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Mr. Dwight Shelor, Acting Associate Director
for Systems Integration and Regulations
Office of Civilian Radioactive Waste Management
U. S. Department of Energy, RW 30
Washington, D.C. 20585

Dear Mr. Shelor:

SUBJECT: SURVEILLANCE OBSERVATION OF THE U.S. GEOLOGICAL SURVEY QUALITY ASSURANCE PROGRAM

I am transmitting the U.S. Nuclear Regulatory Commission (NRC) Surveillance Observation Report for the U.S. Department of Energy (DOE)/Yucca Mountain Project Office (YMPO) Quality Assurance (QA) Surveillance No. YMP-SR-90-038 of the U.S. Geological Survey (USGS) conducted at Denver, Colorado, and the Nevada Test Site (NTS), on September 10-14, 1990. The NRC staff participated as an observer on the DOE/YMPO surveillance of the USGS QA program.

The NRC staff observed and evaluated the DOE/YMPO QA surveillance to gain confidence that DOE and USGS are effectively implementing the requirements of their QA program pertaining to corrective actions taken with regard to previously identified deficiencies, and to verify the implementation of their QA and technical procedures under Criteria 4, 12, 15, and 16. The staff's evaluation is based on direct observations of the surveillance team members, discussions with the surveillance team and USGS staff, and reviews of pertinent QA and technical records relating to corrective actions and implementation of the USGS QA and technical procedures.

The scope of their surveillance was limited to procedural implementation. No assessment of technical adequacy and qualification of any of the technical documents (study plans and field data) was made during the surveillance. The NRC observer found the DOE/YMPO surveillance of the USGS QA program useful and effective. The surveillance team was familiar with the USGS QA Plan and the relevant QA procedures being implemented. Their checklist for this surveillance was well prepared and utilized in determining the status and adequacy of the QA program under 10 CFR Part 50, Appendix B, Criteria 4, 12, 15, and 16. The team seemed to have a good knowledge of the requirements of the Nevada Nuclear Waste Storage Investigations Quality Assurance Plan (NNWSI/88-9) and applicable QA procedures.

The NRC staff agrees with DOE/YMPO surveillance team's conclusion that the procedural implementation of the USGS QA program under Criteria 4, 12, 15, and

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16 is adequate. In addition, the staff was satisfied that USGS is closing out deficiencies identified during previous audits and surveillances in a satisfactory manner.

If you have any questions concerning this report, please contact Tilak Verma of my staff at (301) 492-3465 or FTS 492-3465.

Sincerely,

/s/ by Joe Holonich

for John J. Linehan, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure: As Stated

cc: R. Loux, State of Nevada
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SURVEILLANCE OBSERVATION REPORT

1.0 INTRODUCTION

The United States Geological Survey (USGS) is responsible for conducting geologic, geophysical, hydrologic, and seismologic investigations in support of the U.S. Department of Energy's (DOE) waste management and site characterization activities for the Yucca Mountain Project (YMP). The investigations are ongoing at the Nevada Test Site and the USGS offices in Denver, Colorado; Menlo Park, California; and Las Vegas, Nevada.

From September 10-14, 1990, the DOE/Yucca Mountain Project Office (YMPO) conducted surveillance No. YMP-SR-90-038 of the USGS QA program at Denver, Colorado, and at the Nevada Test Site, in accordance with the YMPO Quality Management Procedure, QMP-18-02, Revision 1 "Surveillances." The U.S. Nuclear Regulatory Commission (NRC) staff participated in the surveillance as an observer. This report documents the staff's assessment of the effectiveness of the DOE/YMPO surveillance and the adequacy of the USGS QA program in the areas of corrective actions (CA) taken with regard to previously identified deficiencies and the development and procedural implementation under Criteria 4, 12, 15, and 16.

2.0 PURPOSE

This DOE/YMPO surveillance evaluated the adequacy and status of procedural implementation of the USGS QA program in selected program elements and verified corrective actions taken by the USGS to close out previously identified deficiencies. The NRC staff's purpose in observing this surveillance was to gain confidence that the DOE and its contractors are properly implementing the requirements of QA program by assessing the effectiveness of the DOE/YMPO surveillance and determining the adequacy of the USGS QA program.

3.0 SCOPE

The DOE/YMPO surveillance team selected Criteria 4, 12, 15, and 16 requirements from the NNWSI/88-9 QA Plan and the USGS QAPP for review and assessment of QA program adequacy and status of procedural implementation. The scope of this surveillance did not include any review of the technical adequacy and qualification of the technical products such as study plans, technical procedures, or field data.

4.0 SURVEILLANCE PARTICIPANTS

DOE/YMPO	NRC
Donald Harris, HARZA, Team Lead Frank Kratzinger, SAIC, Team Member Robert B. Constable, DOE, Team Member	Tilak R. Verma, Observer

5.0 SURVEILLANCE SUMMARY RESULTS

The DOE/YMPO surveillance team conducted a detailed examination and review of the USGS records, logs and documents to assess compliance with the procedural requirements. The team interviewed several USGS and contractor personnel to assess their knowledge of applicable procedures under each criterion. Adequacy of controls and status of implementation for selected procedures was assessed and documented on the checklist for each of the selected criteria. The surveillance team identified one weakness in the portions of the USGS QA program covered by the surveillance. This weakness was identified as an observation under Criterion 15 (Control of Nonconforming Items) for a lack of a designated hold area for nonconforming items with "Hold Tags." This weakness, if corrected in a timely manner, is not serious enough to affect the adequacy of QA controls or their procedural implementation. The surveillance team concluded that the QA program controls under Criteria 4, 12, 15, and 16 are adequate and their implementation is satisfactory. The surveillance team did not assess the effectiveness of implementation for these criteria of the USGS QA program.

6.0 USGS AND CONTRACTOR PERSONNEL CONTACTED

L. R. Hayes, Technical Project Officer, USGS
T. Chaney, Associate QA Manager, USGS
A. Handy, QA Specialist, USGS
A. Whiteside, QA Advisor, SAIC-Golden
P. Warner, Records Coordinator, USGS
M. Mustard, QA Specialist, USGS
D. Porter, Manager, QA Records Support, SAIC-Golden
R. Luckey, NHP, USGS
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D. Baldwin, NHP, USGS
J. Ziemba, QA Audit Specialist, SAIC-Golden
J. LaMonica, Records Specialist, USGS
T. Mendez-Vigo, NHP QA, USGS
K. Causseaux, SP Coordinator/NHP, USGS
M. Brooks, QA Specialist, SAIC-Golden

7.0 NRC CONCLUSIONS

The NRC observer found the DOE/YMPO surveillance of the USGS QA program useful and effective. The surveillance team was familiar with the requirements of the NNWSI/88-9 QA Plan and the USGS QAPP. Their checklist for this surveillance was well prepared and utilized in determining the adequacy of QA controls under Criteria 4, 12, 15, and 16 and for assessing the status of completeness and implementation of all the applicable procedures under these criteria. The team was thorough and professional in interviewing the USGS and contractor personnel and in conducting the surveillance.

The scope of this surveillance was limited to procedural implementation. No assessment of technical adequacy and qualifications of any of the technical documents (such as study plans and field data) was made during the surveillance. The surveillance identified one weakness in the USGS QA program under Criterion 15 (Control of Nonconforming Item) and resulted in an Observation for a lack of designated hold area for items with "Hold Tags." This weakness, if corrected in a timely manner, is not serious enough to affect the adequacy of QA controls or their procedural implementation. The NRC staff agrees with the DOE/YMPO surveillance team's conclusion that the USGS QA program provides adequate controls and that the procedural implementation of the procedures under the above criteria is also adequate. In addition, the staff was satisfied that USGS is closing out deficiencies identified during previous audits and surveillance in a satisfactory manner.