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NUCLEAR WASTE PROJECT OFFICE**

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July 18, 1994

Don Horton
Director, Quality Assurance
OCRWM-YMPO
U.S. Department of Energy
P.O. Box 98608
Las Vegas, Nevada 89193

Dear Mr. Horton:

This letter deals with the recent DOE QA audit of the USGS on June 20-24, 1994. Unfortunately, I was not able to observe this audit because of a schedule conflict with another audit. However, after reviewing the Corrective Action Requests (CARs) generated during this audit and discussing the results of the audit with Charlie Warren, the Audit Team Leader, I felt compelled to write to you to express my concerns. I was disturbed to see the significant CARs regarding Criteria 4 and 16. Given the length of USGS involvement in the waste program, it is surprising to me that problems of this magnitude were discovered. It also makes me wonder if triennial audits will be sufficient to allow the timely discovery of significant problems such as these.

I am also concerned about CAR number YM-94-043 from this audit. This CAR deals with the lack of appropriate QA controls placed on an activity associated with Study Plan 8.3.1.17.4.12, Tectonic Modeling and Synthesis. It is my understanding, from discussions with Jim Blaylock, the auditor that discovered the problem, that the investigators associated with this activity did not develop technical procedures to govern their activities or, as the alternative, did not use the Scientific Notebook procedure to document their activities. And, it is my understanding that an outside contractor was used for this activity without any QA controls whatsoever. According to the CAR, the grading report for this work, YMP-USGS-ACS-G12328412-2, Rev.0, graded the requirement as not applicable to the activity. Again, with the maturity of the USGS program, it is surprising to me that the USGS QA department allowed this to occur. I understand that the grading report was an internal USGS grading report that DOE did

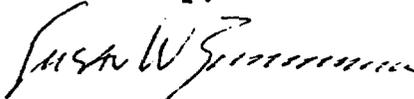
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not review. However, this leads to even further concern that more cases of activities inappropriately graded could exist and will not be easily discovered by DOE QA because of internal grading that precludes these activities from be audited as quality-affecting. This could also be occurring at other DOE contractors. How will DOE QA prevent other activities that are not appropriately graded from slipping through the audit program until, potentially, the activity is completed? Will performance-based audits on selected activities be sufficient?

Thank you for allowing me to express my concerns. I would like to discuss this matter further with you. I will be in Las Vegas next week for the M&O performance-based audit and would be available to meet with you during the week at your convenience. Please let me know if this would be acceptable.

Sincerely,



Susan W. Zimmerman
QA Manager

✓ cc: Malcolm Knapp, NRC