



Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
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QA: L

AUG 16 1994

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

**EVALUATION OF RESPONSES TO CORRECTIVE ACTION REQUEST (CAR)
YM-94-048 AND CAR YM-94-049 RESULTING FROM YUCCA MOUNTAIN QUALITY
ASSURANCE DIVISION (YMQAD) AUDIT YMP-94-06 OF U.S. GEOLOGICAL
SURVEY (SCPB: N/A)**

The YMQAD staff has evaluated the responses to CARs YM-94-048 and YM-94-049. The responses are not acceptable in that they do not adequately address the issues identified in each of the CARs.

The response to YM-94-048 is broad and general; as such, the reviewer does not have a clear understanding of the actions proposed, the specific elements associated with the proposed corrective actions, and the dates by which the technical procedures will be revised to meet the Quality Assurance Requirements Document requirements.

The response to YM-94-049 commits to a review of the published trend reports. A commitment is also required to reevaluate data for trends once trending has been defined and criteria has been developed for conducting trend analysis.

Amended responses are required to be submitted to this office within ten working days of the date of this letter. Send the original of your responses to Deborah Sult, YMQAD/QATSS, 101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109. If an extension to the due date is necessary, it must be requested in writing, with appropriate justification, prior to that date.

If you have any questions, please contact either Robert B. Constable at 794-7945 or James Blaylock at 794-7913.

Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-4679

Enclosure:
CARs YM-94-048 and
YM-94-049

YMP-5

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PDR WASTE
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Larry R. Hayes

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AUG 16 1994

cc w/encl:

~~R. B. Johnson~~ NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
T. H. Chaney, USGS, Denver, CO
R. W. Craig, USGS, Las Vegas, NV
D. D. Porter, SAIC, Golden, CO

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV
D. G. Sult, YMQAD/QATSS, Las Vegas, NV

**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

8 CAR NO.: YM-94-04E
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CORRECTIVE ACTION REQUEST

1 Controlling Document YMP-USGS-QMP-18.01, Rev. 4		2 Related Report No. YMP-94-06	
3 Responsible Organization USGS		4 Discussed With T. CHANEY	
5 Requirement: YMP-USGS-QMP-8.01, R4 contains the QARD requirements for identification and control of samples.			
6 Adverse Condition: The QMP-8.01, R4 requirements have not been fully incorporated into many of the implementing technical procedures and scientific notebooks. Two examples of procedures not being updated to QMP-8.01, R4 are HF-200, R0 and HF-249, R0.			
9 Does a Significant Condition Adverse to Quality exist? Yes ___ No <u>X</u> If Yes, Circle One: A B C D E		10 Does a stop work condition exist? Yes ___ No <u>X</u> ; If Yes - Attach copy of SWO If Yes, Circle One: A B C	
3 Response Due Date: <u>20 WORKING DAYS</u> <u>FROM ISSUANCE</u>			
11 Required Actions: <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Extent of Deficiency <input checked="" type="checkbox"/> Preclude Recurrence <input type="checkbox"/> Root Cause Determination			
12 Recommended Actions: 1. Incorporate the QMP 8.01 requirements in the implementing documents. 2. Review the myriad of sample control procedures to identify interfaces and sequencing. 3. Remove what may be extraneous procedures.			
7 Initiator J. BLAYLOCK <i>C. C. Wanner for</i> <i>6-30-94</i>		14 Issuance Approved by: <i>[Signature]</i> for Date <u>7-4-94</u>	
15 Response Accepted QAR _____ Date _____		16 Response Accepted QADD _____ Date _____	
17 Amended Response Accepted QAR _____ Date _____		18 Amended Response Accepted QADD _____ Date _____	
19 Corrective Actions Verified QAR _____ Date _____		20 Closure Approved by: QADD _____ Date _____	

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WASHINGTON, D.C.**

8 CAR NO.: YM-94-049
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CORRECTIVE ACTION REQUEST

1 Controlling Document QARD, Rev. 0	2 Related Report No. YMP-94-06
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3 Responsible Organization USGS	4 Discussed With T. CHANEY
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5 Requirement:
Section 5.2.2.D of the QARD states, in part: 'Implementing documents shall include the following information as appropriate to the work to be performed: D. Quantitative or qualitative acceptance criteria sufficient for determining that activities were satisfactorily accomplished.'

6 Adverse Condition:
QMP 16.03, R3, provides no criteria as to what constitutes a trend, hence the rationale and conclusions of the trend reports for the time periods 10/1/93 - 12/31/93 and 1/1/94 - 3/31/94 are not substantiated by the information provided.

9 Does a Significant Condition Adverse to Quality exist? Yes ___ No <u>X</u> If Yes, Circle One: A B C D E	10 Does a stop work condition exist? Yes ___ No <u>X</u> ; If Yes - Attach copy of SWO If Yes, Circle One: A B C	3 Response Due Date: <u>20 WORKING DAYS</u> <u>From T. CHANEY</u>
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11 Required Actions: Remedial Extent of Deficiency Preclude Recurrence Root Cause Determination

12 Recommended Actions:
1. Provide qualitative criteria in QMP 16.03.
2. Change the definition of adverse condition to be consistent with the QARD glossary.
3. Substantiate the trend reports for the time frame identified above.

7 Initiator J. BLAYLOCK <i>C. C. Wynn for</i> 6-30-94	14 Issuance Approved by: QADD <i>[Signature]</i> Date <u>7-1-94</u>
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15 Response Accepted QAR _____ Date _____	16 Response Accepted QADD _____ Date _____
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17 Amended Response Accepted QAR _____ Date _____	18 Amended Response Accepted QADD _____ Date _____
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19 Corrective Actions Verified QAR _____ Date _____	20 Closure Approved by: QADD _____ Date _____
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