



Department of Energy
 Yucca Mountain Site Characterization
 Project Office
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WBS 1.2.9.3
 QA

FEB 15 1991

Larry R. Hayes
 Technical Project Officer
 for Yucca Mountain
 Site Characterization Project
 U.S. Geological Survey
 101 Convention Center Drive
 Suite 860
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CLOSURE OF STANDARD DEFICIENCY REPORTS (SDRS) 555, 559, AND 560, REVISIONS 0, RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION AUDIT 90-03 OF U.S. GEOLOGICAL SURVEY

SDRs 555, 559, and 560, Revisions 0, have been closed based on satisfactory verification of completed corrective actions. Copies of the SDRs are enclosed for your files.

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

Donald G. Horton, Director
 Yucca Mountain Quality Assurance Division

YMQAD:CEH-2197

Enclosure:
 SDR 555, 559, and 560, Revisions 0

cc w/encl:
 S. W. Zimmerman, NWPO, Carson City, NV
 K. R. Hooks, NRC, Washington, DC
 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

FULL TEXT ASCII SCAN

YMP-5
 9102270085 910215
 PDR WASTE PDR
 WM-11

102.7
 WM-11
 NH03

YMPO STANDARD DEFICIENCY REPORT

N-QA-038
4/89

Completed by Originating QA Organization	1 Date JUNE 29, 1990		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 27
	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:				
Completed by Organization in Block 5	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): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective				
	11 QAE/Lead Auditor/Date J. Clark 7/16/90		12 Division Manager/Date N/A		13 Project Quality Mgr./Date C. J. ... 7-17-90
Completed by Org.	14 Remedial/Investigative Action(s) See Attached Response.				
	15 Effective Date _____				
	16 Cause of the Condition & Corrective Action to Prevent Recurrence				
Comp. by Orig. QA Org.	17 Effective Date _____				
	18 Signature/Date James E. Clark 8/20/90				
	19 Response Accepted	QAE/Lead Auditor/Date J. Clark 11/16/90	Division Manager/Date N/A	Project Quality Mgr./Date C. J. ... 11/20/90	
	20 Corrective Action Verif. Satisfactory	QAE/Lead Auditor/Date J. Clark 11/16/90	Division Manager/Date N/A	Project Quality Mgr./Date C. J. ... 11/20/90	
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 10/16/90 - QA:CEH-684 Request Response Extension 10/29/90 - Hayes to Horton - Accepted 11/7/90 - QA:CEH-723 Amended Response 11/21/90 - Hayes to Horton - Accepted YMQAD:CEH-1117 - 12/11/90 CONTINUED: - SEE PAGE 3 of 3					
22 QA CLOSURE	QAE/Lead Auditor/Date Robert ... 2/1/91	Division Manager/Date N/A	PQM/Date C. J. ... 2/1/91		

YMPO STANDARD DEFICIENCY REPORT
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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

YMPO STANDARD DEFICIENCY REPORT
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9 Deficiency (continued)

nb
2/11/91

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

21. REMARKS. (CONTINUED) - INTERVIEW G.D. M. MUSTARD.

- a) NCR-89-26 REVIEWED AND APPROVED FOR PROPOSED REVISION.
- b) QMP 15.01 REV. 4. (MOD.1) PROCEDURAL REVISION REVIEWED FOR CONTENT.
- c) NCR-89-24; NCR 89-30 & NCR 90-02 REQUIRE NO REVISION.

RB Cowstable 2/11/91

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

USGS AMENDED RESPONSE TO YMPO SDR 555
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:

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 Heston

USGS AMENDED RESPONSE TO YMPO SDR 555
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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:

Robert J. Taylor 11/8/90

YMPO STANDARD DEFICIENCY REPORT

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Completed by Originating QA Organization	1 Date 6-28-90		2 Severity Level <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3		Page 1 of 25		
	3 Discovered During YMF-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						
Completed by Organization in Block 5	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): <input checked="" type="checkbox"/> Remedial <input type="checkbox"/> Investigative <input type="checkbox"/> Corrective						
	11 QAE/Lead Auditor/Date <i>Richard L. Weeks 7/16/90</i>		12 Division Manager/Date - N/A		13 Project Quality Mgr./Date <i>Catherine Hampton 7-17-90</i>		
	14 Remedial/Investigative Action(s) See Attached Response.						
Comp. by Orig. QA Org.	15 Effective Date _____						
	16 Cause of the Condition & Corrective Action to Prevent Recurrence						
	17 Effective Date _____						
	18 Signature/Date <i>Larry R. Hayes 8/20/90</i>						
19 Response Accepted		QAE/Lead Auditor/Date <i>Richard L. Weeks 11/13/90</i>		Division Manager/Date N/A		Project Quality Mgr./Date <i>Catherine Hampton 11/24/90</i>	
20 Corrective Action Verif. Satisfactory		QAE/Lead Auditor/Date <i>Richard L. Weeks 11/13/90</i>		Division Manager/Date N/A		Project Quality Mgr./Date <i>Catherine Hampton 2/11/91</i>	
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-654 Request Response Extension - Hayes to Horton - Accepted 11/7/90 - QA:CEH-723 Amended Response 11/8/90 - Hayes to Horton - Accepted PMBAD:CEH-1117 - 12/11/90 Amended Response 12/17/90 - Hayes to Horton - CONTINUED:- SEE PAGE 2 of 2.							
22 QA CLOSURE		QAE/Lead Auditor/Date <i>Richard L. Weeks 2/11/91</i>		Division Manager/Date N/A		PQM/Date <i>Catherine Hampton 2/11/91</i>	

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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)

21. REMARKS. (CONTINUED). INTERVIEWED M. MUSTARD, M. MURREY, R. SCOTT.

- a) REVIEWED ONE-OF-A-KIND AERIAL PHOTOGRAPHS HELD BY R. SCOTT (SCIENTIST) PRIOR TO SUBMITTAL TO LRC. THESE PHOTOGRAPHS ARE USED IN ONGOING STUDIES & CAN NOT BE COPIED. ALL PHOTOGRAPHS ARE IN GOOD ORDER & USEABLE.
- b) REVIEWED FIELD NOTEBOOKS COPIED TO ACHIEVE A BETTER REPRODUCIBLE COPY — NEW COPIES ACCEPTABLE.
- c) ASSURED ONE-OF-A-KIND AERIAL PHOTOGRAPHS NOT YET SUBMITTED TO LRC ARE READILY ^{RBC 2/11/91} RETRIEVABLE. LETTER IN LRC IDENTIFIES LOCATION. ^{RETREIUSBLE}
- d) REVIEWED LETTER TO L. CARPENTER (YMP) FROM L. HAYES DATED 9/4/90 & LETTER FROM L. CARPENTER TO L. HAYES DATED 10/5/90. THESE LETTERS ADDRESS ONGOING USGS/YMP RECORDS CONTROL & USE.
RBC 2/11/91

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
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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: Sam R. Hunt 11/06/90

Ltr dtd 11/8/90 - Hayes to Harton

SUPPLEMENTAL RESPONSE FOR DOE/YMP SDR 559
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Per investigation activities of the Geologic Division and the Local Record Center, the following information is provided to supplement the 11/06/90 USGS Response.

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTIONS(S):

The response dated November 6, 1990 stated that the "best available copy" of the field notebooks was identified and submitted to the CRF. Since then the LRC has obtained additional copies of the field notebooks through the use of a new photocopy machine plus different techniques to enhance poor images. The new copies are being compared against the Project microfilm and the LRC will determine whether the better copies can be sent to the CRF as a replacement. This activity will be completed by February 1, 1991.

Aerial Photographs:

The photocopies of aerial photographs submitted to the CRF with the record package are the "best available copies." The "slipsheets" submitted with the package indicate the location of the aerial photographs as required. The aerial photographs are considered "one-of-a-kind records" subject to submittal requirements consistent with the DOE/YMP Records Management Plan, Revision 1, Page A-9, Sec. A.4, Item 4:

A-4 SUBMITTAL OF RECORDS TO THE LRC

- Item 4. One-of-a-kind records (records that cannot be duplicated or microfilmed or would lose their meaning when microfilmed, such as radiographs, multicolored maps, and map overlays) shall be submitted to the LRC when no longer in use. If the record should be part of a record package, but is still in use, a complete description and the storage location of the record shall be provided to the LRC.

BLOCK 15: EFFECTIVE DATE: February 1, 1991

BLOCK 18: SIGNATURE/DATE:

Tony Bruno, acting
12/17/90

Larry R. Hayes,
YMP-USGS Technical Project Office

*Ltr dtd 12/17/90 - Appeal to
Horton*

YMPO STANDARD DEFICIENCY REPORT

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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>Arthur Hayes 7-17-90</i>
	14 Remedial/Investigative Action(s) See Attached Response.				15 Effective Date _____
Completed by Org. QA Org.	16 Cause of the Condition & Corrective Action to Prevent Recurrence <i>SEE ATTACHED RESPONSE</i>				
	17 Effective Date _____				
	18 Signature/Date <i>Larry R. Hayes 8/20/90</i> <i>Richard L. Weeks 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>Arthur Hayes 1/11/91</i>	
	20 Corrective Action Verif. Satisfactory	QAE/Lead Auditor/Date <i>Richard L. Weeks 2/11/91</i>	Division Manager/Date <i>N/A</i>	Project Quality Mgr./Date <i>Arthur Hayes 2/11/91</i>	
	21 Remarks Response, Hayes to Horton, 8-20-90 Request Amended Response 10/5/90 - GA:CEH-133 Request Response Extension 10/14/90 - Hayes to Horton - Accepted 11/6/90 - GA:CEH-684 Request Response Extension 10/29/90 - Hayes to Horton - Accepted 11/7/90 - GA:CEH-723 Amended Response 11/8/90 - Hayes to Horton - Accepted 11/8/91 - YMQAD:CEH-1728 CONTINUED ON PAGE 2 of 2.				
22 QA CLOSURE	QAE/Lead Auditor/Date <i>Richard L. Weeks 2/11/91</i>	Division Manager/Date <i>N/A</i>	PQM/Date <i>Arthur Hayes 2/11/91</i>		

YMPO STANDARD DEFICIENCY REPORT
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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.

21. REMARKS. (CONTINUED) INTERVIEWED A. HANDY.

- a) A MEMO TO DISTRIBUTION WAS ISSUED.
subject: ^{YMP- U.S.G.S.} IMPLEMENTATION OF A ^{DOE/YMP} AP-5.1Q REV. 1, " CONTROL AND TRANSFER OF TECHNICAL DATA ON THE YUCCA MOUNTAIN PROJECT".
- b) ALL TRAINING RECORDS REVIEWED.
- c). QUESTION ^{RAC 2/11/91} & ANSWER SESSION WAS GIVEN FOR ALL AP-5.1Q USERS. THIS SESSION WAS FORMAL & RECORDED AS TRAINING.

R.L.W. 2/12/91

a) CONTINUED - ATTACHED TO THIS MEMO IS A THREE PAGE DOCUMENT TITLED, " USGS GUIDANCE FOR THE USE OF ADMINISTRATIVE PROCEDURE 5.1Q 'CONTROL AND TRANSFER OF TECHNICAL DATA ON THE YUCCA MOUNTAIN PROJECT' " THIS DOCUMENT IS ATTACHED.

Roland L. White 2/12/91

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

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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 11/06/90

Sta dtd 11/8/90 - Hayes to Norton