



Department of Energy

Washington, DC 20585

DEC 16 1996

R. W. Craig, Technical Project Officer
for Yucca Mountain Site
Characterization Project
U.S. Geological Survey
1261 Town Center Drive
Building 4, Room 423, M/S 423
Las Vegas, NV 89134

**EVALUATION OF RESPONSE TO DR YM-97-D-004 RESULTING FROM OQA SUPPLIER
AUDIT OQA-SA-97-002 OF EPPLEY LABORATORY**

The Office of Quality Assurance staff has evaluated the response to Deficiency Report YM-97-D-004. The response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this date must be requested in writing, with appropriate justification, prior to the date. Please send a copy of extension requests to Deborah Sult, OQA/QATSS, P.O. Box 98608, Mail Stop 455, Las Vegas, Nevada 89193-8608.

If you have any questions, please contact either Mario R. Diaz at (702) 794-1489 or Richard L. Maudlin at (702) 794-1302.

OQA:MRD-0507

for Mario Diaz
Donald G. Horton, Director
Office of Quality Assurance

Enclosure:
DR YM-97-D-004

cc w/encl:
J. O. Thoma, NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
T. H. Chaney, USGS, Denver, CO
Records Processing Center = "7"

cc w/o encl:
W. L. Belke, NRC, Las Vegas, NV
R. L. Maudlin, OQA/QATSS, Las Vegas, NV
D. G. Sult, OQA/QATSS, Las Vegas, NV
R. W. Clark, DOE/OQA, Las Vegas, NV

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Recp: NMISS/HLUR



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

8 Performance Report
 Deficiency Report
NO. YM-97-D-004
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PERFORMANCE/DEFICIENCY REPORT

1 Controlling Document:
Eppley Laboratory Quality Assurance Manual, May, 1995/ Quality Assurance Requirements and Description, (QARD), (DOE/RW-0333P), Revision 5

2 Related Report No.
OQA-SA-97-002

3 Responsible Organization:
U.S. Geological Survey (USGS) / Eppley Laboratory

4 Discussed With:
George Kirk/Tom Kirk/Tom Chaney

5 Requirement/Measurement Criteria:

(A) Eppley QA Manual, Section 6.0, Subsection 6.2.8 states in part: "Equipment calibration documentation shall include the following information: ... (d) date of calibration and the recalibration due date"

(B) Office of Civilian Radioactive Waste Management QARD, Section 18.0, Subsection 18.2.1 states in part: "Scheduling internal audits: ... E. Internal audits of work to verify QA Program compliance shall be performed annually or at least once during the life of the work ..."

6 Description of Condition:

Contrary to these requirements:

(A) Certificates of Calibration issued to the USGS for the calibrations of Pyrometers Serial Nos 11923, 10702, 10386, 9482, 8553, 8545, and 12015 did not reference a recalibration due date

(B) The Eppley QA Manual, May 1995, does not require the performance of annual internal audit

(C) There was no objective evidence to reflect the performance of annual internal audits of the Eppley Laboratory QA program.

Note: Documented evidence was provided indicating a USGS audit of Eppley Laboratory in 1991 and 1994.

7 Initiator *Richard L. Maudlin*
Richard L. Maudlin Date 10/14/96

9 Is condition an isolated occurrence?
 Yes No Unknown; Must be Yes if PR

10 Recommended Action: (Not required for PR)

(A) Evaluate the impact of no recalibration date referenced on the calibration certificates. Update calibration certification as appropriate with the recalibration due dates.

(B) Identify actions taken to assure all future calibration certificates include a recalibration due date.

(C) Revise the Eppley QA Manual to reference the performance of annual internal audits.

11 QA Review:
QAR *Maudlin* Date 10/14/96

12 Response Due Date
20 working days from issuance

13 Affected Organization QA manager Issuance Approval: (QAR for PR)

Printed Name *Richard E. Spence* Signature *RE Spence* Date 10/15/96

22 Corrective Action Verified
QAR Date

23 Closure Approved by: (N/A for PR)
AOQAM Date

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RADIOACTIVE WASTE MANAGEMENT
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WASHINGTON, D.C.

8
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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

See DR Continuation Page 3

15 Extent of Condition: (Not required for PR)

See DR Continuation Page 3

16 Root Cause Determination: (Not required for PR)

Required Yes No

See DR Continuation Page 3

17 Action to Preclude Recurrence: (Not required for PR)

Required Yes No

See DR Continuation Page 3

18 Corrective Action Completion Due Date:

See DR Continuation Page 3

19 Response by:

Initial *T. Williams* Date 11/14/96 Phone
 Amended

20 Response Accepted

QAR *D. Sanchez*

Date 11/21/96

21 Response Accepted (N/A for PR):

for AQAM *Davis*

Date 12-12-96

11/17/96 Sanchez in Horton

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PR/DR CONTINUATION PAGE

Block 14: Remedial Actions:

1. The requirement for the recalibration due date to be included on the equipment calibration documentation is an overcommitment in the Eppley QA Manual. Each USGS Principal Investigator reports, tracks and submits all M&TE used for quality affecting activities for QA office review in accordance with USGS-QMP-12.01 (See attached Calibration Status Report dated 9/18/96 for specific Pyrometers in question for calibration due date). The Eppley QA Manual will be revised to delete this overcommitment.
2. The supplier does not have the capability to perform internal audits. The USGS will annotate the Supplier Evaluation Report (SER), to be submitted, that this element is not being implemented. The USGS will request that OQA perform an annual audit of the supplier to satisfy this element of the QA Program.

Block 15: Extent of Condition:

Investigative actions:

- a. A review of active calibration suppliers' quality assurance manuals will be performed to determine if similar overcommitments exist.
- b. A review of existing SERs will be performed to determine if annual internal audits have been appropriately addressed.

Block 16: Root Cause Determination:

Not applicable

Block 17: Action to Preclude Recurrence:

1. If upon review, additional overcommitments are identified, the USGS will contact each affected supplier and recommend the necessary change.
2. If required, SERs will be appropriately annotated and a request will be made that OQA perform annual internal audits of suppliers who do not have the capability to implement this element of the QA Program.

Block 18: Corrective Action Completion Date:

A supplemental response will be provided to your office after investigative actions have been completed. It is anticipated that investigative actions will be completed by February 15, 1997.

CALIBRATION RECORD
CALIBRATION STATUS = Active,Pe

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September 18, 19

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PI or Delegate: A.L. Flint

***** ESIP, Nevada Test Site *****

<u>ACT.</u>	<u>ID NUMBER</u>	<u>INSTRUMENT NAME</u>	<u>LAST CAL</u>	<u>NEXT CAL</u>	<u>CALIBRATED BY</u>
A	PTLY11341	Pressure Gage	09/03/96	03/03/97	Bechtel Nevada
A	PTLY11342	Pressure Gage	09/03/96	03/03/97	Bechtel Nevada
A	PTLY11441/11078	Oven	10/17/95	04/17/97	ResCo
A	FY10378	Pyranometer (SR)	03/26/96	03/26/98	Eppley
A	FY10386	Pyranometer	03/26/96	03/26/98	Eppley Labs
A	FY10702	Pyranometer (SR)	03/26/96	03/26/98	Eppley
A	FY11923	Pyranometer	03/26/96	03/26/98	Eppley Labs
A	FY12017	Pyranometer	03/26/96	03/26/98	Eppley Labs
P	FY3137	Pyranometer (SR)	01/22/92	Pending	N/A
P	FY8538	Pyranometer (SR)	08/09/93	Pending	N/A
A	FY8545	Pyranometer (SR)	03/26/96	03/26/98	Eppley
A	FY8553	Pyranometer (SR)	03/26/96	03/26/98	Eppley
A	FY9482	Pyranometer (SR)	03/26/96	03/26/98	Eppley
P	FY9741	Pyranometer (SR)	08/09/93	Pending	N/A

***** ESIP, Unspecified Location *****

<u>ACT.</u>	<u>ID NUMBER</u>	<u>INSTRUMENT NAME</u>	<u>LAST CAL</u>	<u>NEXT CAL</u>	<u>CALIBRATED BY</u>
P	288-19-2	Wind Direction Sensor	08/14/90	Pending	N/A
P	E1372	Wind Direction Sensor	08/13/90	Pending	N/A