



Department of Energy
 Yucca Mountain Site Characterization
 Project Office
 P. O. Box 98608
 Las Vegas, NV 89193-8608

WBS 1.2.9.3
 QA

To: Ken Hooks

JUN 11 1991

Larry R. Hayes
 Technical Project Officer
 for Yucca Mountain
 Site Characterization Project
 U.S. Geological Survey
 101 Convention Center Drive
 Suite 860
 Las Vegas, NV 89109

CLOSURE OF STANDARD DEFICIENCY REPORT (SDR) 135, REVISION 0, RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT 88-03 OF U.S. GEOLOGICAL SURVEY

SDR 135, Revision 0, has been closed based on satisfactory verification of completed corrective actions. A copy of the SDR is enclosed for your files.

If you have any questions, please contact Catherine E. Hampton at (702) 794-7973 or FTS 544-7973, or Donald J. Harris at (702) 794-7356 or FTS 544-7356.

Donald G. Horton, Director
 Yucca Mountain Quality Assurance Division

YMQAD:CEH-4178

Enclosure:
 SDR 135, Revision 0

- cc w/encl:
- K. R. Hooks, NRC, Washington, DC
 - T. H. Chaney, USGS, Denver, CO
 - S. W. Zimmerman, NWPO, Carson City, NV
 - C. H. Prater, SAIC, Las Vegas, NV, 517/T-06
 - 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

YMP-5

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 PDR WASTE PDR
 WM-11

*102.7
 WM-11
 NH03 1/1*

WMPO STANDARD DEFICIENCY REPORT

N-QA-C38
3/87

Completed by Originating QA Organization	1 Date 4/28/88		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 3
	3 Discovered During Audit No. 88-3	3a Identified By P. J. Rutz	3b Branch Chief Concurrence Date N/A	4 SDR No. 135 Rev. 0	
	5 Organization USGS-Menlo Park	6 Person(s) Contacted Karen Morganstern		7 Response Due Date is 20 Working Days from Date of Transmittal	
	8 Requirement (Audit Checklist Reference, if Applicable) (Refer to Audit checklist Item No. 4.3-4.6 and 4.11-4.17) A. NWSI-USGS-QAPP, R.4, Section 4, Procurement Document Control, Paragraph 4.2, states in part, "The USGS shall prepare work agreements,				
9 Deficiency A. There was no objective evidence that a work agreement, memorandum of understanding, or an interagency agreement existed for Requisition No. 9380-1053, Vendor, Ben Schulein.					
10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective 1. Take actions to correct the specific deficiencies noted on the SDR. 2. Determine if there are any other procurement documents with the					
Completed by Organization in Block 5	11 QAE/Lead Auditor Date	12 Branch Manager Date	13 Project Quality Mgr. Date		
	<i>[Signature]</i> 5/18/88	<i>[Signature]</i> 5/18/88	<i>[Signature]</i> 5/23/88		
14 Remedial/Investigative Action(s) A Corrective Action Report (CAR) was issued on 6-7-88 due to recurring deficiencies in the procurement process. This CAR will be revised to place greater emphasis on procurement problems that have occurred at USGS field offices. Greater emphasis will also be placed on the need for more active involvement by upper- (see page 3)					
15 Effective Date 7-15-88					
16 Cause of the Condition & Corrective Action to Prevent Recurrence The cause and the corrective action to prevent recurrence for these deficiencies will be determined by the response to the internal CAR (USGS-CAR-88-01)					
17 Effective Date N/A					
18 Signature/Date <i>[Signature]</i> 7/1/88					
Completed by Orig. QA Org.	19 Response <input type="checkbox"/> Accept <input checked="" type="checkbox"/> Amended Response <input type="checkbox"/> Reject		QAE/Lead Auditor/Date	Branch Manager/Date	
			<i>[Signature]</i> 4/20/89	<i>[Signature]</i> 208989	
	20 Amended Response <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject		QAE/Lead Auditor/Date	Branch Manager/Date	
			<i>[Signature]</i> 7/23/89	<i>[Signature]</i> F-21-89	
21 Verification <input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory		QAE/Lead Auditor/Date	Branch Manager/Date		
		<i>[Signature]</i> 6/5/91	<i>[Signature]</i> 6/6/91		
22 Remarks CORRECTIVE ACTION VERIFICATION ATTACHED - 6-5-91					
Con.	23 QA CLOSURE		QAE/Lead Auditor/Date	Branch Manager/Date	PQM/Date
			<i>[Signature]</i> 6/5/91	N/A	<i>[Signature]</i> 6/15/91

ENCLOSURE



WMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

N-QA-C39
10/85

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8 Requirement (continued)

memorandums of understanding, interagency agreements, management agreements, or other suitable documents."

B. NNWSI-USGS-QMP-4.01, R.1, Paragraph 4.1.1, requires the requestor to include the QA Level and the Scientific Investigation Plan (SIP) No. on the USGS Requisition.

C. Paragraph 4.1.3 requires that requisition documents include or reference applicable regulatory requirements, site investigation basis and other requirements that are necessary to assure adequate quality for the procurement of the material, equipment, or services utilized on the NNWSI Project.

D. Paragraph 4.1.4 requires that Level I items/services, requisition documents include provisions from the following Paragraphs, 4.1.4.1 through 4.1.4.5.

E. Paragraph 4.3.1 requires the requestor/PI to complete the USGS Requisition Form D1-1, Attachment 1, and the NNWSI Technical Review of Procurement Documents form, Attachment 2.

F. Paragraph 4.3.2 requires the NNWSI Branch Administrative Officer to assign a controlled requisition number to both Attachments 1 and 2 and to obtain the approval signature of the Chief, Branch of NNWSI.

G. Paragraph 4.3.3, requires the QA Manager to review the requisition in accordance with Attachment 3 Checklist for USGS Procurement Document QA Review. Upon satisfactory completion of the review, the QA Manager is to sign Attachment 3.

H. Paragraph 4.3.5 requires the USGS QA Manager to review all Level I and II contracts and purchase orders for QA compliance with the approved requisition prior to their release and to send copies of all Level I procurement documents and any subsequent changes to DOE/WMP.

I. NNWSI-USGS-QAPP, R.4, Section 4, Paragraph 4.6, requires the USGS to forward to the WMP QA (QASC-Audits and Surveillance Branch Manager) one copy of purchase documents, and changes thereto, as issued, when purchases involve QA Level I items or services.

9 Deficiency (continued)

B. There was no QA Level or SIP numbers identified on Requisition Nos. 9380-1017, 9380-1018, and 9380-1053

C. Requisition No. 9380-1053 was determined to be a QA Level I activity. No reference has been made to the applicable regulatory requirements, site investigation basis and any other requirements that are necessary to assure adequate quality for



WMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

N-QA-038
10/85

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Rev. 0

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9 Deficiency (continued)

the procurement.

D. Requisition No. 9380-1053, which has been identified as a QA Level I does not have any of the applicable provisions identified in Paragraph 4.1.4.1 through 4.1.4.5, Scope of Work Technical requirements, QA Requirements, Rights of Access, and Documentation requirements.

E. NNWSI Technical Review of Procurement Documents, Attachment 2 has not been prepared as required for Requisition No. 9380-1053.

F. The three (3) requisitions (Nos. 9380-1017, 9380-1018, and 9380-1053) that were reviewed during the course of the audit did not have the approval signature of the Chief, NNWSI.

G. Attachment 3 checklist for USGS Procurement Document QA Review has not been prepared for Requisition No. 9380-1053.

H. There is no evidence that the USGS QA Manager has reviewed Requisition No. 9380-1053 for QA compliance with the approved requisition prior to release. There is also no objective that copies of Level I procurement documents or any subsequent changes were sent to DOE/WMPO by the USGS QA office as required.

I. There is no objective evidence the USGS has forwarded to the WMPO QA (QASC-Audits and Surveillance Branch Manager) a copy of purchase documents and changes thereto, as issued, when purchases involve QA Level I items or services. An example is Requisition No. 9380-1053, which has been determined to be for a QA Level I activity.

10 Recommended Actions (continued)

identical and/or similar deficiencies noted in this SDR.

3. Identify the actions to be taken to identify the cause of the conditions and what will be done to prevent recurrence.
4. Determine the impact of this deficiency on the quality of any work performed.

14. Remedial/Investigative Action(s) (continued)

level management in the development of either a Project Plan or individual unit procedures delineating the procurement process.



United States Department of the Interior



GEOLOGICAL SURVEY
BOX 25046 M.S. 425
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

WBS #: 1.2.9.3
QA: "QA"
June 23, 1989

IN REPLY REFER TO:

Carl P. Gertz
Project Manager
Yucca Mountain Project Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas, NV 89193-8518

ATTENTION: E. L. Willmot, Acting Project Quality Manager

SUBJECT: AMENDED RESPONSE TO STANDARD DEFICIENCY REPORT (SDR) 135

REFERENCE: James Blaylock letter to Larry R. Hayes, dated May 23, 1989, subject: YMPO Project Office Evaluation of the Response to SDR 135, and USGS CAR-88-01

Dear Carl:

An amended response to the subject SDR is enclosed which addresses item 6 of the referenced correspondence. The USGS has a concern with items 1 through 5 as explained below. A review of our notes from the March 21, 1989 meeting between USGS personnel and DOE Project Office on the acceptability of the response, indicates the referenced correspondence is not in agreement with the agreements made at that meeting.

Item 1: The USGS does not see the wisdom of correcting each specific deficiency identified within each of the CAR source deficiency documents. A justification for this decision was contained in the CAR response and is repeated here for emphasis.

"The Quality Assurance Office will review the current service contracts providing QA level I or II support to the Yucca Mountain Project to determine QA adequacy of the contractual provisions. This action is comprehensive enough to include all procurement transactions for which a modification to an existing contract may be used as a remedial action for inadequate contractual provisions. Completed procurement transactions (both service and items) are specifically excluded. The ultimate purpose of the QA controls on procurements is to assure that proper provisions are included in QA level I and II procurements to assure that the item or service meets the needs of the Yucca Mountain Project. Whether all applicable provisions were included in a procurement or not is immaterial after the procurement is complete; the procurement process cannot be used as a positive instrument to correct deficiencies in these prior procurements. The adequacy of the item or service itself,

rather than the adequacy of the procurement documents is the relevant point. Use of these purchased items and services are subject to other controls of the QA Program (calibration, special handling, scientific and engineering software, nonconformance reports, scientific investigation close-out, records review, technical reviews, surveillances and audits)."

Furthermore, the Project Office current position is that all work to date is subject to AP-5.9Q for qualification before it can be used to directly support licensing. This Project-level position further supports the USGS decision not to retro-fit all deficient procurement documents but only those that are still pertinent.

Item 2: The USGS has performed a detailed analysis of the deficiencies and identified the root causes of the procurement deficiencies. These root causes were identified as: lack of awareness of the procedures, infrequent use of the procedures, inadequate training, and inadequate control over the Administrative Division. A decentralized organization was not one of the identified root causes. The Project Office has provided no evidence for its "feelings" that decentralized organization was the root cause.

However, regardless of whether it was a root cause, the corrective action commitments within the CAR response (pp. 2-3, Administrative Changes, I. Administrative Office and II. Procurement Unit of the Administrative Division) already address the description requested in the amended response. The Administrative Offices are limited to one per division and the personnel of the Procurement Unit of the Administrative Division are limited to those who are trained in the procedures and have their position descriptions revised to include YMP duties.

The reference to the Bureau of Reclamation in this context was inappropriate. The Bureau of Reclamation is not a division of the USGS but rather operates at a sub-tier level to the USGS with their own USGS-approved Quality Assurance Program.

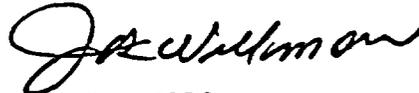
Item 3: This item is substantially the same as item 1. Also there appears to be a typographical error in the fourth sentence. It is assumed that "open" should be replaced by "closed" in order to make the sentence coherent. The USGS is committed to reviewing all open QA level I and II contracts. This is the remedial action that the USGS considers warranted. Again, using the logic explained under item 1, no further action is warranted concerning closed procurement documents.

Additionally, it is deemed unnecessary to initiate individual nonconformance reports on each specific deficiency. The CAR is an upper-level QA deficiency document. If the corrective action commitments for a CAR are sufficiently comprehensive to include the appropriate remedial actions for the source deficiency documents, then the NCRs become redundant. There is no reason to initiate an NCR when the appropriate remedial action commitment already exists.

Item 4: The CAR response stated "The Quality Assurance Manager shall be involved in bid evaluations, solicitations, and changes to procurement documents, as applicable,". This was stated in this manner because the responsibilities for these actions lie directly with the Quality Assurance Manager. No other position has been set up by title to fulfill these duties, however the Quality Assurance Manager can delegate the authority to fulfill his duties to his staff members, as appropriate. The QA Manager's ability to manage the QA Program is not an issue relevant to the response to this SDR.

Item 5: The root cause of the violation of the approved vendor's list was identified by the CAR response as lack of proper procurement document processing. The statement that it was not identified was made within the "analysis of deficiencies" section of the response and must be taken in context. It referred to previous identification already made within the source deficiency documents.

Sincerely,



J.R. Willmon,
Quality Assurance Manager
Yucca Mountain Project

MHM/JRW/aa
Enclosure

cc:

L. R. Hayes, USGS, Denver, Atten: M. Simpson
J. W. Estella, SAIC/T&MSS Project QA Engineering
R. W. Gray, IMD, NV
S. Berkel, IMD, NV
J. J. Brogan
USGS LRC
QA File 3.16.01 USGS-CAR-88-01
QA logbook

AMENDED RESPONSE TO SDR-135

NNWSI-USGS-QMP-4.01 and YMP-USGS-QMP-7.01 have been revised to address the requirements stated within item 6 of the amendment request letter. These revised procedures have already been reviewed and approved. The effective dates are June 23, 1989.



United States Department of the Interior

GEOLOGICAL SURVEY
BOX 25046 M.S. 425
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

WBS #: 1.2.9.3.2
QA: QA

L- 200156
TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

April 30, 1990

Donald Horton, Quality Assurance Director,
Yucca Mountain Project Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas, NV 89193-8518

SUBJECT: UPDATE TO STANDARD DEFICIENCY REPORT (SDR) 135

Dear Don:

The USGS response to SDR-135 refers to an internal USGS Corrective Action Report (USGS-CAR-88-01) for cause, remedial/investigative actions, actions to prevent recurrence. An internal investigation has determined that the essential corrective actions of the 1-13-89 response to USGS-CAR-88-01 are complete with minor modifications. An updated response to the CAR which reflects these modifications has been approved by the CAR Review Board and a copy is enclosed for your information. The CAR is considered ready for verification.

If you have any questions, please call Martha Mustard of my staff at FTS-776-1418.

T.H. Chaney
T.H. Chaney

Horton
W/enc. 12/0
end

MHM/THC/aa

Enclosure

- cc: L.R. Hayes, USGS, Denver, CO
- M.H. Mustard, USGS, Denver, CO
- J.J. Brogan, SAIC, Las Vegas, NV
- R.W. Gray, IMD, NV
- Susan Berkel, IMD, NV
- A.M. Whiteside, SAIC, Golden, CO
- LRC File 3.16.01-3 SDR-135

5/4/90

ACTION _____

SEARCHED _____

SERIALIZED _____

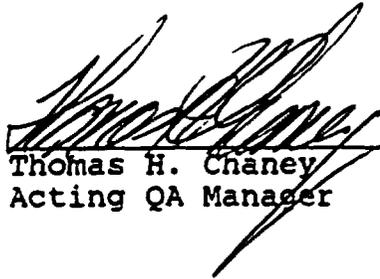
INDEXED _____

FILED _____

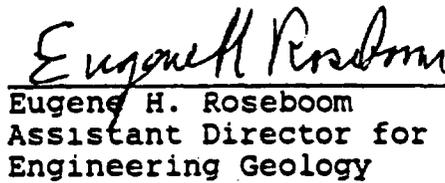
UPDATED RESPONSE FOR CORRECTIVE ACTION REPORT USGS-CAR-88-01

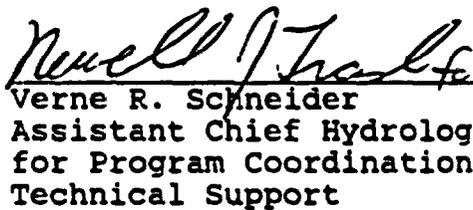
Page 1 of 4

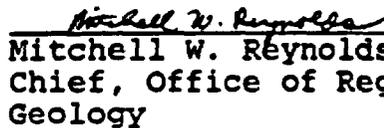
CAR Board approval of the 4-11-90 response update for USGS-CAR-88-01.

 4/11/90
Thomas H. Chaney Date
Acting QA Manager

 4/11/90
Larry R. Hayes Date
Technical Project Officer

 4/23/90
Eugene H. Roseboom Date
Assistant Director for
Engineering Geology

 4/23/90
Verne R. Schneider Date
Assistant Chief Hydrologist
for Program Coordination and
Technical Support

 04.20.90
Mitchell W. Reynolds Date
Chief, Office of Regional
Geology

An investigation was conducted to determine the status and applicability of commitment actions outlined in the 1-13-89 Corrective Action Review Board Management Plan. The investigation determined that the essential corrective actions of the 1-13-89 CAR response are complete with slight modifications, and related remedial actions will be taken as part of the open USGS-NCR-90-09. The modifications are listed below, followed by the status of actions as identified in the 1-13-89 plan. With the noted modifications to the 1-13-89 plan, no other actions are warranted for this CAR.

MODIFICATIONS TO 1-13-89 PLAN:

- o The use of a centralized Administrative Division Procurement Unit is in effect for all QA procurements with the exception of computer and scientific instrumentation procurements over \$50,000. Administrative Division policy requires these procurements to be handled by the Reston office; Central Region Administrative Division handles all other QA procurements for YMP.
- o No changes to position descriptions for Administrative Division procurement personnel handling YMP procurements were considered necessary "to reflect the additional duties assigned to these personnel". The "additional duties" involve 1) coordinating with the QA Office and technical personnel at specified points in the procurement process and 2) providing records management support. These responsibilities do not justify position description amendments.
- o Training for Administrative Division procurement personnel was limited to Central Region Administrative Division Procurement Unit. The Reston Office handles only a very limited number of high-cost procurements which involve coordination with the technical personnel. QA involvement and records management for these procurements can be easily arranged on an individual basis.
- o Review of "current service contracts" as of 1-13-89 is no longer warranted. The contracts were implemented prior to obtaining a qualified QA Program (QAPP-01, R5/5-3-89). Presently, procurement documents generated since 5-3-89 are being reviewed as part of the corrective actions for USGS-NCR-90-09. This comprehensive review will identify procurement-processing problems as well as records management problems, and remedial actions will be taken on a case-by-case basis.

STATUS OF ACTIONS:

ADMINISTRATIVE CHANGES

I. ADMINISTRATIVE OFFICE

The administrative offices for NHP and the Geologic Division have been designated.

II. PROCUREMENT UNIT OF THE ADMINISTRATIVE DIVISION

Central Region Administrative Division Procurement Unit personnel handling Yucca Mountain procurements have been trained. The functional reporting responsibility has been recognized. Resources are deemed adequate at this time to support the YMP-USGS procurement activity. For those procurements being handled by the Reston office, the QA Office coordinates through the technical personnel to assure the required reviews are complete and documented. Limited scope activity and an established means of coordination obviate the need for training for the Reston office procurement personnel.

Position descriptions amendments are no longer deemed necessary for these personnel. They are not limited to just YMP activities, and the training that was conducted is sufficient to provide the awareness needed for coordination or routing of YMP-USGS procurement documents.

QA audits and surveillances of procurement activities continue.

- o Final procurements are not issued without the appropriate QA and technical approvals.
- o The Administrative Division is providing legible, first-generation copies of procurement documents to the administrative offices in NHP and the Geologic Division.
- o The QA Manager is involved in the bid evaluations, solicitations, and changes to procurement documents, as applicable.

III. PROCUREMENT DOCUMENT CHANGES

- A. The Requisition Request form was added to QMP-4.01 and is being used as required.
- B. Proposals are to be evaluated according to the Solicitation Evaluation form (QMP-7.01, R4, Att. 2).

- C. The QA Office documents their review of the final procurement document on QMP-4.01 R3 Attachment 3 prior to issuance by the Procurement Unit.

QUALITY MANAGEMENT PROCEDURE (QMP) CHANGES

QMP-4.01 R3 was issued and became effective 6-23-89.

TRAINING

Necessary classroom instruction and reading assignments were completed for technical personnel, Administrative Division Procurement Unit personnel, Yucca Mountain Project administrative office personnel, and YMP-USGS management personnel.

REVIEW OF PRIOR PROCUREMENTS

The service contracts that were current as of 1-13-89 no longer require a QA review. The deficiencies first identified within this CAR occurred prior to obtaining the qualified QA program (QAPP-01, R5/5-3-89). Presently, procurement documents generated since 5-3-89 are being reviewed as part of the corrective actions for USGS-NCR-90-09. This comprehensive review will identify procurement-processing problems as well as records management problems, and remedial actions will be taken on a case-by-case basis.

ANALYSIS OF DEFICIENCIES

The YMP-USGS Approved Vendors List has been established and continues to be updated and issued as required.

IDENTIFICATION OF ROOT CAUSES

The root causes identified in the 1-13-89 plan were incomplete training and inadequate control of the Administrative Division Procurement Unit by the Yucca Mountain Project. These causes have been addressed by training and continual coordination with Central Region Administrative Division Procurement Unit personnel.

Martha H. Mustard 4-11-90
Martha H. Mustard Date
QA Specialist, QA Office

Ardell M. Whiteside 4-11-90
Ardell M. Whiteside Date
QA Advisor to the YMP-USGS TPO



United States Department of the Interior



GEOLOGICAL SURVEY
BOX 25046 M.S. 425
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

IN REPLY REFER TO:

WBS # 1.2.9.3.2
QA:QA

October 2, 1990

D. G. Horton, Quality Assurance Director,
Yucca Mountain Project Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas, NV 89193-8518

SUBJECT: UPDATE TO STANDARD DEFICIENCY REPORT (SDR)
135
REFERENCE: April 30, 1990 letter from T.H. Chaney, USGS,
to Don Horton, same subject

Dear Don:

The USGS response to SDR-135 refers to an internal Corrective Action Report (USGS-CAR-88-01) for cause, remedial/investigative actions, and actions to prevent recurrence. In the referenced letter, the USGS informed the Project Office that CAR-88-01 had been closed based on an updated response to the CAR and therefore the SDR was ready for verification.

The updated response to the CAR transferred responsibility for the review of procurement documents to an internal nonconformance report (USGS-NCR-90-09). Subsequent discussions with the QA Engineer responsible for SDR-135 indicate that the Project Office considers the review of procurement documents to still be an integral part of the SDR response. Therefore the SDR is not ready for verification yet.

The following excerpt from the supplemental response to USGS-NCR-90-09 constitutes the outstanding commitments for SDR-135.

"Reviews of procurement packages for FY89 are limited to those procurements that were still in process on 5-3-89 or were initiated after 5-3-89. Reviews of such record packages initiated before implementation of QMP-4.01, R3 will address whether appropriate clauses were included in the procurement to address QA requirements and whether the vendor was qualified, if applicable. Procurements initiated after implementation of QMP-4.01, R3 relied on the QA review

OCT 05 1990

Letter to D. G. Horton, October 2, 1990

Page 2

of the requisition request to determine if appropriate QA requirements were included and whether the vendor needed qualification."

The disposition for USGS-NCR-90-09 currently schedules completion of these QA reviews by December 31, 1990.

If you have any questions regarding this update, please contact Martha H. Mustard of my staff or myself at FTS 776-1418.

Sincerely,



D.H. Appel, Quality
Assurance Manager,
Yucca Mountain Project

MHM/DHA

cc: L.R. Hayes, USGS, Denver, CO
D. C. Gillies, USGS, Denver, CO
K. W. Causseaux, USGS, Denver, CO
J. B. Woolverton, USGS, Denver, CO
D. Harris, SAIC, Las Vegas, NV
J.J. Brogan, SAIC, Las Vegas, NV
A.M. Whiteside, SAIC, Golden, CO
R.W. Gray, IMD, NV
Susan Berkel, IMD, NV
LRC file 3.16.01-3 SDR-135
QA logbook

VERIFICATION SDR 135

BLOCK 21, CORRECTIVE ACTION VERIFICATION

Based on the commitments contained in the original USGS Corrective Action Report (CAR) 88-01, issued on June 7, 1988, in response to SDR 135, the amended responses to SDR 135, dated June 23, 1989, April 30, 1990, and October 2, 1990, the Project Office QA staff satisfactorily verified the corrective action for SDR 135, as follows:

Part I Administrative Changes

- A. Verified by review of purchase documents during Surveillance YMP-SR-90-038 of USGS, that the Central Region Administrative Division processes all QA procurements for the Yucca Mountain Project, except for computer and scientific instrumentation procurements over \$50,000, which are processed by the Reston, Virginia office.

Part II Training

- A. Verified during the YMQAD Audit 91-5 of USGS that Technical, Administrative, and Management and/or their delegates, personnel were trained on QMPs 1.01, 2.02, 3.02, 4.01, 6.01, 7.01, 15.01, 16.01, 17.01, 18.01 and 18.02 current revisions, as designated on the USGS Training Matrix. The following personnel were examined:

Martha Mustard
A. H. Handy
James Arnold
L. Cryer
J. Henderson
R. Lucky

- B. Audit 91-5 of USGS Training and Qualification of Personnel resulted in only one CAR (YM-91-50) being issued against the qualification of a technical person. The training of personnel was satisfactory.

Part III Procurement Procedure Changes and Review of Prior Procurement Documents

- A. Verified Quality Management Procedure (QMP) 4.01, Paragraph 5.1, was revised to include a Requisition Request (Attachment I) which documents the procurement request, technical and QA reviews, and approvals prior to initiating a requisition.
- B. Verified QMP-7.01, Paragraphs 5.2.2 and 5.2.3, contain the requirements for QA review of bid evaluations.
- C. Verified QMP-4.01, Paragraph 5.4.1, requires QA to document their review of the final procurement document prior to issuance by the procurement unit.

- D. Verified that procurement documents generated subsequent to May 3, 1989, were reviewed by USGS in accordance with the corrective action specified by USGS NCR 90-9, as evidenced by letter from Martha Mustard to Acting QA Manager, Subject: Completion of Action for NCR 90-09 on Procurement Records, dated 4/10/91. The letter included enclosures, 1) Guidelines for review of each topic, 2) NCR 90-09 Review Form Checklist and 3) A matrix summary of the results of the review to satisfy the proposed corrective action for USGS NCR 90-09.
- E. Verified 485, Procurement Requisition Packages were reviewed and the results documented on the summary of review results for NCR-90-09. A total of 121 procurement packages were documented as deficient on three separate USGS NCRs 91-25, 26, and 27, and are being dispositioned by USGS.
- F. Verified by review of the Guidelines for Review (Checklist Item 6) and Summary of Review Results (Matrix), that the suppliers of current (open) procurement documents for quality-affecting items and services were qualified, except for Purchase Requisition 9-4889-5426 which was previously resolved through USGS NCR 90-24.

Verified during YMQAD surveillance of USGS, YMP-SR-91-012, by sample of Level I procurement document currently open, that the suppliers were on the approved vendors list. Purchase Orders used to verify the suppliers were on the approved vendors list were: 140022-91, 140041-91, 140038092, 140050-91, 140063-91, 140003-91.

- G. Verified during YMQAD surveillance of USGS, YMP-SR-91-012, by sampling that procurement documents processed subsequent to May 3, 1989, were provided to the USGS Local Records Center after completion of the review. The following purchase order packages were reviewed for final USGS QA review, inclusion of QA requirement, completeness, and legibility; POs 140022-91, 140041-91, 140038-91, 140050-91, 140063-91, 140003-91, 140144-91, and 140082-91.

Donald J. Harris
6/5/91