementing QMPs" for the Menlo Park audit and the audit plan for the Menlo Park audit included both criterion 1 and 15. Because there was limited or no implementation of these criterion available at Menlo Park, they were both added to the scope of the internal audit 90-13 for the Denver/Golden area. Revision 4 of the audit schedule for FY90 and Revision 0 of the FY91 audit schedule will specify the criteria (by criteria number) to be included.

Sub-part 2 (Observations used to document program violations): For QA program violations, a determination is needed regarding the basis for the requirement and the impact on quality. The two cited Observations have been re-evaluated. Neither Observation represents the violation of a specific USGS QAPP (and DOE/YMP 88-9) requirement, nor do the conditions represent an adverse impact on quality. Hence, the USGS documented the conditions on Observations. No remedial actions are needed.

Sub-part 3 (Scheduling supplier requalifications): The Audit Schedule was updated to reflect supplier requalification information.

ENSECO, Rocky Mountain Analytical Laboratory: This supplier is no longer needed for the analytical service, therefore the supplier requalification was dropped from the Approved Vendors List.

National Water Quality Laboratory (NWQL) and the Stable Isotope Laboratory were added to the Audit Schedule via the Vendor Evaluation Schedule (attached to audit schedule).

Sub-part 4 (determining audit coverage for applicable QA program criteria): QMP-18.01 requires that "audits shall be scheduled at a frequency commensurate with the importance or status of the activity or task...". The audit coverage for FY90 is considered adequate.

USGS AMENDED RESPONSE TO YMPO SDR 561

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Sub-part 5 (effectiveness statement): Audit Report 90-02 has been re-evaluated to determine if effectiveness was addressed. Although the effectiveness statement was not explicit in Audit Report 90-02, the report clearly indicates that the results were generally satisfactory and that the QA Program was being implemented properly with the exceptions noted. Therefore, the effectiveness is considered to be adequately, if not explicitly, covered and no further clarification of the audit report is necessary at this time.

BLOCK 15: EFFECTIVE DATE:

October 31, 1990 - Audit Schedule FY90, R4 and FY91, R0 to be issued

BLOCK 16: CAUSE OF THE CONDITION & CORRECTIVE ACTION TO PREVENT RECURRENCE: (Reference part 4)

The need for additional audits and/or redefinition of the scope of planned audits must be evaluated based in part on the outcome of the audits performed (reference QMP-18.01, R5, para. 5.1.1.1). If no implementation of a criterion is found during an internal audit, further evaluation during a subsequent audit will be considered.

BLOCK 17: EFFECTIVE DATE:

Not applicable.

BLOCK 18: SIGNATURE/DATE:

[Handwritten Signature] 10/29/90