



Department of Energy  
Yucca Mountain Site Characterization  
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Las Vegas, NV 89193-8608

WBS 1.2.9.3  
QA

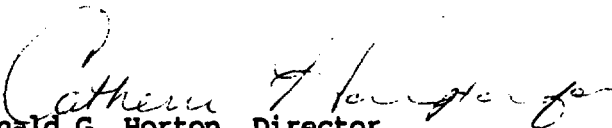
APR 10 1991

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) 556, REVISION 0, RESULTING FROM  
YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION AUDIT 90-03 OF U. S. GEOLOGICAL  
SURVEY

SDR 556, 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 either Catherine E. Hampton at  
794-7973 or James E. Clark at 794-7748.

  
Donald G. Horton, Director  
Yucca Mountain Quality Assurance Division

YMQAD:CEH-3177

Enclosure:  
SDR 556, Revision 0

cc w/encl:  
K. R. Hooks, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
T. H. Chaney, USGS, Denver, CO  
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  
WM-11 PDR

FULL TEXT ASCII SCAN

add: K Hooks

Ltr. Encl.

102.7  
WM-11  
NH03

**YMPO STANDARD DEFICIENCY REPORT**

N-QA-038  
4/89

Completed by Originating QA Organization	1 Date June 28, 1990		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 2
	3 Discovered During Audit 90-03		3a Identified By James E. Clark		4 SDR No. 556 Rev. _____
	5 Organization USGS		6 Person(s) Contacted Jim Ziemba		7 Response Due Date is 20 Working Days from Date of Transmittal
	8 Requirement (Audit Checklist Reference, If Applicable) QMP-16.01, Revs. 2 & 3 Section 1 states that the procedure is to establish a system for identifying, determining the cause and providing corrective action				
Completed by Organization in Block 5	9 Deficiency Contrary to the requirements cited, on at least three occasions Corrective Action Reports (CARs) were not initiated to document recurring conditions adverse to quality, or potentially adverse to quality, identified in the				
	10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective				
	11 QAE/Lead Auditor/Date J E Clark 7/16/90		12 Division Manager/Date N/A		13 Project Quality Mgr./Date Anthony Hampton 7-17-90
Completed by Organization in Block 5	14 Remedial/Investigative Action(s)  See Attached Response.				
	15 Effective Date _____				
	16 Cause of the Condition & Corrective Action to Prevent Recurrence  17 Effective Date _____				
Comp. by Org. QA Org.	18 Signature/Date [Signature] 8/20/90				
	19 Response Accepted	QAE/Lead Auditor/Date J E Clark 11/16/90	Division Manager/Date N/A	Project Quality Mgr./Date Anthony Hampton 11/20/90	
	20 Corrective Action Verif. Satisfactory	QAE/Lead Auditor/Date C. W. [Signature] 4-3-91	Division Manager/Date N/A	Project Quality Mgr./Date Anthony Hampton 4/14/91	
	21 Remarks Response, Hayes to Horton, 8-20-90 Request Amended Response 10/5/90 - QA:CEH-153 Request Response Extension 10/16/90 - Hayes to Horton - Accepted 11/6/90 - QA:CEH-684 Request Response Extension 10/29/90 - Hayes to Horton - Accepted 11/7/90 - QA:CEH-723 Amended Response 11/8/90 - Hayes to Horton - Accepted YMQAD:CEH-1117 - 12/11/90 Satisfactory Verification 4-3-91 C. W. [Signature]				
	22 QA CLOSURE	QAE/Lead Auditor/Date C. W. [Signature] 4-3-91	Division Manager/Date N/A	PQM/Date Anthony Hampton 4/14/91	

ENCLOSURE

**YMPO STANDARD DEFICIENCY REPORT  
CONTINUATION SHEET**

**N-QA-038  
2/89**

**SDR No. 556**

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**8 Requirement ( continued )**

for significant or recurring conditions adverse to quality or potentially adverse to quality, that include but are not limited to a breakdown of the USGS QA program and repetitive nonconformances.

QMP-16.01, Revs 2 & 3 Section 5.1.1 states in part "Any USGS personnel or USGS contractor personnel that observe a condition adverse to quality or potentially adverse to quality, are responsible for initiating a Corrective Action Report (CAR) and for notifying immediate and upper levels of management of the adverse condition."

**9 Deficiency ( continued )**

September and November 1989 Trend Analysis Reports, and the March 1990 Trend Analysis Report.

USGS RESPONSE TO YMPO STANDARD DEFICIENCY REPORT (SDR) NO. 556

Page 1 of 1

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

No remedial or investigative actions are warranted.

BLOCK 15: EFFECTIVE DATE: Not applicable.

BLOCK 16: CAUSE OF THE CONDITION & CORRECTIVE ACTION TO PREVENT RECURRENCE:

When the USGS initiated the trend analysis program through QMP-16.03, the effect on implementation of QMP-16.01 was not realized. The intent was to identify trends and potential trends within the scope of QMP-16.03. A CAR would be initiated through QMP-16.01 only when a trend adverse to quality was identified which required management action.

QMP-16.01 will be changed to reflect the actual practice.

BLOCK 17: EFFECTIVE DATE: October 1, 1990 - Change QMP-16.01.

USGS AMENDED RESPONSE TO YMPO SDR 556

Page 1 of 2

This response is intended to replace the 8-20-90 response.

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

The conditions identified as potential adverse trends in the September 1989 and March 1990 Trend Analysis Reports were investigated. Issuance of a CAR was not warranted because they do not involve recurring conditions. However, the deficiencies cited in the November 1989 (and later the July 1990) Trend Analysis Reports were indeed recurring conditions, and USGS-CAR-90-02 was initiated.

BLOCK 15: EFFECTIVE DATE:

USGS-CAR-90-02 was originated on September 6, 1990.

BLOCK 16: CAUSE OF THE CONDITION & CORRECTIVE ACTION TO PREVENT RECURRENCE:

There is a disconnect between the requirements in QMP-16.01 and 16.03:

QMP-16.01, Corrective Action Reports, currently requires a CAR to be originated if there is a significant or recurring condition adverse to quality or potentially adverse to quality, whereas QMP-16.03, Trend Analysis, requires identification of both trends and potential trends, however it only requires a CAR to be originated if a condition adverse to quality exists.

The wording of QMP-16.01, Control of Corrective Action Reports, will be changed to allow the investigation of conditions potentially adverse to quality or recurring conditions potentially adverse to quality without the initiation of a CAR until the condition is determined to be significant and/or adverse to quality.

Additionally, QMP-16.03 will be changed to reflect the required documentation and evaluation process for potentially adverse trends and potentially adverse recurring conditions identified during Trend Analysis.

Intrinsic to these QMP changes will be a clearer distinction among the terms involved, such as recurring condition, significant condition adverse to quality, potentially adverse trend, potential trend, and potentially adverse to quality.

*Ltr dtd 11/8/90 - Hayes to Norton*

USGS AMENDED RESPONSE TO YMPO SDR 556  
PAGE 2 OF 2

BLOCK 17: EFFECTIVE DATE:

February 28, 1991 - Changes to QMP-16.01 and QMP-16.03  
effective.

BLOCK 18: SIGNATURE/DATE:

 11/8/90

VERIFICATION ACTIVITIES FOR SDR 556

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S)

In accordance with the accepted amended response to SDR 556, it was verified that USGS-CAR-90-02 was initiated on 9-11-90 to document recurring conditions from the July, 1990 Trend Analysis Report.

BLOCK 16: CAUSE OF THE CONDITION & CORRECTIVE ACTION TO PREVENT RECURRENCE

Although the accepted amended response to SDR 556 stated that QMP-16.01, Control of Corrective Action Reports, would be changed to allow the investigation of conditions potentially adverse to quality or recurring conditions potentially adverse to quality without the initiation of a CAR, this change was actually documented in Modification M1 to QMP-16-03, R3, Trend Analysis. This change should be effective since all USGS deficiency documents are reviewed in accordance with QMP-16-03.

Additionally, as stated in the response, QMP-16-03 was changed to reflect the required documentation and evaluation process for potentially adverse trends/recurring conditions identified during trend analysis. This change is documented in Modification M1 to QMP-16-03, R3.

C.C. Warren 4-3-91

C. C. WARREN