



AGENCY FOR NUCLEAR PROJECTS  
NUCLEAR WASTE PROJECT OFFICE

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*As of 7/17/92  
• Not in index  
• BJT to JH*

April 22, 1992

Mr. Carl Gertz, Program Manager  
Yucca Mountain Project Office  
U.S. Department of Energy  
P.O. Box 98608  
Las Vegas, Nevada 89193-8608

Dear Mr. Gertz:

At the DOE quality assurance audit of the USGS performed April 6-10, 1992, it was revealed that scientists outside the Yucca Mountain Project were doing research on the mountain, including taking samples. Specifically, a scientist from Southern Methodist University and a USGS-National Research Project scientist from Reston, Virginia have been regularly accessing the site and performing research activities, in support of the Unsaturated-Zone Gaseous Phase Movement Study Plan (Study 8.3.1.2.2.6). However, at the audit, there was no documentation presented to indicated that this work is covered under the USGS quality assurance program. Additionally, it was stated that these scientists do not obtain permission through the USGS-YMP to access the site. An obvious conclusion is that the USGS-YMP does not seem to have control of this work that is in support of a Yucca Mountain study plan. A number of questions logically follow: How are these scientists obtaining access to the site? Who is authorizing this access? Does DOE-YMP have knowledge of these activities? If this work is in support of a Yucca Mountain study plan, why isn't it performed under a qualified QA program?

From discussions during the audit, there is a strong likelihood that much work has already been performed relative to this study plan, outside the USGS-YMP QA program. It is a reasonable assumption that work will have to be re-performed in order to obtain data that can be used in licensing. Are there other instances in the DOE Yucca Mountain program where site investigations are being performed by personnel outside the Yucca Mountain project that directly support a study plan? If so, what

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BACKUP INFORMATION

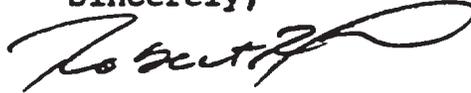
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are the plans to qualify this work? If this is not an isolated case, does this reflect a program attitude toward less adherence to QA requirements?

The State has been concerned with adherence to quality assurance requirements for the program since 1983 and has reservations about the Department and its contractors' commitment to a nuclear-level, quality assured scientific study. Your prompt response to this letter including a commitment to corrective action is appreciated.

Sincerely,



Robert R. Loux  
Executive Director

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

Mr. Joe Youngblood, Director  
Nuclear Regulatory Commission  
High-Level Waste Management Division  
Washington, D.C. 20555