



Department of Energy

Washington, DC 20585

QA: L

JUL 23 1997

R. W. Craig, Technical Project Officer
for Yucca Mountain Site
Characterization Project
U.S. Geological Survey
1261 Town Center Drive
Building 12, Room 1249, M/S 423
Las Vegas, NV 89134

EVALUATION OF RESPONSE TO DEFICIENCY REPORT (DR) YM-97-D-039
RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT
USGS-ARC-97-15 OF U.S. GEOLOGICAL SURVEY

The OQA staff has evaluated the response to DR YM-97-D-039. The response has been determined to be unsatisfactory. The DR, in part, identifies that implementation was initiated prior to development and approval of the Project Plan; which is contrary to Quality Management Procedure 3.16 requirements. The response to that element indicates that there were drafts of the Plan that were implemented and that these drafts did not change during in-process review, thereby, having no adverse affect on the activity. Although we agree with this impact analysis, we do not agree with the statement in block 17 that "because the Probabalistic Seizmic Hazard Analysis project is a one-of-a-kind activity. . ." no action to preclude recurrence is necessary. Measures to preclude recurrence of working outside of procedural requirements must be addressed. Also, regarding remedial action 2, is it premature to conclude ". . . there is no impact on the work being done to date" until the personnel qualification process is complete. Please provide an amended response to address the above.

An amended response is required to be submitted to this office within ten working days of the date of this letter. Send the original of your response to Deborah Sult, OQA/QATSS, P.O. Box 30307, Mail Stop 455, North Las Vegas, Nevada 89036-0307. 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 James Blaylock at (702) 794-1420 or Ardell M. Whitside at (303) 236-5050

for R.W. Craig
Donald G. Horton, Director
Office of Quality Assurance

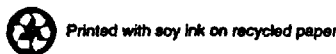
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Enclosure:
DR YM-97-D-039

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recip: NMSS PAHL

R. W. Craig

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JUL 23 1997

cc w/encl:

J. O. Thoma, NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
T. H. Chaney, USGS, Denver, CO  
D. J. Sinks, OQA/USGS, Denver, CO  
A. M. Whiteside, OQA/USGS, Denver, CO

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV  
D. G. Sult, OQA/QATSS, Las Vegas, NV  
James Blaylock, DOE/YMSCO, Las Vegas, NV

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

8  Performance Report  
 Deficiency Report  
 NO. YM-97-D-039  
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**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document: USGS-YMP-QMP-03.16, Revision 0	2 Related Report No. USGS-ARC-97-15
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3 Responsible Organization: U.S. GEOLOGICAL SURVEY (USGS)	4 Discussed With: Martha Mustard, Bruce Parks
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5 Requirement/Measurement Criteria:

YMP-USGS-QMP-3.16, Revision 0, controls scientific elicitation. The process was initiated on or before October 1996, yet the procedural requirement has not been implemented in a timely manner.

6 Description of Condition:

Although implementation was initiated on or before October 1996, the Project Plan, which addresses the process in detail from stating the objective of the expert elicitation through the review and approval of the product, was not approved until April 30, 1997. Likewise, the attestation of qualifications has not been documented for many of the participants in the process.

7 Initiator James Blaylock <i>James Blaylock</i> Date <u>5/7/97</u>	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown; Must be Yes if PR
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10 Recommended Action: (Not required for PR)

11 QA Review: QAR <i>James Blaylock</i> Date <u>5/8/97</u>	12 Response Due Date 20 working days from issuance
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13 Affected Organization Printed Name <u>D G HORTON</u>	QA Manager Issuance Approval: (QAR for PR) Signature <i>James Blaylock</i>	Date <u>5/13/97</u>
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22 Corrective Action Verified QAR _____ Date _____	23 Closure Approved by: (N/A for PR) AOQAM _____ Date _____
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ORIGINAL

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

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions:

1. Although implementation was initiated on or before October 1996, the Project Plan, which addresses the process in detail from stating the objective of the expert elicitation through the review and approval of the product, was not approved until April 30, 1997. Prior to approval of the Project Plan, a plan had been drafted and was in the review process. Documentation of the various drafts will show that the work done prior to final approval follows the final plan and that the scope, objectives, and technical work was not changed during the review, re-writing, and comment resolution process. Additionally, the Project Managers were implementing the project at the same time that they were drafting and finalizing the Project Plan; implementation followed the way the plan was being written.
2. Likewise, the attestation of qualifications has not been documented for many of the participants in the process. Attestation letters and accompanying documentation of the experts qualifications are currently being finalized. The qualifications of the technical experts used in the Probabilistic Seismic Hazards Analysis (PSHA) project were well known to the managers of the project. Therefore, there is no impact on the work being done to date.

15 Extent of Condition: (Not required for PR)

1. The PSHA project is a one-of-a-kind activity for the USGS Yucca Mountain Program. Therefore, the condition cannot exist in any other YMP-USGS activity.
2. The personnel qualification documentation is incomplete for 32 of 43 of the personnel involved with PSHA.

16 Root Cause Determination: (Not required for PR)

Required:  Yes  No

A Root Cause Determination is not necessary because the PSHA project is unique within the YMP-USGS.

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

Required:  Yes  No

Because the PSHA project is a one-of-a-kind activity, and since the remedial actions that will be taken will correct the deficiencies, there will be no opportunity for a recurrence of either deficiency.

18 Corrective Action Completion Due Date:

July 31, 1997

19 Response by:

Bruce Parks, USGS, YMPB Date June 10, 1997 Phone (303) 236-5050 Ext 236

20 Response Accepted

QAR

Date:

21 Response Accepted (N/A for PR)

DOQA

Date

RWC  
7/23/97

6/9/97 Craig de Hostos