

JUN 23 1992

Mr. John P. Roberts, Acting Associate Director  
for Systems and Compliance  
Office of Civilian Radioactive Waste Management  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, D.C. 20585

Dear Mr. Roberts:

SUBJECT: OBSERVATION OF AUDIT OF THE U.S. GEOLOGICAL SURVEY

I am transmitting the U.S. Nuclear Regulatory Commission Observation Audit Report No. 92-10 for the U.S. Department of Energy, Office of Civilian Radioactive Waste Management (OCRWM), Yucca Mountain Quality Assurance Division (YMQAD) Quality Assurance (QA) Audit No. YMP-92-13 of the U.S. Geological Survey (USGS). This audit was conducted at the Nevada Test Site from April 1-2, 1992, and in the USGS offices at the Denver Federal Center from April 6-10, 1992. The audit scope included seven programmatic elements and seven technical areas.

The NRC staff evaluated the YMQAD audit to gain confidence that YMQAD and the USGS are properly implementing the requirements of their QA programs. The NRC staff based its evaluation of the YMQAD audit process and the USGS QA program on direct observations of the auditors, discussions with the audit team, USGS and contractor personnel, and reviews of pertinent audit information (e.g., audit plan, checklists, and USGS documents).

The NRC staff has determined that YMQAD Audit No. YMP-92-13 was well organized and conducted in a thorough and professional manner. The audit team members were well qualified in the QA and technical disciplines, and their assignments and checklist items were, for the most part, adequately described in the audit plan.

The NRC staff agrees with the preliminary YMQAD audit team findings that the USGS QA program has adequate procedural controls in place, and program implementation is generally adequate, in six of the programmatic areas and six of the technical areas audited. Scientific Investigation Control was determined to be implemented ineffectively due to deficiencies previously identified by the USGS in an audit of activities associated with Technical Activity 8.3.1.2.2.6.1, "Gaseous Phase Circulation Study." Three preliminary Corrective Action Requests were issued by the YMQAD audit team. The deficiencies identified by the YMQAD audit team are not significant in terms of the overall QA program.

OCRWM should continue to monitor USGS QA program implementation to ensure that the deficiencies identified during this audit are corrected in a timely manner and future implementation is carried out in an effective manner. The NRC staff expects to participate in this monitoring as observers and may perform its own independent audit at a later date to assess the USGS QA program.

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A written response to this letter or the enclosed report is not required. If you have any questions, please contact Mr. Ken Hooks on (301) 540-2447.

Sincerely,

*JS/*

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

Enclosure: As stated

- cc: R. Loux, State of Nevada
- T. J. Hickey, Nevada Legislative Committee
- C. Gertz, Doe/NV
- S. Bradhurst, Nye County, NV
- M. Baughman, Lincoln County, NV
- D. Bechtel, Clark County, NV
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- P. Niedzielski-Eichner, Nye County, NV
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