



Department of Energy
Washington, DC 20585

QA: L

NOV 14 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

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT
(DR) USGS-96-D-004

The OQA staff has verified the corrective action to DR USGS-96-D-004 and determined the results to be satisfactory. As a result, the DR is considered closed.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Donna J. Sinks at (303) 236-5050.

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

OQA:JB-0071

Enclosure:
DR USGS-96-D-004

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
R. W. Clark, DOE/OQA, Las Vegas, NV

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Recip: nrc/ss/PAHL

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WM-11 PDR



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

- Performance Report
- Deficiency Report

NO. USGS-96-D004

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PERFORMANCE/DEFICIENCY REPORT

¹ Controlling Document: <u>USGS-QMP-4.01, R7</u>	² Related Report No.: <u>NA</u>
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³ Responsible Organization: <u>ESIP/PASP</u>	⁴ Discussed With: <u>Mary Nelson, Arden Whiteside, Bruce Parks, Lou Ducret, Joyce Golos, Bob Williams</u>
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⁵ Requirement/Measurement Criteria:
See page 3

⁶ Description of Condition:
See page 3

⁷ Initiator: <u>Martha H Mustard</u> Date: <u>6-13-96</u>	⁹ QA Review: QAR <u>Martha H Mustard</u> Date <u>6-13-96</u>
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¹⁰ Response Due Date: <u>July 16, 1996</u>	¹¹ QA Issuance Approval <u>Millman</u> QAR (PRI/AOQAM (IDR)) / Date <u>6/17/96</u>
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¹² Remedial Actions:
See 10/2/96 response.

¹³ Remedial Action Response By: <u>see 10/2/96 response</u> Date: <u>10/2/96</u>	¹⁴ Remedial Action Due Date: <u>see 10/2/96 response</u>
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¹⁵ Remedial Action Response Acceptance: QAR <u>Emily Sitter</u> Date <u>10/4/96</u>	¹⁶ PR Verification/Closure: QAR <u>N/A</u> Date <u> </u>
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⁸ DR NO. USGS-96-0004
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DEFICIENCY REPORT

¹⁷ Recommended Actions:

see page 3

¹⁸ Investigative Actions:

See 10/2/96 response.

¹⁹ Root Cause Determination:

NA

²⁰ Action to Preclude Recurrence:

See 10/2/96 response.

²¹ Response by:
See 10/2/96 response Date 10/2/96

²² Corrective Action Completion Due Date
See 10/2/96 response

²³ Response Accepted
QAR *Clifford Smiter* Date 10/4/96

²⁴ Response Accepted
AOQAM *[Signature]* Date 10/4/96

²⁵ Amended Response Accepted
QAR *[Signature]* Date 4/24/97

²⁶ Amended Response Accepted
AOQAM *[Signature]* Date 4/24/97

²⁷ Corrective Actions Verified
QAR Refer to page 16 of 16 ^{RWC} 11/12/97 Date

²⁸ Closure approved by:
AOQAM *[Signature]* Date 11/12/97

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Block 5: Requirement/Measurement Criteria:

QMP-4.01, R7, para. 5.2.2a) and b) state "(5.2.2) THE REQUESTOR: (a) Upon receipt, compares the service to the procurement document to ensure that all requirements have been met. (b) Completes the backside of the Purchase Order form, (attachment 10), documenting partial receipt, conditional acceptance, full receipt, etc."

Block 6: Description of Condition:

Contrary to the above requirement, full receipt of services has been documented by signature on the backside of Purchase Orders

1434-CR-96-SA-00307 (Dr. John F. Schneider),
1434-CR-96-SA-00405 (Dr. Norman Abrahamson),
1434-CR-96-SA-00434 (Paul Van Der Heijde), and
1434-CR-96-SA-00371 (Beth Widmann)

although all purchase order requirements had not been met.

The four cited Purchase Orders required that personnel qualifications be documented in accordance with QMP-2.08. Personnel qualifications were not included with the QMP-2.08 files for the first three individuals cited. Personnel qualifications for the fourth individual cited were on file, but were related to a previous YMP-USGS employment. Additionally, the fourth individual cited performed the work scope of the purchase order without having documented training to the relevant procedure (QMP-3.04, R6 and associated modifications).

Block 17: Recommended Actions:

Obtain personnel qualification documentation for the cited procurements, preferably as required by QMP-2.08. If it is not possible/feasible to obtain the documentation required by QMP-2.08, provide a reason why it is not possible to meet the purchase order requirements and why the documentation being submitted should suffice AND either annotate the purchase order file (if it has not yet been submitted as a record package) or supplement the purchase order record package accordingly including a reference to this DR. For the fourth cited procurement, make a determination as to whether the previous qualification documentation for the individual will suffice for this work scope; if so, annotate the personnel qualification file to that effect.

Determine the extent of the condition.

Determine impact on the associated deliverables from this deficiency, including the lack of documented training for the fourth case cited. If any impact exists, 1) specify how the associated work products will be annotated to note the impact and 2) specify whether any work needs to be redone.

Determine actions to prevent recurrence.

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10/02/96 RESPONSE FOR DEFICIENCY REPORT USGS-96-D004.

BLOCK 12 REMEDIAL ACTIONS: Attachment A lists those procurements which were evaluated (Block 18) to determine if remedial actions are warranted. The four procurements cited in Block 6 of this DR are included in the Attachment A listing. For completed (closed) procurements requiring remedial actions, each procurement file will be updated to include either a) documentation to support deleting QMP-2.08 from the applicable procurement requirements, or b) documentation that QMP-2.08 qualification/or equivalent has been initiated. Receiving records will be updated accordingly. For open procurements requiring remedial actions, each procurement/file will be updated as needed.

IMPACT ON DATA: This administrative problem has not affected data.

ANNOTATION OF DOCUMENTATION: The documentation being generated to update each affected procurement file will refer to this DR.

The YMPB Acting Administrative Officer and the Associate Chief, ESIP, will be responsible for assuring that the remedial actions are completed and summary provided to QA Office.

BLOCK 13: REMEDIAL ACTION RESPONSE BY: Bruce Parks **DATE:10/02/96**
Bruce Parks, Associate Chief, Earth Science Investigations Program

BLOCK 14: REMEDIAL ACTION DUE DATE: March 31, 1997

BLOCK 18: INVESTIGATIVE ACTIONS: A review of the cited procurements indicated that this deficiency is limited to those procurements for obtaining services of personnel. To determine the extent of the condition, all FY96 procurements for these types of services were reviewed (see Attachment A) to determine appropriateness/applicability of QMP requirements, especially QMP-2.08 (non-Federal personnel qualification requirements). The receiving report records are being reviewed as part of the remedial actions.

BLOCK 20: ACTION TO PRECLUDE RECURRENCE: By October 31, 1996, the Associate Chief, ESIP, will meet with the YMPB Acting Administrative Officer and YMP-USGS QA Office personnel to discuss and reach consensus on determining applicability of QMP-2.08 for procurements and for developing action plan (with schedule) for instituting agreed-upon policy for all procurements. All FY96 procurements have been addressed as noted in Block 12. For FY97 procurements, this is an opportune time to implement policy change(s) at the start of the Fiscal Year.

QMP-4.01 was recently revised. Receiving acceptance is part of that procedure and training assignments have been made. Therefore, no additional training assignments are needed. In addition, ESIP will issue a reminder to all ESIP personnel to stress the importance of ensuring that "all requirements have been met" before completing and signing the receiving report copy of the Purchase Order form. This reminder will be issued by October 25, 1996.

BLOCK 21 RESPONSE BY: Bruce Parks **DATE:10/02/96**
Bruce Parks, Associate Chief, Earth Science Investigations Program

ATTACHMENT A

To USGS-96-D004

Page 1 of 3

Procurement #	Type of Service	Remedial/Follow-up Action Required
1434-CR-96-SA-01064	Quality-affecting: analysis by Royal Museum of Ontario (Dr.Y.Amelin)	QMP-2.08 qualification paperwork required. Training assignments required.
1434-CR-96-SA-00990	Quality-affecting: technical review of milestone report by R.Lawrence Edwards.	No remedial actions for DR required. Compliance with QMP-3.04 required. (reviewer selection, documentation of review, comment resolution, etc.).
1434-CR-96-SA-00989	Quality-affecting: technical review of data packages and technical procedure by Beth Widmann.	No remedial actions for DR required. PO requires compliance with QMP-3.04 (for data review) and should be corrected to also reflect compliance with QMP-3.07 (for technical procedure review).
1434-CR-96-SA-00660	Quality-affecting: overseeing U of Minn. analysis and refining raw mass spec. data by Dr.R.Lawrence Edwards.	QMP-2.08 qualification paperwork required. Training assignments issued.
1434-CR-96-SA-00591	Quality-affecting: analysis by University of Minnesota.	QMP-2.08 qualification paperwork required. Training assignments required.
1434-CR-96-SA-00526	Quality-affecting: technical support and training in document control implementation by Barbara Hersh.	QMP-2.08 qualification paperwork required. PO also requires compliance with QMP-6.01; therefore, training (reading, at a minimum) is implied.

ATT. A

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ATTACHMENT A

To USGS-96-D004

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Procurement #	Type of Service	Remedial/Follow-up Action Required
1434-CR-96-SA-00496	Quality-affecting: technical review and oversight by Mildred Murray for records management support.	QMP-2.08 qualification paperwork required.
1434-CR-96-SA-00453	Quality-affecting: evaluation work by Pacific Engineering & Analysis/Dr. Walter Silva for earthquake scenario ground motion project.	QMP-.208 qualification paperwork required. NOTE: QMP-3.04 was not required.
1434-CR-96-SA-00434	Quality-affecting: technical review by Paul Van Der Heijde/Research Professor for software validation report.	PO requires work to be in accordance with QMP-3.03. QMP-2.08 also noted in PO QA requirements as "for example". Review per -3.03 requires -3.07 which allows for reviewer selection (in lieu of -2.08). If -2.08 paperwork on file/initiated, actions will be considered complete. If not on file/initiated, documentation will be added to PO file to state why -2.08 paperwork not needed.
1434-CR-96-SA-00433	Non-quality-affecting: technical expert Dave Allerton to provide training on operation of USGS-GD scanning electron microscope.	NA
1434-CR-96-SA-00405	Quality-affecting: evaluation work by Dr. Norman Abrahamson for earthquake scenario ground motion project.	QMP-2.08 qualification paperwork required. PO also notes QMP-3.04 required. NOTE: for -00453 above, QMP-3.04 did not apply.

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AH. A

ATTACHMENT A

To USGS-96-D004

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Procurement #	Type of Service	Remedial/Follow-up Action Required
1434-CR-96-SA-00371	Quality-affecting: technical review of data by Beth Widmann.	PO requires review to be as required by QMP-3.04. QMP-2.08 also noted in PO QA requirements. Review per -3.04 allows for reviewer selection (in lieu of -2.08). If -2.08 paperwork on file/initiated, actions will be considered complete. If not on file/initiated, documentation will be added to PO file to state why -2.08 paperwork not needed. If documented training to QMP-3.04 is not available, an assessment of compliance with QMP-3.04 requirements will be made, and corrective actions taken as needed.
1434-CR-96-SA-00307	Quality-affecting: evaluation work by Dr. John F. Schneider for earthquake scenario ground motion project.	QMP-2.08 qualification paperwork required. PO also notes QMP-3.04 required. NOTE: for -00453 above, QMP-3.04 did not apply. Therefore, determine if QMP-3.04 should apply and if it applies, determine appropriate training assignment/completion.

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ATT A

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RESPONSE EVALUATION:

The response dated October 2, 1996 has been evaluated and found acceptable. A verification will be performed at a later date to determine that actions have been accomplished in accordance with the commitments stated in your response.

Submitted by: *Emily S. Reiter* Date: 10/4/96
Emily S. Reiter

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10/31/96 SUPPLEMENTAL RESPONSE FOR DEFICIENCY REPORT USGS-96-D004

The following information is provided to supplement the 10/2/96 response.

BLOCK 12 REMEDIAL ACTIONS: Actions are in -process and due date (3/31/97) for completion remains unchanged from 10/2/96 response.

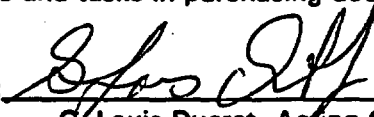
BLOCK 18: INVESTIGATIVE ACTIONS: No change from 10/2/96 response.

BLOCK 20: ACTION TO PRECLUDE RECURRENCE: The Associate Chief, ESIP and the QA Manager discussed the actions that were needed to reach consensus on determining applicability of QMP-2.08 for procurements and the agreed upon policy will be provided in another supplemental response by 12/23/96. The supplemental response also will include an action plan (with schedule) for instituting the agreed-upon policy for procurements beginning with those for FY97.

The Acting Chief, ESIP issued a memorandum to ESIP personnel to stress the importance of ensuring proper completion of requirements and tasks in purchasing documents. (Copy attached.)

Att. B
9/2 5/5/97

BLOCK 21 RESPONSE BY:



DATE: 10/31/96

G. Louis Ducret, Acting Chief, Earth Science Investigations Program



United States Department of the Interior

U. S. GEOLOGICAL SURVEY
Box 25046 M.S. 425
Denver Federal Center
Denver, Colorado 80225

IN REPLY REFER TO:

WBS #:1.2.3.1
INFORMATION COPY
October 25, 1996

MEMORANDUM

TO: Earth Science Investigations Program Personnel

FROM: G. Louis Ducret, Acting Chief, Earth Science Investigations Program, Yucca Mountain Project Branch *GLD*

SUBJECT: Receiving Acceptance

REFERENCE: Deficiency Report (DR) USGS-96-DO04 (acceptance of services that did not meet all of requirements stated in purchasing documents)

For those of you involved in receiving acceptance for quality-affecting procurements, it is very important that you take the necessary time to assure that all of the requirements stated within a purchasing document have been met before you indicate acceptance and sign the receiving report copy of the purchase order. The referenced deficiency document identified several instances where services were accepted yet not all of the stated requirements had been documented or implemented.

Before signing your acceptance on procurements, please check the requirements stated in the purchasing document and assure proper completion of tasks and related requirements. Or, if necessary, work with your supervisor, the vendor, or the YMPB administrative office to correct the purchasing document or obtain the needed information from the vendor. Your assistance in eliminating similar problems with receiving acceptance is appreciated.

GLD:aw

Copy to: Bob Craig
Bruce Parks
Tom Chaney
Joyce Golos

*Joyce -
Pls put this message
on E-mail to all YMPB
personnel
Lou*

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01/17/97 STATUS AND EXTENSION REQUEST FOR COMPLETION OF ACTIONS
FOR DEFICIENCY REPORT (DR) USGS-96-D004

NOTE: See Att. C (12/23/96 extension request) and Att. D (12/27/96 approval) D/L 5/5/97

The following information provides an explanation of the progress of commitments actions and requests an extension for completion of preventive actions.

BLOCK 12 REMEDIAL ACTIONS: Actions are in -process and due date (3/31/97) for completion remains unchanged from 10/2/96 response.

BLOCK 18: INVESTIGATIVE ACTIONS: No change from 10/2/96 response.

BLOCK 20: ACTION TO PRECLUDE RECURRENCE: Comments on the draft policy statement were received and the policy statement is being revised. Additional review time will be necessary to assure that we have addressed the conditions and the review comments appropriately. Further discussions within ESIP and with YMP-USGS QA and the YMPB Administrative Office are needed to reach consensus on distributing the policy statement. Additionally, discussions will determine whether any changes are needed to QMP-4.01 as a result of the policy statement.

Upon reaching agreement on the policy statement, an action plan (with schedule) will be provided for instituting the agreed-upon policy for procurements beginning with those for FY97. We estimate completion of these actions by February 21, 1997.

Other actions were completed as noted in the 10/31/96 supplemental response.

BLOCK 21 RESPONSE BY: G. Louis Ducret **DATE:** January 17, 1997
G. Louis Ducret, Acting Chief, Earth Science Investigations Program

WBS #:1.2.3.1

QA: L

December 23, 1996

MEMORANDUM

TO: Emily Reiter, YMP-USGS QA Corrective Action Coordinator

FROM: Ardell Whiteside, QAIS, Earth Science Investigations Program *Ardell Whiteside* 12-23-96

SUBJECT: Extension request for submittal of supplemental response for Deficiency Report USGS-96-D004 (acceptance of services that did not meet all purchase order requirements)

The "Actions to Preclude Recurrence" have not been completed as anticipated for the subject Deficiency Report. Additional time is needed to allow for ESIP personnel to coordinate with the YMPB Administrative Officer and the Quality Assurance Office. The actions were delayed primarily due to: 1) availability of personnel required to meet and agree upon the proposed procurement-related policy for the DR; and 2) work efforts associated with the OCRWM USGS-to-OQA transition and OCRWM OQA findings (YM-96-D093 and YM-97-D002). Now, given the holiday and personnel leave schedules, we anticipate completing the necessary coordination actions within the next 3-4 weeks. Therefore, an extension until 01/17/97 is requested for submitting the supplemental DR response.

If you have any questions or require additional information, please contact me at 236-5050 extension 233.

Copy to: Bob Craig
Lou Ducret
Tom Chaney
Bruce Parks
Joyce Golos
Mary Nelson
Alice Lykins

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United States Department of the Interior

U. S. GEOLOGICAL SURVEY

Box 25046 M.S. 425

Denver Federal Center
Denver, Colorado 80225

QA: L

December 27, 1996

IN REPLY REFER TO:

MEMORANDUM

TO: Ardell Whiteside, QAIS, Earth Science Investigations, Yucca Mountain Project,
U. S. Geological Survey, Denver, CO, MS 425

FROM: for T. H. Chaney *Martha H. Mustard*
YMP-USGS Quality Assurance Manager

SUBJECT: USGS-96-D004 - Acceptance of services that did not meet all purchase order
requirements
Extension Request Approval

The extension request dated December 23, 1996, has been reviewed and approved. Please provide your supplemental response by January 17, 1997.

If you have any questions, please contact Emily Reiter at 236-0516, extension 297.

TCH/ESR

Copies to: R. W. Craig, USGS, Las Vegas, NV
A. Anderson, USGS, Denver, CO
L. Ducret, USGS, Denver, CO
B. Parks, USGS, Denver, CO
J. Golos, USGS, Denver, CO
M. Nelson, USGS, Denver, CO
A. Lykins, USGS, Denver, CO

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**EVALUATION AND APPROVAL OF EXTENSION REQUEST DATED 01/17/97
AND REQUEST FOR SUPPLEMENTAL RESPONSE**
(page 1 of 1)

EVALUATION AND APPROVAL OF EXTENSION REQUEST:

The Extension Request of 1/17/97 has been evaluated and approved.

REQUEST FOR SUPPLEMENTAL RESPONSE:

Please provide a Supplemental Response to the USGS QA Office by 3/31/97 addressing the following issues:

1. Remedial Actions (see Block 12 of 10/2/96 response)
2. Actions to Prevent Recurrence: (see Block 20 of 1/17/97 status)

A response to the QA Office is by due by 3/31/97.

Prepared by: Donna J. Sinks
Donna J. Sinks, USGS QA Office

Date: 3/6/97
3/6/97

donna\dr\96d004\0306.app

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**03/31/97 EXTENSION REQUEST AND AMENDED RESPONSE FOR COMPLETION OF ACTIONS
FOR DEFICIENCY REPORT (DR) USGS-96-D004**

As a result of the time needed to complete preventive actions for this deficiency, and to conduct investigations for the recently issued deficiency USGS-97-D003 (receiving acceptance reports), procurement records will be considered in-process until both deficiencies are resolved. Submittal of procurements packages will take place subsequent to deficiency resolution.

An extension is needed to complete the remedial and preventive actions, and the reponse has been amended to allow for investigative and remedial actions for FY97 procurements.

BLOCK 12 REMEDIAL ACTIONS: Actions are in-process for the FY96 procurements and additional time is needed for completion. The personnel responsible for completing the actions have been involved in the efforts associated with the QA transition and have not had time to complete the DR actions. It is anticipated that the actions described in the 10/2/96 response will be completed by the end of April 1997.

Remedial actions involving FY97 procurements issued prior to finalization and implementation of the policy identified in Block 20 will be completed by the end of May 1997.

BLOCK 14: REMEDIAL ACTION DUE DATE: 4/30/97 – complete actions for FY96 procurements
5/30/97 – complete actions for FY97 procurements

BLOCK 18: INVESTIGATIVE ACTIONS: It will be necessary to evaluate the FY97 procurements for similar problems as identified within this DR. Investigative actions will be completed prior to the remedial actions noted above.

BLOCK 20: ACTION TO PRECLUDE RECURRENCE: The draft policy statement discussed in the 1/17/97 status update/extension request is being further reviewed by USGS management and will be issued by the end of April 1997. Upon finalization of the policy statement, USGS management will determine the necessary actions to implement the policy.

Actions to preclude recurrence will be completed by the end of May 1997.

BLOCK 21 RESPONSE BY: Bruce Parks **DATE:** March 31, 1997
Bruce Parks, Associate Chief, Earth Science Investigations Program

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EVALUATION OF AMENDED RESPONSE, APPROVAL OF EXTENSION REQUEST, AND REQUEST FOR SUPPLEMENTAL RESPONSE

(Page 1 of 1)

EVALUATION OF AMENDED RESPONSE

The Amended Response of 3/31/97 has been evaluated and approved.

APPROVAL OF EXTENSION REQUEST

The Extension Request of 3/31/97 has been evaluated and approved.

REQUEST FOR SUPPLEMENTAL RESPONSE

The YMP-USGS QA Office has reviewed the extension request. We agree with the stated actions and completion dates for the FY96 procurements and the completion of the policy statement. However, FY97 procurements should not be considered part of this deficiency because of the issuance of YMP-USGS-QMP-4.01, R8, which provides new guidance for the purchase agreement for augmented staff. Any actions needed for FY97 procurements will be evaluated by the QA Office after the policy statement is completed.

Therefore, a supplemental response addressing remedial actions for the USGS FY96 procurements is due 4/30/97. As stated in the amended response, a supplemental response addressing finalization of the policy statement (discussed in the 1/17/97 status update/extension request) is due 5/30/97.

A supplemental response addressing remedial actions for FY96 procurements is due by 4/30/97.

Approved by: _____



T.H. Chaney, YMP-USGS QA Manager

Date: 4/24/97

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04/30/97 SUPPLEMENTAL RESPONSE FOR DEFICIENCY REPORT (DR) USGS-96-D004

As a result of the 4/24/97 memorandum from the USGS QA Office, the following is submitted as supplemental information.

BLOCK 12 REMEDIAL ACTIONS: Actions have been completed for the FY96 procurements. Record packages have been prepared and will be submitted pending QA's check of the packages for acceptability as part of the remedial actions for this DR. (See copy of attached submittal form). *Att. E 0/4 5/5/97*
of 4/30/97

Remedial actions involving FY97 procurements ~~issued~~ are not part of this DR (ref. 4/24/97 memorandum from USGS QA Manager). *(p. 10 of DR)*

BLOCK 14: REMEDIAL ACTION DUE DATE: Completed.

BLOCK 18: INVESTIGATIVE ACTIONS: Completed.

BLOCK 20: ACTION TO PRECLUDE RECURRENCE: A response addressing finalization of the policy statement will be submitted to the QA Office on or before 5/30/97. Upon finalization of the policy statement, USGS management will determine the necessary actions to implement the policy.

Actions to preclude recurrence will be completed by the end of May 1997.

BLOCK 21 RESPONSE BY: *[Signature]* **DATE: April 30, 1997**
for G.Louis Ducret, Acting Chief, Earth Science Investigations Program

SUBMITTAL FORM FOR YMP-USGS RECORD SOURCE
(Typical Example)

QA: Information Only

Submittal No. (to LRC) _____

LRC No. _____

Check One: Individual QA Records Publication Initial Segment
 Complete QA Record Packages

Document Identification or Package Title(s)	Author or Originator	LRC Number
Paul van der Heijde 1434-CR-96-SA-00934	Hersh L	
John F. Schneider 1434-CR-96-SA-00307	"	
Beth Widmann 1434-CR-96-SA-00989	"	
Barbara Hersh 1434-CR-96-SA-00526	"	
University of Minnesota 1434-CR-96-SA-00591	"	
Dr. Lawrence Edwards 1434-CR-96-SA-00660	"	
Dr. Walter Silva 1434-CR-96-SA-00453	"	
Mildred Murray 1434-CR-96-SA-00496	"	
Beth Widmann 1434-CR-96-SA-00391	"	
Norman Abrahamson 1434-CR-96-SA-00405	"	

A copy of this form will be returned to you as a receipt.

Submitted by _____

George P. Julius
Signature

of _____

USGS/WRD/YMPB
Organization

425
Mail Stop

4/28/97
Date

Received by LRC Staff: _____

Initials

Date

LRC QA Records Accepted: _____

Initials

Date

USGS-WRD-YMPB
Form 5
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EVALUATION OF SUPPLEMENTAL RESPONSE AND REQUEST FOR SUPPLEMENTAL RESPONSE
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EVALUATION OF SUPPLEMENTAL RESPONSE

The Supplemental Response of April 30, 1997 has been evaluated and approved. Verification by the USGS QA Office will be conducted by May 30, 1997.

REQUEST FOR SUPPLEMENTAL RESPONSE

As stated in response of April 30, 1997, a supplemental response addressing finalization of the policy statement (discussed in the 1/17/97 status update/extension request) is due 5/30/97. Any actions needed for FY97 procurements will be evaluated by the QA Office after the policy statement is completed.

A supplemental response addressing remedial actions for FY96 procurements is due by 5/30/97.

Approved by: _____


T.H. Chaney, YMP/USGS QA Manager

Date: 5/5/97

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SUPPLEMENTAL RESPONSE FOR DEFICIENCY REPORT (DR) USGS-96-D004

As a result of the 4/30/97 Supplemental Response, the following provides the finalized policy statement.

Block 20: Action to Preclude Recurrence:

POLICY: Personnel contracted for specific tasks, usually limited in scope, shall conduct the tasks in accordance with those quality assurance requirements deemed appropriate by the Technical Contacts, Points-of-contacts, and/or the Contracting Officer's Representatives. The requirements will be specified explicitly in the procurement document or the procurement document will explain that instructions will be conveyed to the personnel via separate correspondence.

IMPACT ON EXISTING QMPs: No changes are needed to QMPs -2.02, 2.07, or 2.08. QMP-4.01 R9 allows for procurements of augmented staff to be considered non-quality-affecting. ESIP recommends that a change be issued to the QMP to clarify that the only non-quality-affecting procurements for "augmented staff" are those procurement bringing on personnel to perform YMPB work on a day-to-day basis. Other procurements involving personnel contracted for "limited-scope services" are to be considered quality-affecting.

Block 21: Response by: *Bruce Parks* Date: 6/3/97
Bruce Parks, Chief, ESIP Implementation Team

Block 22: Corrective Action Due Date: 7/15/97 ESIP to provide recommended modification for QMP-4.01 R9.

Duplicate of lost original 6/29/99

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ATTACHMENT F: VERIFICATION OF USGS-96-D004

Purchase order	Vendor	QMP-2.08	QMP-3.04	QMP-3.07	Misc. Requirements	Issue and Associated Corrective Action
1434-CR-96-SA-00405 (closed: to be submitted to RPC)	Norman Abrahamson	4/11/97 memo to PO file: - refers to DR - receiving acceptance - sole source PO, so 2.08 not needed	R7: 2/21/96 M1: 2/21/96 M2: 9/16/96 R8: 3/25/97	NA	- 4/30/96 receiving report on DI-1	1. sole source just. not signed by Central Region purchasing: note by J. Golos, 9/2/97 on p. 2 of "Justification and Approval for Other Than Open Procurement" that original signature on file in CR procurements 2. waiver of QMP-2.08 require. not on file: 9/3/97 waiver of require., refers to DR, limited scope
1434-CR-96-SA-00434 (closed: to be submitted to RPC)	Paul van der Heijde	4/11/97 memo to PO file: - refers to DR - receiving acceptance - 2.08 not needed - rev. sel. form	see Issue	NA	NA	1. waiver of QMP-2.08 require. not on file: - 4/11/97 reviewer selection form for new work refers to DR - QMP-3.03 assigned
1434-CR-96-SA-00307 (closed: to be submitted to RPE)	John F. Schnyder	in pers. file: - resume only, no date 4/11/97 memo to PO file: - receiving accept. - sole source & resume OK for 2.08	R5-M1,M2: 1/23/95 R6: 1/26/95 M1: 3/4/96 M2: not assigned M3: waived R7 not appl.	NA	Rec. Rpt. 12/19/95 by Whitney	1. sole source justification not signed by Central Region purchasing: note by J. Golos, 9/2/97 made on p. 2 of "Justification and Approval for Other Than Open Procurement" that original signature on file in CR procurements 2. waiver of QMP-2.08 requirements not on file: 9/3/97 waiver of requirements, refers to DR, limited scope
1434-CR-96-SA-00371 (closed: to be submitted to RPC)	Beth Widmann	4/11/97 memo to pers. file (OK): - historical SAIC quals. OK - refers to DR	R7-M1,2: OK	see Issue	4/11/97 memo to PO file: - receiving acceptance - refers to DR	1. which rev. sel. forms in file applies: 9/27/95 or 1/17/96? - Note made on YMP-USGS Rev. Sel form referring to DR and use of wrong form (9/27/95) in file

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USGS:AMR

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Purchase order	Vendor	QMP-2.08	QMP-3.04	QMP-3.07	Misc. Requirements	Issue and Associated Corrective Action
1434-CR-96-SA-00989 (closed: to be submitted to RPC)	Beth Widmann	4/11/97 memo to pers. file: - historical SAIC quals OK - refers to DR - Rec. Accept.	R7-M1,2 OK	NA		None
1434-CR-96-SA-00526 (closed: to be submitted to RPC)	Barbara Hersh	PD (9/11/92) resume (9/31/91) qual. state (9/11/92) 4/11/97 memo to PO file: - refers to DR - old quals. OK	NA	NA	QMP-6.01 - OK	None
1434-CR-96-SA-00591 (closed: to be submitted to RPC)	University of Minnesota (Dr. Lawrence Edwards)	unsigned resume only on file 4/11/97 memo to PO file: - rec. accept. - limited scope - resume only for 2.08	NA	NA	attached to PO: - QMP-2.07 - QMP-2.08 - GCP-03	1. waiver of QMP-2.08 requirements not on file: 9/3/97 waiver of requirements, refers to DR, limited scope (GCP-03)
1434-CR-96-SA-00990 (closed: to be submitted to RPC)	Dr. Lawrence Edwards	see Issue	see Issue	NA	NA	1. where is rev. sel. form? 4/11/97 memo to PO file: - rev. sel. form in Milestone Rep. 3GQH450M - refers to DR

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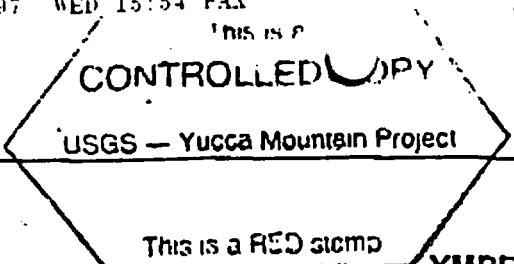
Purchase order	Vendor	QMP-2.08	QMP-3.04	QMP-3.07	Misc. Requirements	Issue and Associated Corrective Action
1434-CR-96-SA-00660 (closed: to be submitted to RPC)	Dr. Lawrence Edwards	unsigned resume only on file 4/11/97 memo to PO file: - rec. accept. - limited scope - resume only for 2.08 - procs. attached to PO	NA	NA	NA	1. waiver of QMP-2.08 requirements not on file: 9/3/97 waiver of requirements, refers to DR, limited scope
1434-CR-96-SA-00453 (closed: to be submitted to RPC)	Pacific Eng. & Analysis (Dr. Walter Silva)	unsigned resume	see Issue	NA	NA	1. waiver of QMP-2.08 requirements not on file: 9/3/97 waiver of requirements, refers to DR, limited scope
1434-CR-96-SA-00496 (closed: to be submitted to RPC)	Mildred Murray	resume PD qual. statement 4/11/97 memo to PO file: old SAIC quals. OK	NA	NA	NA	None
1434-CR-96-SA-01064 (open)	Dr. Y. Amelin	resume unsigned; 4/11/97 memo to PO file: - rec. accept. - limited scope - resume sufficient	NA	NA	Rec. Rpt. by Paces 1/16/97 (partial)	1. waiver of QMP-2.08 requirements not on file: 9/3/97 waiver of requirements, refers to DR, limited scope (GCP-12)

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YMPB MODIFICATION TO YMPB QUALITY MANAGEMENT PROCEDURE

QMP TITLE: QMP -4.01, R9-M1, Procurement Document Control/Receipt of Procurements

Modification Number: QMP-4.01, R9-M1 Effective Date: August 20, 1997

APPROVAL:

[Signature] 8/12/97
Chief, Yucca Mountain Project Branch Date

CONCURRENCE:

[Signature] 8-12-97
DOE/OCRWM, Date
Office of Quality Assurance Representative

REQUIRED MODIFICATIONS:

1. Replace page 1 of Attachment 1 with the enclosed page.
2. Revised the attachment to clarify suppliers working in a direct support capacity as part of USGS 96-D004.

GUIDELINES FOR DETERMINING APPLICABILITY OF QUALITY REQUIREMENTS TO PROCUREMENTS

1. Procurements that fall within the scope of this procedure include the following:
 - Tasks and services used for YMP Site Characterization activities, including sample collection and data analysis.
 - A supplier working in a direct support capacity, also referred to as augmented or extended staff performing YMP site characterization activities. In this case the procurement document needs a statement that commits the supplier to work to the applicable requirements of the YMPB QA program. If appropriate, identification of which USGS implementing documents apply and that copies of any referenced procedures will be provided to the supplier shall be stated in the procurement document also. The supplier will be working to applicable portions of the USGS QA program and will not require qualification via AP-7.4Q.
 - Examples typically include:
 - calibration services (may include purchase of equipment that needs calibration)*
 - analytical services
 - software development or modification
 - supporting research or data development
 2. Procurements that are not considered to fall within the scope of the procedure include the following:
 - Activities that are not used for YMP Site Characterization.
 - Examples typically include:
 - Non-technical material and services such as office supplies, standard office equipment, clerical services, etc.
 - Equipment, tools and material, such as batteries, hammers, screw drivers, drills, generators, saws, nails, lumber; safety equipment, such as slings, tie-downs, hard hats; vehicles and related maintenance, supplies and repairs, such as oil and tires; and camping and personal equipment.
 - Standard computer and peripheral equipment, such as PCS, printers, interfaces, modems, monitors, keyboards, diskettes, supplies, etc.
 - Photographic film.
 - Commercial-grade mechanical and electronic replacement parts for equipment that is subject to calibration.
 - Periodicals, books, and publications, including maps.
 - Thin sections.
 - Mineral separations.
-
- * When equipment is purchased as calibrated, the supplier must be qualified to provide calibration services in accordance with OCRWM AP-7.4Q.

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Block 20 (according to AP-16.10.R2)

EVALUATION OF SUPPLEMENTAL RESPONSE AND REQUEST FOR NOTIFICATION OF COMPLETION OF CORRECTIVE ACTION:

EVALUATION OF SUPPLEMENTAL RESPONSE

The Supplemental Response of June 3, 1997 has been evaluated. The policy statement was provided in this response. As a result of the analysis of impact on existing QMPs, it was recommended that YMP-USGS-QMP-4.01, R9, Procurement Document Control/Receipt of Procurements, be clarified.

NOTE: The original 6/3/97 response was misplaced. On 6/27/97 a replacement of the 6/3/97 response was provided to the OQA On-Site Representative.

REQUEST FOR NOTIFICATION OF COMPLETION OF CORRECTIVE ACTION

As a result of discussions between OQA/QATSS and USGS management, it was agreed that the final corrective action would be approval and issuance of the modification to QMP-4.01. The modification to QMP-4.01, addressing the issues as stated in the 6/3/97 supplemental response, will then be processed according to YMP-USGS-QMP-5.03, R9, Development and Maintenance of QMPs. Please provide notification to the QAR (Donna Sinks) by September 5, 1997 that the modification has been approved.

Notification of completion of corrective action due by 9/5/97.

Response accepted: Donna J. Sinks Date: 8/11/97
Donna J. Sinks, QAR, OQA On-Site Representative

Block 21 (according to AP-16.10.R2):

Response accepted: [Signature] Date: 8/20/97
Director, OQA

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OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
DEFICIENCY DOCUMENT ENCODING FORM

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1. Document No. USIGISI 1961 D10104 00
Issuing Org. Code _____
Fiscal Yr. (last 2 digits) _____
Document Type _____
Seq. Number _____
Extension number (for multiple deficiencies) _____

Document Type Codes:

C - Corrective Action Request
D - Deficiency Report
P - Performance Report
N - Nonconformance Report

O - Other: NRC commitments, Vendor documents
A - Deficiency closed during audit
S - Deficiency closed during surveillance
T - STIR

2. Initiation Date 06/13/96 (MM/DD/YY)

3. Deficiency Code: 07D1 *

Deficiency Code: *

Deficiency Code: *

4. Deficiency Cause Code: 061B *

Deficiency Cause Code: *

Deficiency Cause Code: *

5. Hardware Code: (if applicable) *

6. Supplier: (if applicable):

7. Miscellaneous: (if applicable):

8. Data File Review:

Open deficiency found: No Yes - DD# USGS-96-P015 (not quite the same)

Three or more recurring deficiencies in the same organization noted in last 4 quarters? No Yes

If Yes, STIR initiated? Yes - STIR No. NA
 No - If No, provide justification:

NA

OAR Martha H Mustard Date 6-13-96

* See latest revision of Trending Codes List

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NOTIFICATION OF COMPLETION

This is a supplemental response to points which were identified in the verification of this Deficiency Report. For the procurements of (1) Dr. Norman Abrahamson, 1434-CR-96-SA-0405, (2) Dr. John Schneider, 1434-CR-96-SA-0307, (3) Dr. Walter Silva, 1434-CR-96-SA-0453, (4 & 5) Dr. Lawrence Edwards, 1434-CR-96-SA-00591, and 1434-CR-96-SA-00660, and (6) Dr. Yuri Amelin, 1434-CR-96-SA-01064, a waiver was obtained for each one based on a limited scope effort. These have been turned over to the OQA representative for signature. The second point involved the blanks on the sole source justification where the contracting officer was to have signed. The contracting officer must sign the original but it does not come back to the Administrative office. Therefore the statement "Signature is on file in Central Region Procurements" together with initials of the Administrative Officer and the date is written in the space provided for the signature. The last point was that on 1434-CR-96-SA-00371, the wrong form was used for reviewer selection. The correct one was placed in the file but the date was past the time of the procurement so, the correct form has been annotated to reflect the Deficiency Report and why the problem was present.

RESPONSE BY:

Barbara Hersh
Barbara Hersh, Procurement/Data Coordinator

Date 9/2/97

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NOTE: a previous version of the DR form was used when the DR was issued; corresponding blocks are noted

Block 27 - Corrective Action Verified (currently Block 22):

The following verification of corrective actions for USGS-96-D004 was completed as follows:

Block 12 (currently Block 14) - Remedial Actions:

- A verification of completion of the final Remedial Actions for procurement files is presented in Attachment F. Each issue and its corresponding remedial action are identified in the right-hand column of the attachment.
- Additionally, related deficiency USGS-97-D003 (receiving acceptance reports) was closed 7/16/97.
- During completion of the remedial actions for Dr. Walter Silva (Pacific Engineering and Analysis), it was noted a ratification dated 11/14/95 was prepared and signed and placed in the procurement file for 1434-CR-SA-00453, noting that there was a lack of procurement document for FY96 (although there had been one [1435-WR-95-SA-0479] in place for FY95). This should have been documented as a deficiency. As a result, a memorandum dated 9/22/97 from the USGS Planning and Support Program Chief was prepared and placed in procurement file 1434-CR-96-SA-00453 which explains the ratification and references this DR as the method to document this deficient condition.
- All appropriate documentation described above and in Attachment F have been added to the respective procurement records packages and will be submitted to the Records Processing Center.

Block 18 (currently Block 15- Extent of Condition) - Investigative Actions:

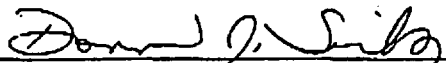
Response of 10/2/96 accepted. Inclusion of additional investigative actions for FY97 procurements was proposed in the 3/31/97 amended response. However, on 4/24/97 the USGS QA Office determined that it was not necessary to examine FY97 procurements because of the issuance of YMP-USGS-QMP-4.01, R8, which provided new guidance for purchase agreements for augmented staff.

Block 20 (currently Block 17) - Action to Preclude Recurrence:

- The final Action to Preclude Recurrence was verified. Modification #1 to YMP-USGS-QMP-4.01, R9 (Attachment G) was approved 8/12/97 and was effective 8/20/97. The final modification was slightly different from the suggested modification as stated in the response of 6/3/97. The final wording was a result of a meeting held 7/8/97 with the OQA On-site Representatives, and USGS Engineering Assurance and management staff.
- In addition, a memorandum to ESIP personnel from G.L. Ducret was sent 10/25/96 reminding staff to complete receiving acceptance for services.

As a result of the verification of completion of corrective actions, it is recommended that this DR be closed.

Submitted by:



Donna Sinks, OQA On-site Representative

Date:

9/23/97