BOB MILLER Governor STATE OF NEVADA

ROBERT R. LOUX Executive Director



AGENCY FOR NUCLEAR PROJECTS NUCLEAR WASTE PROJECT OFFICE

Capitol Complex Carson City, Nevada 89710 Telephone: (702) 687-8744 Fax: (702) 687-5277

MEMORANDUM

TO: Distribution

FROM: Susan Zimmerman SUF

DATE: October 4, 1991

SUBJECT: NRC QA Audit of USGS

On September 16-20, 1991, I observed the Nuclear Regulatory Commission (NRC) quality assurance audit of the United States Geological Survey at the Nevada Test Site and in Denver, Colorado. The audit focused on the potentiometric water level monitoring study for the Yucca Mountain site.

The Audit Process

The audit team consisted of a lead auditor, auditor and a technical specialist. The management at NRC, when asked through an observer inquiry form about the qualifications of the lead auditor, stated that management had determined that the lead auditor and auditor were qualified to perform this audit. However, they did not give any criteria by which this determination was made. The lead auditor did state to me that it had been approximately three years since he last performed an audit, but there is no requirement for the NRC to certify their lead auditors to any standard for this program. After talking to the lead auditor, determining his background, and then, observing him perform the audit, it did appear that he was qualified to lead the audit. The auditor and the technical specialist also performed well.

One concern I did have with the audit was the activity chosen to be audited. The potentiometric water level monitoring activity has been extensively audited over the past 4-5 years by DOE and these audits have been, for the most part, observed by the NRC staff.

9110160219 911004 PDR WASTE WM-11 PDR

ADD: Ken Hooks LAr.

There were not too many problems found during the last audits of this activity. With the other, more recent activities that have happened at the site, it seems to me that an activity such as the Midway Valley trenching or the Calcite/Silica (Trench 14) activity might have been more appropriate to audit. I realize that the decision on which activity to audit is made at an early date, but even so, a less audited activity could have given a better picture of the overall USGS program.

3

The Audited Activity

. . .

USGS appears to have this activity well in hand. The recurrent transducer problems in the past seem to have been alleviated, for the most part. The use of the data collection platforms seems to have corrected most of the problems and offers more accurate readings. I was somewhat concerned with the status of the scientific notebook for the activity. After using the data collection platforms for more that a year, there still was not a clearly designated procedure for collecting the data. This was corrected during the audit by Dick Luckey by describing the procedure more clearly in the notebook. However, I would suggest that more extensive notes are kept on exactly what is being done on this activity to avoid similar problems in the future.

The USGS staff assigned to this project appeared well versed in the requirements and were very helpful during the audit.

Distribution

<u> .</u>

æ

• •

2.

Ken Hooks, QA Project Manager Division of High-Level Waste Management U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Don Horton Director, Quality Assurance OCRWM U. S. Department of Energy Washington, D.C. 20585

Jim Conway Audit Team Leader Division of High-Level Waste Management U.S. Nuclear Regulatory Commission Washington, D.C. 20555

· ··