

FEB 10 1992

Mr. John P. Roberts, Acting Associate Director
for Systems and Compliance
Office of Civilian Radioactive Waste Management
U.S. Department of Energy, RW 30
Washington, D.C. 20585

Dear Mr. Roberts:

SUBJECT: EVALUATION OF U.S. GEOLOGICAL SURVEY (USGS) RESPONSES TO
DEFICIENCIES FROM U.S. NUCLEAR REGULATORY COMMISSION (NRC) AUDIT
NRC-91-01

Dear Mr. Roberts:

The U.S. Department of Energy, Office of Civilian Radioactive Waste Management (OCRWM) letter dated December 24, 1991, from you to J. Holonich of the NRC, transmitted the USGS responses for the deficiencies identified during NRC Audit NRC-91-01. Although it is not explicitly stated in your letter, the NRC staff has verified by telephone (K. Hooks to R. Clark, January 28, 1992) that OCRWM has evaluated, and concurs with, the USGS responses.

The NRC letter which issued Audit Report No. NRC-91-01 and the accompanying Notice of Deficiency (J. Linehan to J. Roberts dated November 12, 1991), requested that OCRWM respond in writing to the four deficiencies within 45 days, and for each deficiency, identify: (1) the actions taken or to be taken to correct the deficiency and prevent recurrence; (2) a determination of the root cause of the deficiency; and (3) the dates by which the corrective actions and preventive measures were or will be completed. The NRC staff has reviewed the responses to the four deficiencies transmitted by your December 24, 1991, letter and has determined that OCRWM has satisfied our request .

The NRC staff evaluation of the root causes identified for the deficiencies and the corrective actions taken to resolve these deficiencies has determined that the identification of the causes, and the corrective actions, are adequate. However, attribution of the cause of three of the four deficiencies to "oversight", while correct, may indicate a need for additional familiarization with procedural requirements on the part of field personnel, or evaluation of the need for certain procedural requirements. The NRC staff position is that the requirements of quality-related procedures should be followed, or the reasons for not following the procedures should be properly documented at the time the decision is made. Unnecessary requirements should be eliminated from the procedure.

Concerning the cause identified for the fourth deficiency, which is related to the USGS Scientific Notebook System, the NRC staff agrees that the deficiency is based on interpretation of the level of detail required. However, the intent of the requirement, from the NRC staff perspective, is to protect and preserve the integrity and value of the data recorded in the notebooks in the

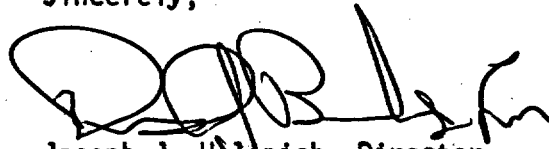
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face of the passage of time and critical review, and to ensure that all users of that data can readily understand it. We believe that USGS personnel should be deliberately conservative in meeting such requirements.

In summary, the NRC staff has evaluated and accepts the OCRWM/USGS responses to the four deficiencies identified in Audit NRC-91-01. Please contact Ken Hooks at (301)504-0447 if you have any questions concerning this letter.

Sincerely,



Joseph J. Holonich, Director
Repository Licensing and Quality
Assurance Project Directorate
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

- cc: R. Loux, State of Nevada
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