

U.S. DEPARTMENT OF ENERGY
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
OFFICE OF QUALITY ASSURANCE

AUDIT REPORT

OF

UNITED STATES GEOLOGICAL SURVEY

DENVER, COLORADO

AUDIT NUMBER YM-ARP-95-09
MAY 8 THROUGH 12, 1995

Prepared by: Donald J. Harris Date: 6/5/95
Donald J. Harris
Audit Team Leader
Yucca Mountain Quality
Assurance Division

Approved by: Donald G. Horton Date: 6/8/95
Donald G. Horton
Director
Office of Quality Assurance

1.0 EXECUTIVE SUMMARY

As a result of performance based Quality Assurance (QA) Audit YM-ARP-95-09, the audit team determined that the United States Geological Survey (USGS) is not satisfactorily implementing an effective QA program and process controls for the procurement process and associated activities, e.g., Qualification and Maintenance of Suppliers, Corrective Action process and Audits.

The audit team identified six deficiencies during the audit that resulted in the issuance of two Corrective Action Requests (CAR). CAR YM-95-041 documents the procurement of services from Geometrics Incorporated and PCI Sales by performing source surveillance thus circumventing the requirement to procure services from an organization on the Approved Suppliers List (ASL) or by initial qualification of the supplier. CAR YM-95-042 documents that: 1) two USGS Quality Deficiency Reports (QDR) were closed on the basis of statements from the Principal Investigators (PIs) that the activities were no longer quality related; 2) QDRs were also closed prior to completion of corrective action; 3) failure to include Yucca Mountain Quality Assurance Division (YMQAD) CARs in the trend database; and 4) the Trend Report identification of a trend. However, USGS failed to initiate a QDR or identify any proposed action. There were no other deficiencies identified by the audit team that required correction prior to the postaudit meeting. Additionally, there were four recommendations resulting from this audit which are detailed in Section 6.0 of this report.

The audit team determined that USGS training organization's Yucca Mountain (YM)-USGS training database, which tracks mandatory Yucca Mountain Project (YMP) training and USGS assigned/optional training, demonstrates an excellent practice.

2.0 SCOPE

The audit was conducted to evaluate the effectiveness of USGS controls for performing procurements and related associated activities such as: Qualification and Maintenance of Suppliers, Training, Audits, and Corrective Action with the express goal of closing CAR YM-94-050 which was initiated in June 1994 as a result of Audit YMP-94-06.

The performance based evaluation of process effectiveness and product acceptability was based on:

1. Satisfactory implementation of the procedure critical process steps,
2. use of trained and qualified personnel working effectively,
3. documentation and observations that substantiates the quality of the products;
4. effectiveness of corrective action, and
5. acceptable results and adequate end products.

QA Program Elements/ Requirements

In addition, a sample of the applicable QA program requirements and controls as applied to these processes were examined to evaluate the degree of compliance to the critical process steps. This sample was taken from the following QA program elements:

- 2.0 Quality Assurance Program
- 4.0 Procurement Document Control
- 7.0 Control of Purchased Items and Services
- 16.0 Corrective Action
- 18.0 Audits

3.0 AUDIT TEAM

The following is a list of audit team members and their assigned areas of responsibility:

<u>Name/Title/Organization</u>	<u>QA Program Elements/Requirements, Processes, Activities or End-products</u>
Donald J. Harris, Audit Team Leader (ATL), YMQAD	4.0 and 7.0
Kenneth O. Gilkerson, Auditor, YMQAD	2.0 and 4.0
James Blaylock, Auditor, YMQAD	16.0 and 18.0

4.0 AUDIT MEETINGS AND PERSONNEL CONTACTED

The preaudit meeting was held at the USGS offices in Denver, Colorado, on May 8, 1995. A daily debriefing and coordination meeting was held with USGS YMP management and staff, and daily audit team meetings were held to discuss issues and potential deficiencies. The audit was concluded with a postaudit meeting held at the USGS offices in Denver, Colorado, on May 12, 1995. Personnel contacted during the audit are listed in Attachment 1. The list includes those who attended the preaudit and postaudit meetings.

5.0 SUMMARY OF AUDIT RESULTS

5.1 Program Effectiveness

The audit team concluded that, in general, USGS process controls are not being satisfactorily implemented for all the areas identified in the scope (except for training) of the audit. Procurements and associated activities, identified

as deficient in CAR YM-94-050 as a result of audit YMP-94-06 conducted June 1994, had not been accomplished satisfactorily, e.g., the following corrective action was incomplete:

1. USGS Quality Management Procedure (QMP) 4.01, Revision 7, USGS QMP-4.02, Revision 6, and USGS QMP 7.04, Revision 2 had not been issued as of May 12, 1995 .
2. The Desert Research Institute (DRI) Quality Program status is currently unresolved in regard to which QA program DRI is working under, USGS or their own. There is no objective evidence that USGS reviewed and approved the DRI QA Program.
3. There are approximately twenty Annual Supplier Evaluations and eight triennial audits of suppliers past due of organizations on the USGS ASL. These suppliers were on the USGS ASL at the time of the previous audit YMP-94-06.
4. The supplier evaluations, which were performed and not finalized by the due date or not completed on time but were subsequently determined to be unqualified due to a lack of a documented QA program, require an impact analysis. The status of the suppliers and circumstances surrounding each was supposed to be addressed in an expedited resolution to QDR 94063. The QDR was closed based on issuance of CAR YM-94-050. Therefore, USGS failed to perform the actions committed to in CAR YM-94-050 or provide documented evidence to resolve this issue.

RESULTS

Performance Based Evaluation of Procurement Process, Quality Assurance Requirements and Description Document (QARD) Section 2:0

Training:

The training of USGS personnel in the procurement process was evaluated through the interviews of cognizant personnel that initiated, reviewed and approved procurement documents; the review of training records; and, the evaluation of training procedures. It was determined that the training of USGS personnel to existing procedures has occurred and is well documented. The tracking and statusing of training through a computer database is excellent. However, the value of total reliance on training by reading assignments is not believed to be effective. It was recommended during the audit that other approaches to training be considered, such as "workshop training." It was noted that CAR YM-94-050 has been open almost a year on procurement process

deficiencies and some of these deficiencies still exist. It was further noted that no formal training has occurred on procurement to identify "lessons learned," to clarify U. S. Department of Energy (DOE) objectives, or provide interim direction until the process is acceptable. Training, as defined by USGS procedures, is satisfactory but enhancements or improvements in the process to ensure effectiveness is recommended.

The audit team determined that the USGS training organization's YM-USGS training database which tracks mandatory YMP training and USGS assigned/optional training is an exceptional program and demonstrates an excellent practice.

QARD Section 4.0

Procurement:

USGS procurement process was evaluated to determine effectiveness through interviews of cognizant personnel, examination of procurement documents, and reviews of current procedures. It was found that the procurement process overall still is not being satisfactorily implemented. Some of the problems identified in CAR YM-94-050 still exist. Procedures have not substantially changed in the last year. Although remedial actions have been taken to correct procurement documents, such as adding quality and technical requirements, procedure changes committed to in CAR YM-94-050 to invoke review criteria, and address QARD requirements methodology in the procurement implementing documents, has not been accomplished. Procurements have been issued to unqualified suppliers. There is no system in place for tracking procurement process deficiencies detected during the reviews of the procurement request and subsequent procurement documents, they are resolved by the reviewers. Consequently, without tracking the type and number of deficiencies encountered during the reviews, there is no bases to drive program enhancements or provide additional training to affected personnel.

QARD Section 7.0

Control of Purchased Items and Services:

The audit evaluation and interviews with USGS staff personnel reflected that even though progress was made in resolving the numerous procurement related issues identified in CAR YM-94-050, the unresolved issues directly impacted the results of this audit.

The suppliers that were determined to be unqualified after evaluation or unqualified due to an unacceptable QA program were supposed to be addressed in an expedited resolution to QDR 94063; however, this QDR was closed based on issuance of CAR YM-94-050. In addition, the USGS series of procurement procedures that were to be revised as a result of the CAR YM-94-050 have not been issued.

The QARD requires that the supplier is to be audited after sufficient work to demonstrate the supplier's implementation of its QA program was documented as deficient in CAR YM-94-050, because QMP 7.04, Revision 1, in existence at the time did not address the requirement. Revision 2 which is not effective, does not address the requirement to perform the initial supplier audit due to audits being transitioned to the Office of Civilian Radioactive Waste Management, Office of Quality Assurance.

The USGS evaluates the Certification of Conformance or Calibration during the annual performance evaluation, surveillances, or audits. There are several instances where the Certification of Calibration contain errors that were subsequently documented on QDRs (see Recommendation 3).

The DRI Quality Program status is currently unresolved, there is no definitive documentation as to which QA program DRI is working under, USGS or their own. There is no objective evidence that USGS reviewed and approved DRI QA Program.

The current USGS approved suppliers list contains approximately twenty annual performance evaluations and eight triennial audits past due. These late evaluations and audits were supposed to be addressed in QDR 94063, but the QDR was closed based on issuance of CAR YM-94-050 which is still open. It was noted that USGS has been trying to assure their 1995 designated suppliers are being properly evaluated and qualified. Consequently, those suppliers that are not designated as required for 1995 work are taking a back seat.

Overall QARD Section 7.0, based on the results of this audit and unresolved issued in regards to CAR YM-94-050, remains unsatisfactory.

QARD Section 16.0

Corrective Action:

During the audit, those USGS QDRs relevant to procurement activities were examined. The QDRs generated during Fiscal Year (FY) 1995 were selected and evaluated. The list included QDRs 95004, 95006, 95014, 95015, 95024, 95025, and 95033. In reviewing these QDRs, it was evident that USGS made a concerted effort to close the documents prior to the audit, however, several of the closures were not supported by the documentation packages. For example, QDR 95004 was initiated due to procurement shortcomings, yet was closed based on QDR 95024 that the wire was "off-the-shelf" (commercial grade) product. USGS could not produce a brochure or manufacturer's description of the procured wire that demonstrated that the wire met the QARD 7.2.12 requirement for commercial grade procurement; closure was based

solely on the PI's statement that the product was "off-the-shelf." QDR 95014 detailed unauthorized modification of radiometers by the manufacturer; the QDR was closed based on a statement by the PI that instrumentation use was a non-quality activity. QDRs 95025 and 95033 documented the use of vendors not on the ASL; both involved corrective action to revise USGS QMP 4.01. Although the QDRs had been closed, the USGS QMP had not been approved at the time of audit.

The two Quarterly QA Management Reports (Trend Reports) for FY 95 were also reviewed. The USGS can sort QDRs based on organization, procedure, or Work Breakdown Structure number. This sort appears to omit deficiencies initiated by other organization. As an example, the October through December, 1994, report cited two USGS QDRs against QMP 5.01 for the lack of technical procedure governing quality affecting USGS activities. During that time period there were two open YMQAD CARs for the same reason, although the YMQAD CARs cited QARD Supplement II requirements. These four deficiency documents would have constituted a trend under USGS QMP-16.03, Revision 3. The report for January through March 1995, identified three QDRs against USGS QMP 2.08, identified this as a trend, but then failed to initiate a QDR per the procedural requirement or identify any actions that were taken. Also on this report, two QDRs against QMP 4.01 cited problems with vendors not on the ASL. There was a QDR sorted against QMP 12.01 for the same reason, but the report did not identify a trend. The above discussion for both QDR and trending deficiencies were documented on CAR YM-95-042.

QARD Section 18.0

Audits

USGS is no longer performing audits due to their pending transition to OQA. Consequently, the source verification were examined, since USGS use these in lieu of audits. Several source verification surveillances were examined. Those examined include 95001SV, 95002SV, 95003SV, 95004SV, 95015SV, 95027SV, and 95035SV. A recurring theme of the source verification was the witnessing of services and the procurement of items from sources not on the ASL. For example, 95002SV and 95027SV concerned the calibrations of magnetometers by Geometrix. Geometrix was not on the USGS ASL, and on the 95002 source verification, the checklist was annotated with an unacceptable attribute. This unacceptable attribute was rationalized as being of no consequence since the attribute was "very simple." Other examples of services and items procured from unqualified suppliers include 95001SV, Baski Inc.; 95015SV, North West Welding; and 95035SV, PCI Sales, Inc. This condition adverse to quality was documented on CAR YM-95-041.

Overall, QARD Section 18.0, based on the results of this audit and unresolved issues in regard to CAR YM-94-050, is unsatisfactory.

5.2 Stop Work or Immediate Corrective Actions Taken

There were no Stop Work Orders, immediate corrective actions or related additional items resulting from this audit.

5.3 QA Program Audit Activities

A summary table of audit results is provided in Attachment 2. The details of the audit evaluation, along with the objective evidence reviewed, are contained within the audit checklists. The checklists are kept and maintained as QA Records.

5.4 Technical Audit Activities

No technical products or activities were identified in the Audit Plan or audited during this audit.

5.5 Summary of Deficiencies

The audit team identified six deficiencies during the audit for which two CARs have been issued. No additional deficiencies were identified and corrected prior to the post audit meeting.

Synopsis of deficiencies documented as CARs are detailed below. The CARs have been transmitted to you under an separate letter, number RBC-3315, dated May 18, 1995.

5.5.1 CARs

As a result of the audit, the following CARs were issued:

CAR YM-95-041

Details the use of surveillances to witness calibrations in lieu of maintaining the supplier's qualification and/or in lieu of performing the initial qualification of the supplier.

CAR YM-95-042

USGS QDRs; 1) were closed based only on a statement from the PI; 2) QDR closed prior to completion of the Corrective Action; 3) YMQAD CARs were not included in trend population, consequently no trend was indicated; and 4) Trend Report, January through March 1995, identified a trend, although no subsequent action was initiated for resolution.

5.5.2 Follow-up of Previously Identified CARS

There was one previously issued CAR that was determined to be applicable to the scope of this audit. CAR YM-94-050 was supposed to be ready for verification of completed Corrective Action and was the focal point of this audit. The CAR dealt with many facets of the USGS procurement program. The audit resulted in the issuance of an unsatisfactory verification letter for this CAR.

6.0 RECOMMENDATIONS

The following recommendations resulted from the audit and are presented for consideration by the USGS management.

1. During the audit it became evident that a degree of confusion existed in regards to procurement as related to the Federal Assurance Requirements (FAR) and the QARD. It is recommended that after approval of the USGS procurement related QA procedures that a workshop be conducted for staff members involved in procurement activities. The workshop should provide insight in the requirements of both the FAR and QARD and the methodology prescribed to meet the requirements.
2. During the audit, the examination of QDRs and Nonconformance Report (NCR) reflected a lack of knowledge for the proper dispositioning and corrective action verifications for closure of the deficiency documents. It is recommended that a workshop be conducted as to USGS management expectations for affected staff members as to what constitutes a proper deficiency document disposition and documented verification of the committed corrective action (remedial and corrective action to prevent recurrence).
3. During the audit, the examination of surveillance and audit reports, annual performance evaluations, and QDRs, it became apparent that the calibration certificates contained errors and missing information in which USGS has documented as deficient on QDRs and NCRs. It appears that there is an inattention to detail by the requesting (using) organization. It is recommended that the receipt acceptance of items and services be by other than the requesting organization (independent organizations, e.g., USGS QA).
4. During the audit and interviews with USGS staff members it became apparent that many interpretations of the requirements and what it takes to satisfy the requirements exist. It is recommended that the USGS Management ensures that procedurally the methodology exists that interprets the requirements and defines the process which will result in a consistent process and preclude the users from determining how they intend to satisfy the requirements.

7.0 LIST OF ATTACHMENTS

- Attachment 1: Personnel Contacted During the Audit
- Attachment 2: Summary Table of Audit Results

ATTACHMENT 1

Personnel Contacted During the Audit

<u>Name</u>	<u>Organization/Title</u>	<u>Preaudit Meeting</u>	<u>Contacted During Audit</u>	<u>Postaudit Meeting</u>
Branch, A. H.	USGS/FEC/QAIS	X		X
Burgess-Kohn, K.	USGS/SAIC/Training Coordinator		X	X
Chaney, T.	USGS/QA Manager		X	X
Coburn, C. J.	USGS/SAIC/Training Specialist	X		X
Criger, L.	USGS/ Administration		X	
Gilles, D. C.	USGS/ Team Chief, UZ Studies		X	
Gockel, D.	USGS/QA			X
Greene, H. T.	YMQAD/QATSS/QA Division Manager			X
Hayes, L. R.	USGS/TPO	X		X
Le Cain, G.	USGS/PI		X	
Lykins, A. E.	USGS/QAS	X	X	X
Marden, C.	USGS/SAIC/Auditor	X		
McInroy, L.	USGS/SAIC/QA Verification	X	X	X
Mustard, M. H.	USGS/Hydrologist	X	X	X
Parks, B.	USGS/YMPO/ESIP/Sup. Hydrologist	X	X	
Parks, B.	USGS/Team Chief - Climate		X	X
Porter, D.	SAIC/Contract Manager	X	X	
Rodman, W.	USGS/QA			X
Rodriguez, P.	USGS/SAIC/Auditor	X	X	X
Scavuzzo, R.	USGS/SAIC/QAS	X	X	X
Shearer, P.	SAIC/ESIP/QAIS	X		
Watt, M. L.	USGS/SAIC/Records Coordinator	X	X	X
Whiteside, A.	ESIP/SAIC/QA Implementation Group	X	X	X
Williams, R.	USGS/ESIP Chief			X
Ziamba, J.	SAIC/USGS/QAIS		X	X

LEGEND:

- ESIP . . . Earth Science Investigations Program
- FEC . . . Foothills Engineering Corporation
- QAIS . . . Quality Assurance Implementation Specialist
- QATSS . . . Quality Assurance Technical Support Services
- QAS . . . Quality Assurance Specialist
- SAIC . . . Science Applications International Corporation
- TPO . . . Technical Project Officer
- UZ Unsaturated Zone Studies
- YMPO . . . Yucca Mountain Project Office

ATTACHMENT 2

AUDIT YM-ARP-95-09 DETAIL SUMMARY

QA ELEMENT/ ACTIVITIES	PROCESS STEPS	DETAILS (Checklist)	CAR	CDA	RECOM-MENDATION	ADE-QUACY	COMPL-IANCE	OVER-ALL
2.0 Training	Existence of Training Matrix or System.	Page 2 (2-1)	N	N	N	SAT	N/A	EFF
	Training relative to procurement effective.	Page 2 (2-2)	N	N	N	SAT	N/A	
	Personnel performing procurement trained.	Page 3 (2-3)	N	N	6.0 #1	SAT	N/A	
	Re-evaluation of individual performance.	Page 3 (2-4)	QDR 95-05	N	N	SAT	N/A	
4.0 Procurement	Problems resolved during review of Procurement documents.	Page 4 (4-1)	N	N	N	SAT	N/A	UNSAT
	Final review of procurement documents to verify translation of Purchase Requisition.	Page 4 (4-2)	N	N	N	SAT	N/A	
	Changes reviewed by initiator and QA. How documented?	Page 5 (4-3)	N	N	N	SAT	N/A	
	Do procurement procedures translate requirements into methodology for accomplishing work?	Page 5 (4-4)	YM-94-050	N	6.0, #4	UNSAT	N/A	

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QA ELEMENT/ ACTIVITIES	PROCESS STEPS	DETAILS (Checklist)	CAR	CDA	RECOM- MENDATION	ADE- QUACY	COMPL- IANCE	OVER- ALL
4.0 Procurement	Does QMP 4.01 provide methods for determining which QARD requirements apply to specific procurements?	Page 6 (4-5)	YM-94-050	N	N	UNSAT	N/A	UNSAT
	Does the QMP provide methods for performing QA and Technical reviews and does the form for documenting the reviews reflect appropriate review criteria?	Page 6 (4-6)	YM-94-050	N	N	UNSAT	N/A	
	Does the purchase document specify passdown requirements to subtier suppliers?	Page 7 (4-7)	YM-94-050	N	N	UNSAT	N/A	
	Does Security Archives P.O. specify technical and Quality requirements for QA Records and has the Security Archives program been accepted?	Page 7 (4-8)	N	N	N	SAT	N/A	

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QA ELEMENT/ ACTIVITIES	PROCESS STEPS	DETAILS (Checklist)	CAR	CDA	RECOM- MENDATION	ADE- QUACY	COMPL- IANCE	OVER- ALL
7.0 Control of Purchased Items & Services	Were suppliers found to be unqualified to perform work after they have been evaluated or qualified for the scope of work?	Page 8 (7-1)	YM-94-050	N	N	UNSAT	N/A	UNSAT
	After supplier qualification was the supplier audited after accomplishment of sufficient work to demonstrate program implementation?	Page 8 (7-2)	N	N	N	UNSAT	N/A	
	After successful completion of the initial audit, was the Triennial audit date determined?	Page 9 (7-3)	N	N	N	SAT	N/A	
	Are suppliers Certification of Conformance periodically evaluated for appropriateness and validity, are results documented?	Page 9 (7-4)	N	N	6.0, #3	SAT	N/A	

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QA ELEMENT/ ACTIVITIES	PROCESS STEPS	DETAILS (Checklist)	CAR	CDA	RECOM- MENDATION	ADE- QUACY	COMPL- IANCE	OVER- ALL
7.0 Control of Purchased Items & Services	Is supplier test data produced and documented by a supplier evaluated for deficiencies or problems?	Page 10 (7-5)	N	N	N	N/A	N/A	UNSAT
	Are instances where items or services represented by documented evidence of acceptability subsequently found defective?	Page 10 (7-6)	N	N	6.0, #3	SAT	N/A	
	Does QMP 7.04 contain methodology for planning verifications, determining qualitative and quantitative acceptance evidence? Does source verification form reflect the procedure and proper distribution of the report?	Page 11 (7-7)	N	N	N	SAT	N/A	
	Does QMP 7.04 require the performance of an audit after sufficient work has been performed to demonstrate the QA program is being implemented effectively?	Page 11 (7-8)	YM-94-050	N	N	UNSAT	N/A	

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AUDIT YM-ARP-95-09 DETAIL SUMMARY

QA ELEMENT/ ACTIVITIES	PROCESS STEPS	DETAILS (Checklist)	CAR	CDA	RECOM-MENDATION	ADE-QUACY	COMPL-IANCE	OVER-ALL
7.0 Control of Purchased Items & Services	Does DRI (Reno) agreement identify which QMPs they are to use and are all DRI procedures in compliance with QMP 5.01 and does the MOA agreement involve USGS QMPs?	Page 12 (7-9)	YM-94-050	N	N	UNSAT	N/A	UNSAT
16.0 Corrective Action	Are CARs directed by management at a level sufficient to obtain results?	Page 13 (16-1)	N	N	6.0, #2	SAT	N/A	UNSAT
	Are Corrective Actions timely?	Page 13 (16-2)	YM-95-042	N	N	UNSAT	N/A	
	Are there repetitive deficiencies, indicating that action to prevent recurrence was adequate? How well was the problem bounded, e.g., extent of deficiency?	Page 14 (16-3)	YM-95-042	N	N	UNSAT	N/A	
	Is there evidence of upper-management concern over or involvement in, Corrective Action for significant problems?	Page 14 (16-4)	N	N	N	N/A	N/A	

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AUDIT YM-ARP-95-09 DETAIL SUMMARY

QA ELEMENT/ACTIVITIES	PROCESS STEPS	DETAILS (Checklist)	CAR	CDA	RECOM-MENDATION	ADE-QUACY	COMPL-IANCE	OVER-ALL
16.0 Corrective Action	Does the Trend Program detect/recognize recurrence of significant problems/deficiencies that by themselves appear to be isolated, but as a group represent a significant trend?	Page 15 (16-5)	YM-95-042	N	N	UNSAT	N/A	UNSAT
	Is the Root Cause Analysis appropriate for the deficiency and does the Corrective Action response address the root cause determination?	Page 15 (16-6)	N	N	N	N/A	N/A	
	Do the Audit Reports reflect an evaluation for effectiveness of previous CAR?	Page 16 (16-7)	N	N	N	SAT	N/A	
	Has Security Archives corrected the fire-path at the Halon pipe penetration and has the temperature and humidity been maintained with recommended minimums?	Page 16 (16-8)	N	N	N	SAT	N/A	

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AUDIT YM-ARP-95-09 DETAIL SUMMARY

QA ELEMENT/ ACTIVITIES	PROCESS STEPS	DETAILS (Checklist)	CAR	CDA	RECOM- MENDATION	ADE- QUACY	COMPLI- ANCE	OVER- ALL
18.0 Audits	Are suppliers annual performance evaluations being performed within the scheduled annual date, \pm one month?	Page 17 (18-1)	YM-94-050	N	N	UNSAT	N/A	UNSAT
	Do USGS audits specifically evaluate compliance to procedure? If so, do the procedures adequately implement the QARD requirements?	Page 17 (18-2)	YM-94-050 and YM-95-041	N	6.0, #4	UNSAT	N/A	
	Are augmented staff organization audited on an annual basis or included as part of the internal audit program? Are performance based audits performed? If so, how have the results been utilized by management?	Page 18 (18-3)	N	N	N	N/A	N/A	
	Were audits timed with consideration of major activities, milestones, or deliverables?	Page 19 (18-4)	YM-95-041	N	N	UNSAT	N/A	

