

Department of Energy Washington, DC 20585 JUN 19 1991

Mr. John J. Linehan, Acting Director Repository Licensing and Quality Assurance Project Directorate 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 responds to your letter of May 13, 1991 (Linehan to Shelor), relative to a request by the U.S. Nuclear Regulatory Commission (NRC) that the U.S. Department of Energy (DOE) support an independent Quality Assurance (QA) audit of the U.S. Geological Survey (USGS) by the NRC staff. The NRC audit plan spans a 5-day period and covers the USGS Yucca Mountain Site Characterization Project QA program associated with Study Plan 8.3.1.2.3.1, "Site Saturated Zone Ground-Water Flow System." NRC requested that the audit be conducted in the late July 1991 time frame.

A review of our records (refer to Enclosure) identifies two audits and seven surveillances performed by DOE at the USGS since November 1989. The NRC participated in several of these audits and surveillances. The specific Study Plan you propose to audit was included in audit YMP-91-05 performed during May 20-24, 1991. No major deficiencies were identified during this audit by DOE or the NRC. Therefore, DOE questions the necessity for performing an audit of this activity at this time.

As a result of discussions between DOE and USGS, due to the current DOE audit schedule and a reorganization at USGS, and to ensure availability of the appropriate DOE and USGS personnel, DOE cannot support the audit time frame requested. However, after reviewing the enclosed information, if the NRC staff still recommends the audit, DOE can support the audit during the week of September 16-20, 1991. The scoping visit by the NRC staff one month prior to the proposed September audit date can be accommodated by DOE.

102.7 WM-11, 11.003 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:

USGS Audit and Surveillance Matrix

cc w/Enclosure:

- C. Gertz, YMPO
- R. Loux, State of Nevada
- K. Whipple, Lincoln County, NV
- M. Baughman, Lincoln County, NV
- J. Bingham, Clark County, NV D. Bechtel, Clark County, NV
- S. Bradhurst, Nye County, NV
- B. Raper, Nye County, NV
- P. Niedzielski-Eichner, Nye County, NV
- R. Campbell, Inyo County, CAR. Michener, Inyo County, CA
- G. Derby, Lander County, NV
- P. Goicoechea, Eureka, NV
- C. Schank, Churchill County, NV
- C. Jackson, Mineral County, NV
- F. Sperry, White Pine County, NV
- L. Vaughan, Esmeralda County, NV
- K. Hooks, NRC

ENCLOSURE

USGS AUDIT AND SURVEILLANCE MATRIX

UDIT/SURV REPORT DATE	# NO. OF CARS/SDR	SCOPE	NRC PARTICIPANTS	PAGE 1
AUDIT YMP-91-05 5/20-24/91	4 CARS	PROGRAMMATIC AND TECHNICAL AUDIT	J. GILRAY, T. VERMA, A. IBRAHAM, B. MABRITO (NRC C	ONSULTANT)
SURVEILLANCE YMP-SR-90-012 3/28/91	NONE	IMPLEMENTATION OF TRAINING DEVELOPMENT AND DOCUMENTATION USGS QMP-2.07 PROCEDURE	NONE	(
SURVEILLANCE YMP-SR-90-038 9/10-14/90	NONE	PROGRAMMATIC TO VERIFY IMPLEMENTATION OF PROCUREMENT -MEASURING AND TEST EQUIPMENT -NON-CONFORMANCE REPORTS -CORRECTIVE ACTION REQUESTS PROCEDURES		
AUDIT YMP-90-003 6/25-29/90	9 SDR'S	PROGRAMMATIC AND K. TECHNICAL AUDIT	HOOKS, J. BRADBURY, K. McCONNELL, P. JUSTICE, T. T	RBOVICH, T. VERMA

AUDIT/SURV REPORT	NO. OF CAR SDR	SCOPE	NRC PARTICIPANTS	PAGE 2	•
SURVEILLANCE YMP-SR-90-029 5/3-4/90	NONE	PROGRAMMATIC TO VERIFY IMPLEMENTATION OF PROCEDURES RELATED TO: -ORGANIZATION -TECHNICAL APPROVAL OF PUBLICATIONS -PREPARATION OF TECHNICAL PROCEDURES -CONTROL OF SCIENTIFIC NOTEBOOK & TECHNICAL ACTIVITIES -DOCUMENT CONTROL	NONE		
SURVEILLANCE YMP-SR-90-026 4/17-19/90	3 SDR'S	STUDY PLAN PREPARATION AND TECHNICAL REVIEWS TO CLOSE OUT SDR 418. ALSO INCLUDED REVIEW OF PUBLICATION & TECHNICAL PROCEDURES, CORRECTIVE ACTION REQUESTS, AUDITS AND SURVEILLANCES. STUDY PLANS INCLUDED 8.3.1.2.1.3 CHARACT.OF REGIONAL GROUND WATER FLOW 8.3.1.2.2.1 UNSATURATED ZONE INFILTRATION 8.3.1.4.2.2 STRUCTURAL SITE 8.3.1.5.1.4 ANALYSIS OF PALEO ENVIRONMENTAL HISTORY	J. CONWAY, K. McCONNELL, J. GILRAY FEATURES		

1

•

AUDIT/SURV REPORT DATE	NO. OF CAR & SDR'S	SCOPE	NRC PARTICIPANTS	PAGE 3
SURVEILLANCE YMP-SR-90-017 1/22-25/90	2 SDR'S	PROGRAMMATIC- TO VERIFY IMPLEMENTATION OF CERTAIN USGS PROCEDURES AND ALSO TO RESOLVE SDR 418	NONE	
SURVEILLANCE YMP-SR-90-019 2/20-23/90	NONE	COMPUTER SOFTWARE SOFTWARE QA PLAN IMPLEMENTATION	NONE	(
FIELD SURVEILLANCE YMP-SR-90-006 11/14/89	NONE	FIELD SURVEILLANCE ON HP-62 "METHOD FOR MEASURING SUBSURFACE MOISTURE CONTENT USING A NEUTRON MOISTURE METER"	NONE	

. .