



Department of Energy
Washington, DC 20585

JUN 03 1991

Mr. John J. Linehan
Deputy Director
Division of High-Level
Waste Management
Office of Nuclear Material
Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Linehan:

This letter responds to your letter of October 24, 1990 (Linehan to Shelor), which notifies you as requested that the remaining exception, "Personnel Qualifications," for the Office of Civilian Radioactive Waste Management (OCRWM) acceptance of the U.S. Geological Survey (USGS) Quality Assurance (QA) Program has been addressed.

Enclosed is Surveillance Report Number YMP-SR-91-012. This surveillance was conducted by the Yucca Mountain Quality Assurance Division at USGS in Lakewood, Colorado, on March 28, 1991. The surveillance was performed to evaluate implementation of the USGS procedure governing the development and conduct of training and the qualification and certification of personnel to perform activities affecting quality (Quality Management Procedure (QMP) 2.07, Revision 0, Training Development and Documentation).

During this surveillance, corrective action for related Standard Deficiency Reports (SDRs) 143, 145, and 331 was verified and subsequently closed. The surveillance report verifies that the Privacy Act issue, related to these SDRs and Personnel Qualifications, has been found to be satisfactorily resolved. Based on the objective evidence examined during the surveillance, QMP 2.07 is being implemented adequately and no condition was identified that indicated a need to issue a Corrective Action Request.

Based on this information, the OCRWM Office of Quality Assurance concludes that the USGS QA Program is acceptable for implementation of new site characterization activities and other quality-related activities for the Yucca Mountain Site Characterization Project with no exceptions.

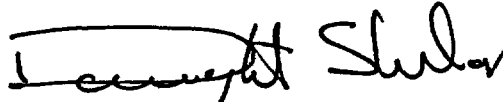
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The U.S. Department of Energy (DOE) requests your review and unconditional acceptance of the USGS QA Program based on the enclosed Surveillance Report.

Should you have any questions, please contact Linda Desell of my office at (202) 586-1462.

Sincerely,



Dwight E. Shelor
Acting Associate Director for
Systems and Compliance
Office of Civilian Radioactive
Waste Management

Enclosure:

Yucca Mountain Quality Assurance Division Surveillance Report
Number YMP-SR-91-012 of Verification Activity Conducted March 28,
1991, at the U.S. Geological Survey, Lakewood, Colorado

cc w/copy of Enclosure:

C. Gertz, YMPO
R. Loux, State of Nevada
M. Baughman, Lincoln County, NV
D. Bechtel, Clark County, NV
S. Bradhurst, Nye County, NV
P. Niedzielski-Eichner, Nye County, NV
K. Hooks, NRC

YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION

SURVEILLANCE REPORT NUMBER YMP-SR-91-012

OF

VERIFICATION ACTIVITY

CONDUCTED MARCH 28, 1991

AT

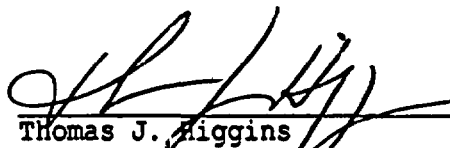
THE UNITED STATES GEOLOGICAL SURVEY

LAKEWOOD, COLORADO

ACTIVITY OBSERVED:

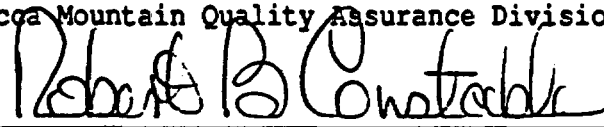
TRAINING DEVELOPMENT AND DOCUMENTATION

Prepared by:


Thomas J. Higgins
Surveillance Team Leader
Quality Assurance Scientist
Yucca Mountain Quality Assurance Division

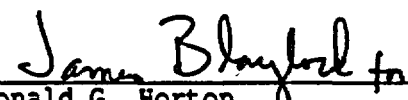
Date: 5-6-91

Concurred by:


Robert E. Constable
General Engineer
Yucca Mountain Quality Assurance Division

Date: 5-7-91

Approved by:


Donald G. Horton
Director
Yucca Mountain Quality Assurance Division

Date: 5/7/91

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1.0 INTRODUCTION

This report contains the results of the Yucca Mountain Quality Assurance Division (YMQAD) Surveillance No. YMP-SR-91-012 of the United States Geological Survey (USGS) conducted in Lakewood, Colorado, on March 28, 1991.

2.0 PURPOSE AND SCOPE

The purpose of this surveillance was to verify that USGS is implementing their procedure YMP-USGS-QMP-2.07, Revision 0, "Training Development And Documentation." Previously, no verification had been possible in this area due to Privacy Act considerations.

3.0 SURVEILLANCE PERSONNEL

The surveillance was conducted by the following personnel:

Thomas J. Higgins, Quality Assurance (QA) Scientist, Surveillance Team Leader, Science Applications International Corporation (SAIC)/YMQAD
Robert B. Constable, General Engineer, U.S. Department of Energy/YMQAD

4.0 SUMMARY OF SURVEILLANCE RESULTS

This surveillance was conducted in accordance with Yucca Mountain Project (YMP) Quality Management Procedure QMP-18-02, Revision 2, "Surveillance." A mark-up copy of USGS procedure YMP-USGS-QMP-2.07, Revision 0, was prepared in lieu of a checklist as the source of the requirements on which this surveillance was based. No findings were discovered that indicated the need for Corrective Action Requests.

The following data were obtained during the surveillance:

1. Section 5.1, Indoctrination

Subsection 5.1.1 states, in part, that "all personnel assigned quality-affecting activities on the YMP-USGS shall receive indoctrination."

The surveillance team examined the indoctrination records for fiscal years (FY) 1989 and 1990 that are maintained by the Training Coordinator (TC). The purpose of this examination was to determine whether the USGS is providing individuals with the initial orientation and general instruction to familiarize them with YMP-USGS programs, organization, methods, and procedures. FY 1990 records indicate that a total of 36 staff attended a total of three indoctrination sessions

conducted by an instructor. In addition, 52 individuals viewed a video tape that provides the same information for small-group and individual orientation. The TC indicated that approximately 350 personnel were indoctrinated in 1989. This file was given a cursory examination.

Subsection 5.1.4 states, in part, that "the need for additional Project-wide indoctrination shall be assessed and documented by the QA Manager."

Eleven letters were examined. These were issued at the initiative of the QA Manager or delegate and recommended additional training.

2. Section 5.2, Individual Training Needs

Subsection 5.2.1 states, in part, that "immediate supervisors, with TC assistance as necessary, shall identify training needs for personnel in technical, quality assurance, administrative, or other areas that could affect quality. Copies will be provided to the TC for planning and scheduling purposes."

Nine letters from the TC dealing with the conduct of training to meet specific individual training needs indicate that these needs are being identified and that the TC is being involved.

3. Section 5.3, Other Sources of Training Need Identification

Section 5.3.1 states, in part, that "when a new or revised implementing procedure or other Project-governing document is approved for YMP-USGS use, the QA Manager will notify the TC. Representatives of the Chiefs, and QA implementing staffs of each YMP-USGS operating Program shall identify Project personnel requiring training on the procedure or governing document."

A total of 46 letters supporting implementation were examined. Eleven letters from the QA Manager to the TC (also cited in Item 2 above) discussed general training needs, and 35 letters to line management discussed training needs for specific personnel reporting to these managers. The latter included the individual staff members' training history.

Section 5.3.2 states, in part, that "when an audit...or other evaluation indicates the need for improved or additional training, the responsible manager or the management team...shall identify Project personnel requiring supplemental training."

Fifty-one memoranda were examined. These were addressed to one or more people, and became required training assignments. Over 100 individuals were assigned training in this way.

4. Instructors

Section 5.6 states in part that "For unique classroom training, the qualifications of external vendors shall be defined in the contract specifications or sole-source contract justification. The TC shall solicit the support of the YMP-USGS subject-matter experts in identifying required qualifications."

There has been no training supplied by an external vendor to date.

Section 5.6.1 states, in part, that "instructors for unique classroom training from within the YMP-USGS ... shall be recognized subject-matter experts. Their qualifications must be verifiable."

USGS has a single course made up of seven sections, each dealing with one procedure. This course, Integrated Data Acquisition System (IDAS) -Technical Procedures, is presented by two instructors who are responsible for different segments.

IDAS-Technical Procedures, Course 90C-20

<u>Instructor</u>	<u>Verifier of Instructor Qualification</u>	<u>Procedure</u>
R. T. Getzen	J. P. Rousseau	USGS-HP-140 -141
A. J. Greengard	J. P. Rousseau	USGS-HP-135 -142 -143 -150 -151

Section 5.6.2 states, in part, that "all instructors for unique classroom training shall prepare a formal lesson plan that identifies specific objectives, and outlines the proposed content, process, and schedule of instruction to attain those objectives. Lesson plans must be approved by the TC and requesting management before training is conducted. Proposed training material packages shall be submitted with the lesson plan for approval by the requesting manager and TC."

Lesson plans for each of the seven segments of Course 90C-20 were examined. These are listed immediately above, were prepared by the indicated instructor, and all were approved by the Acting TC (P. Warner) and the Principal Investigator (J. P. Rousseau).

5. Training Documentation

Section 5.8.1 states, in part, that "verification of successful completion of training, understanding, and training effectiveness shall be documented as appropriate. This documentation must include, as a minimum, the title ..., the date ..., the objective of training, and, as appropriate, the signature of the instructor or manager."

There has been a single presentation of five of the seven segments that make up Course 90C-20. The signed attendance sheets for the five sessions were examined and contained the following information:

<u>Date</u>	<u>Segment/Procedure</u>	<u>Instructor</u>	<u>Number of Student Signatures</u>
10/29-30/90	USGS-HP-141	R. T. Getzen	7
10/30-31/90	USGS-HP-140	R. T. Getzen	7
10/31/90	USGS-HP-142	A. J. Greengard	2
11/01/90	USGS-HP-135	A. J. Greengard	3
11/01/90	USGS-HP-151	A. J. Greengard	3

Section 5.8.2 states, in part, that "trainees who fail to meet training objectives shall be required to complete satisfactorily follow-up instruction prior to their performance of quality-affecting activities."

There is no record of a failure to meet a training objective by an individual to date.

5.0 CLOSURE OF OUTSTANDING DEFICIENCY REPORTS

Concurrent with the conduct of this surveillance, verification of completed corrective actions resulted in the recommendation for closure of Standard Deficiency Reports (SDRs) No. 143, 145, 331, 489, and 516. Consequently, these SDRs have been closed.

6.0 PERSONNEL CONTACTED DURING THE SURVEILLANCE

T. H. Chaney	Acting Quality Assurance Manager, USGS
M. H. Mustard	Hydrologist, Quality Assurance Office, USGS
A. M. Whiteside	QA Support to YMP-USGS Technical Project Officer, Golden, Colorado
K. L. Burgess-Kohn	YMP-USGS Training Coordinator, SAIC, Golden, Colorado

7.0 MEASURING AND TEST EQUIPMENT USED DURING THE SURVEILLANCE

None.

8.0 SYNOPSIS OF DEFICIENCY

No Corrective Action Requests were written.

9.0 RECOMMENDATIONS

There are no recommendations.

10.0 REQUIRED ACTIONS

There are no required actions.

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