



Department of Energy

Yucca Mountain Project Office

P. O. Box 98608

Las Vegas, NV 89193-8608

WBS 1.2.9.3

QA

OCT 22 1990

Larry R. Hayes
Technical Project Officer
for Yucca Mountain Project
U.S. Geological Survey
101 Convention Center Drive
Suite 860
Las Vegas, NV 89109

EVALUATION OF U.S. GEOLOGICAL SURVEY'S (USGS) AMENDED RESPONSES TO STANDARD DEFICIENCY REPORT (SDR) 135 RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE (PROJECT OFFICE) QUALITY ASSURANCE (QA) AUDIT 88-03 OF USGS

References: (1) Letter, Chaney to Horton, dtd. 4/30/90
(2) Letter, Appel to Horton, dtd. 10/2/90

The Project Office QA staff has evaluated USGS's Corrective Action Review Board's update to SDR 135, submitted by Reference 1 letter, and USGS's update to SDR 135, submitted by Reference 2 letter. The amended responses to SDR 135 have been determined to be satisfactory, with USGS's committed scheduled corrective action completion date of December 31, 1990.

Based on the commitments contained in the original USGS Corrective Action Report (CAR) 88-01, issued on June 7, 1988, the amended responses to SDR 135, dated June 23, 1989, and April 30, 1990, the Project Office QA staff satisfactorily verified Part I and Part III, Items A, B, and C as follows:

Part I

Verified by review of purchase documents during Surveillance YMP-SR-90-038 of USGS, that the Central Region Administrative Division processes all QA procurements for the Yucca Mountain Project, except for computer and scientific instrumentation procurements over \$50,000, which are processed by the Reston, Virginia office.

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Larry R. Hayes

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Part III

- A. Verified Quality Management Procedure (QMP)-4.01, Paragraph 5.1, was revised to include a Requisition Request (Attachment I) which documents the procurement request, technical and QA reviews, and approvals prior to initiating a requisition.
- B. Verified QMP-7.01, Paragraphs 5.2.2 and 5.2.3, contain the requirements for QA review of bid evaluations.
- C. Verified QMP-4.01, Paragraph 5.4.1, requires QA to document their review of the final procurement document prior to issuance by the procurement unit.

In order for the Project Office to close SDR 135, the following corrective actions require verification by the Project Office QA staff:

Parts II and III

Verification that the following categories of personnel were trained on revised QMPs-1.01, 2.02, 3.02, 4.01, 6.01, 7.01, 15.01, 16.01, 17.01, 18.01, and 18.02:

1. Technical Personnel
2. Central Region Administrative Division Personnel that Process Yucca Mountain Project Procurements
3. Yucca Mountain Project Procurement Approval Authorities (management, QA Manager, and their delegates)

Review of prior procurements:

1. Verification that procurement documents generated subsequent to May 3, 1989, were reviewed in accordance with the corrective action specified by USGS NCR-90-9.
2. Verification that the suppliers of current (open) procurement documents for quality-affecting items and services are on the USGS Approved Vendors List.
3. Verification, by sampling, that procurement documents processed subsequent to May 3, 1989, were provided to the USGS Local Records Center.

OCT 22 1990

Larry R. Hayes

-3-

Verification of completion of the corrective action will be performed after the effective date provided. Extensions must be requested in writing, with appropriate justification, prior to the due date. Please send a copy of all SDR correspondence to Nita J. Brogan, Science Applications International Corporation, 101 Convention Center Drive, Las Vegas, Nevada 89109, and Ralph W. Gray, U.S. Department of Energy, P.O. Box 98518, Las Vegas, Nevada 89193.

If you have any questions, please contact either Catherine E. Hampton at 794-7973 or Donald J. Harris at 794-7356 of the Yucca Mountain Project QA staff.

N. Volchuk for

Donald G. Horton, Director
Quality Assurance
Yucca Mountain Project Office

YMP:CEH-4168

Enclosures:

1. SDR 135
2. Ltr 4/30/90 Chaney to Horton
3. Ltr 10/2/90 Appel to Horton

cc w/encls:

Ralph Stein, HQ (RW-1) FORS
K. R. Hooks, NRC, Washington, DC 
S. W. Zimmerman, NWPO, Carson City, NV
T. H. Chaney, USGS, Denver, CO
D. J. Harris, Harza, Las Vegas, NV, 517/T-06

cc w/o encls:

J. W. Gilray, NRC, Las Vegas, NV
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08

WMPO STANDARD DEFICIENCY REPORT

N-QA-C38
3/87

1 Date 4/28/88 | 2 Severity Level 1 2 3 | Page 1 of 3

3 Discovered During Audit No. 88-3 | 3a Identified By P. J. Ruth | 3b Branch Chief Concurrence Date N/A | 4 SDR No. 135 | Rev. 0

5 Organization USGS-Menlo Park | 6 Person(s) Contacted Karen Vorganstern | 7 Response Due Date is 20 Working Days from Date of Transmittal

8 Requirement (Audit Checklist Reference, if Applicable)
(Refer to Audit checklist Item No. 4.3-4.6 and 4.11-4.17)
A. NNWSI-USGS-QAPP, R.4, Section 4, Procurement Document Control, Paragraph 4.2, states in part, "The USGS shall prepare work agreements,

9 Deficiency
A. There was no objective evidence that a work agreement, memorandum of understanding, or an interagency agreement existed for Requisition No. 9380-1053, Vendor, Ben Schulein.

10 Recommended Action(s): Remedial Investigative Corrective
1. Take actions to correct the specific deficiencies noted on the SDR.
2. Determine if there are any other procurement documents with the

11 QAE/Lead Auditor Date [Signature] 5/1/88 | 12 Branch Manager Date [Signature] 5/18/88 | 13 Project Quality Mgr. Date [Signature] 5/23/88

14 Remedial/Investigative Action(s)
A Corrective Action Report (CAR) was issued on 6-7-88 due to recurring deficiencies in the procurement process. This CAR will be revised to place greater emphasis on procurement problems that have occurred at USGS field offices. Greater emphasis will also be placed on the need for more active involvement by upper- (see page 3)
15 Effective Date 7-15-88

16 Cause of the Condition & Corrective Action to Prevent Recurrence
The cause and the corrective action to prevent recurrence for these deficiencies will be determined by the response to the internal CAR (USGS-CAR-88-01)
17 Effective Date N/A

18 Signature/Date [Signature] 7/1/88

19 Response	<input type="checkbox"/> Accept <input type="checkbox"/> Reject	<input checked="" type="checkbox"/> Amended Response	QAE/Lead Auditor/Date [Signature] 4/20/89	Branch Manager/Date [Signature] 2082/89
20 Amended Response	<input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject		QAE/Lead Auditor/Date [Signature] 7/23/89	Branch Manager/Date [Signature] F-21-89
21 Verification	<input type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory		QAE/Lead Auditor/Date	Branch Manager/Date

22 Remarks

23 QA CLOSURE | QAE/Lead Auditor/Date | Branch Manager/Date | PQM/Date

Completed by Originating QA Organization [Signature] 5/1/88

Completed by Organization in Blous 5

Completed by Orgin QA Org.

Con.



WMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

N-QA-038
10/86

SDR No. 135

Rev. 0

Page 2 of 3

8 Requirement (continued)

memorandums of understanding, interagency agreements, management agreements, or other suitable documents."

B. NNWSI-USGS-QMP-4.01, R.1, Paragraph 4.1.1, requires the requestor to include the QA Level and the Scientific Investigation Plan (SIP) No. on the USGS Requisition.

C. Paragraph 4.1.3 requires that requisition documents include or reference applicable regulatory requirements, site investigation basis and other requirements that are necessary to assure adequate quality for the procurement of the material, equipment, or services utilized on the NNWSI Project.

D. Paragraph 4.1.4 requires that Level I items/services, requisition documents include provisions from the following Paragraphs, 4.1.4.1 through 4.1.4.5.

E. Paragraph 4.3.1 requires the requestor/PI to complete the USGS Requisition Form D1-1, Attachment 1, and the NNWSI Technical Review of Procurement Documents form, Attachment 2.

F. Paragraph 4.3.2 requires the NNWSI Branch Administrative Officer to assign a controlled requisition number to both Attachments 1 and 2 and to obtain the approval signature of the Chief, Branch of NNWSI.

G. Paragraph 4.3.3, requires the QA Manager to review the requisition in accordance with Attachment 3 Checklist for USGS Procurement Document QA Review. Upon satisfactory completion of the review, the QA Manager is to sign Attachment 3.

H. Paragraph 4.3.5 requires the USGS QA Manager to review all Level I and II contracts and purchase orders for QA compliance with the approved requisition prior to their release and to send copies of all Level I procurement documents and any subsequent changes to DOE/WMPO.

I. NNWSI-USGS-QAPP, R.4, Section 4, Paragraph 4.6, requires the USGS to forward to the WMPO QA (QASC-Audits and Surveillance Branch Manager) one copy of purchase documents, and changes thereto, as issued, when purchases involve QA Level I items or services.

9 Deficiency (continued)

B. There was no QA Level or SIP numbers identified on Requisition Nos. 9380-1017, 9380-1018, and 9380-1053

C. Requisition No. 9380-1053 was determined to be a QA Level I activity. No reference has been made to the applicable regulatory requirements, site investigation basis and any other requirements that are necessary to assure adequate quality for



WMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

N-QA-038
10/86

SDR No. 135

Rev. 0

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9 Deficiency (continued)

the procurement.

D. Requisition No. 9380-1053, which has been identified as a QA Level I does not have any of the applicable provisions identified in Paragraph 4.1.4.1 through 4.1.4.5, Scope of Work Technical requirements, QA Requirements, Rights of Access, and Documentation requirements.

E. NNWSI Technical Review of Procurement Documents, Attachment 2 has not been prepared as required for Requisition No. 9380-1053.

F. The three (3) requisitions (Nos. 9380-1017, 9380-1018, and 9380-1053) that were reviewed during the course of the audit did not have the approval signature of the Chief, NNWSI.

G. Attachment 3 checklist for USGS Procurement Document QA Review has not been prepared for Requisition No. 9380-1053.

H. There is no evidence that the USGS QA Manager has reviewed Requisition No. 9380-1053 for QA compliance with the approved requisition prior to release. There is also no objective that copies of Level I procurement documents or any subsequent changes were sent to DOE/WMPO by the USGS QA office as required.

I. There is no objective evidence the USGS has forwarded to the WMPO QA (QASC-Audits and Surveillance Branch Manager) a copy of purchase documents and changes thereto, as issued, when purchases involve QA Level I items or services. An example is Requisition No. 9380-1053, which has been determined to be for a QA Level I activity.

10 Recommended Actions (continued)

identical and/or similiar deficiencies noted in this SDR.

3. Identify the actions to be taken to identify the cause of the conditions and what will be done to prevent recurrence.

4. Determine the impact of this deficiency on the quality of any work performed.

14. Remedial/Investigative Action(s) (continued)

level management in the development of either a Project Plan or individual unit procedures delineating the procurement process.



United States Department of the Interior



GEOLOGICAL SURVEY
BOX 25046 M.S. 425
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

WBS #: 1.2.9.3
QA: "QA"
June 23, 1989

IN REPLY REFER TO:

Carl P. Gertz
Project Manager
Yucca Mountain Project Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas, NV 89193-8518

ATTENTION: E. L. Willmot, Acting Project Quality Manager

SUBJECT: AMENDED RESPONSE TO STANDARD DEFICIENCY REPORT (SDR) 135

REFERENCE: James Blaylock letter to Larry R. Hayes, dated May 23, 1989, subject: YMPO Project Office Evaluation of the Response to SDR 135, and USGS CAR-88-01

Dear Carl:

An amended response to the subject SDR is enclosed which addresses item 6 of the referenced correspondence. The USGS has a concern with items 1 through 5 as explained below. A review of our notes from the March 21, 1989 meeting between USGS personnel and DOE Project Office on the acceptability of the response, indicates the referenced correspondence is not in agreement with the agreements made at that meeting.

Item 1: The USGS does not see the wisdom of correcting each specific deficiency identified within each of the CAR source deficiency documents. A justification for this decision was contained in the CAR response and is repeated here for emphasis.

"The Quality Assurance Office will review the current service contracts providing QA level I or II support to the Yucca Mountain Project to determine QA adequacy of the contractual provisions. This action is comprehensive enough to include all procurement transactions for which a modification to an existing contract may be used as a remedial action for inadequate contractual provisions. Completed procurement transactions (both service and items) are specifically excluded. The ultimate purpose of the QA controls on procurements is to assure that proper provisions are included in QA level I and II procurements to assure that the item or service meets the needs of the Yucca Mountain Project. Whether all applicable provisions were included in a procurement or not is immaterial after the procurement is complete; the procurement process cannot be used as a positive instrument to correct deficiencies in these prior procurements. The adequacy of the item or service itself,

rather than the adequacy of the procurement documents is the relevant point. Use of these purchased items and services are subject to other controls of the QA Program (calibration, special handling, scientific and engineering software, nonconformance reports, scientific investigation close-out, records review, technical reviews, surveillances and audits)."

Furthermore, the Project Office current position is that all work to date is subject to AP-5.9Q for qualification before it can be used to directly support licensing. This Project-level position further supports the USGS decision not to retro-fit all deficient procurement documents but only those that are still pertinent.

Item 2: The USGS has performed a detailed analysis of the deficiencies and identified the root causes of the procurement deficiencies. These root causes were identified as: lack of awareness of the procedures, infrequent use of the procedures, inadequate training, and inadequate control over the Administrative Division. A decentralized organization was not one of the identified root causes. The Project Office has provided no evidence for its "feelings" that decentralized organization was the root cause.

However, regardless of whether it was a root cause, the corrective action commitments within the CAR response (pp. 2-3, Administrative Changes, I. Administrative Office and II. Procurement Unit of the Administrative Division) already address the description requested in the amended response. The Administrative Offices are limited to one per division and the personnel of the Procurement Unit of the Administrative Division are limited to those who are trained in the procedures and have their position descriptions revised to include YMP duties.

The reference to the Bureau of Reclamation in this context was inappropriate. The Bureau of Reclamation is not a division of the USGS but rather operates at a sub-tier level to the USGS with their own USGS-approved Quality Assurance Program.

Item 3: This item is substantially the same as item 1. Also there appears to be a typographical error in the fourth sentence. It is assumed that "open" should be replaced by "closed" in order to make the sentence coherent. The USGS is committed to reviewing all open QA level I and II contracts. This is the remedial action that the USGS considers warranted. Again, using the logic explained under item 1, no further action is warranted concerning closed procurement documents.

Additionally, it is deemed unnecessary to initiate individual nonconformance reports on each specific deficiency. The CAR is an upper-level QA deficiency document. If the corrective action commitments for a CAR are sufficiently comprehensive to include the appropriate remedial actions for the source deficiency documents, then the NCRs become redundant. There is no reason to initiate an NCR when the appropriate remedial action commitment already exists.

Item 4: The CAR response stated "The Quality Assurance Manager shall be involved in bid evaluations, solicitations, and changes to procurement documents, as applicable,". This was stated in this manner because the responsibilities for these actions lie directly with the Quality Assurance Manager. No other position has been set up by title to fulfill these duties, however the Quality Assurance Manager can delegate the authority to fulfill his duties to his staff members, as appropriate. The QA Manager's ability to manage the QA Program is not an issue relevant to the response to this SDR.

Item 5: The root cause of the violation of the approved vendor's list was identified by the CAR response as lack of proper procurement document processing. The statement that it was not identified was made within the "analysis of deficiencies" section of the response and must be taken in context. It referred to previous identification already made within the source deficiency documents.

Sincerely,



J.R. Willmon,
Quality Assurance Manager
Yucca Mountain Project

MHM/JRW/aa
Enclosure

cc:

L. R. Hayes, USGS, Denver, Atten: M. Simpson
J. W. Estella, SAIC/T&MSS Project QA Engineering
R. W. Gray, IMD, NV
S. Berkel, IMD, NV
J. J. Brogan
USGS LRC
QA File 3.16.01 USGS-CAR-88-01
QA logbook

AMENDED RESPONSE TO SDR-135

NNWSI-USGS-QMP-4.01 and YMP-USGS-QMP-7.01 have been revised to address the requirements stated within item 6 of the amendment request letter. These revised procedures have already been reviewed and approved. The effective dates are June 23, 1989.



United States Department of the Interior

I-200756
TAKE PRIDE IN AMERICA

GEOLOGICAL SURVEY
BOX 25046 M.S. 425
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

WBS #: 1.2.9.3.2
QA: QA

IN REPLY REFER TO:

April 30, 1990

Donald Horton, Quality Assurance Director,
Yucca Mountain Project Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas, NV 89193-8518

SUBJECT: UPDATE TO STANDARD DEFICIENCY REPORT (SDR) 135

Dear Don:

The USGS response to SDR-135 refers to an internal USGS Corrective Action Report (USGS-CAR-88-01) for cause, remedial/investigative actions, actions to prevent recurrence. An internal investigation has determined that the essential corrective actions of the 1-13-89 response to USGS-CAR-88-01 are complete with minor modifications. An updated response to the CAR which reflects these modifications has been approved by the CAR Review Board and a copy is enclosed for your information. The CAR is considered ready for verification.

If you have any questions, please call Martha Mustard of my staff at FTS-776-1418.

T.H. Chapey
T.H. Chapey

Horton
W/C not 10/0
enc

MHM/THC/aa

Enclosure

- cc: L.R. Hayes, USGS, Denver, CO
- M.H. Mustard, USGS, Denver, CO
- J.J. Brogan, SAIC, Las Vegas, NV
- R.W. Gray, IMD, NV
- Susan Berkel, IMD, NV
- A.M. Whiteside, SAIC, Golden, CO
- LRC File 3.16.01-3 SDR-135

5/4/90

ACTION _____

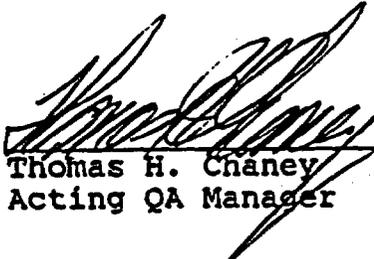
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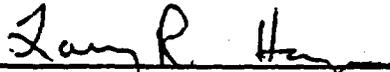
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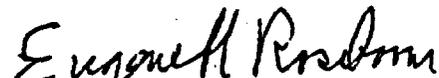
CAR Board approval of the 4-11-90 response update for USGS-CAR-88-01.


Thomas H. Chaney
Acting QA Manager

4/11/90
Date


Larry R. Hayes
Technical Project Officer

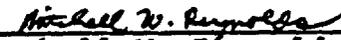
4/11/90
Date


Eugene H. Roseboom
Assistant Director for
Engineering Geology

4/23/90
Date


Verne R. Schneider
Assistant Chief Hydrologist
for Program Coordination and
Technical Support

4/23/90
Date


Mitchell W. Reynolds
Chief, Office of Regional
Geology

04.20.90
Date

An investigation was conducted to determine the status and applicability of commitment actions outlined in the 1-13-89 Corrective Action Review Board Management Plan. The investigation determined that the essential corrective actions of the 1-13-89 CAR response are complete with slight modifications, and related remedial actions will be taken as part of the open USGS-NCR-90-09. The modifications are listed below, followed by the status of actions as identified in the 1-13-89 plan. With the noted modifications to the 1-13-89 plan, no other actions are warranted for this CAR.

MODIFICATIONS TO 1-13-89 PLAN:

- o The use of a centralized Administrative Division Procurement Unit is in effect for all QA procurements with the exception of computer and scientific instrumentation procurements over \$50,000. Administrative Division policy requires these procurements to be handled by the Reston office; Central Region Administrative Division handles all other QA procurements for YMP.
- o No changes to position descriptions for Administrative Division procurement personnel handling YMP procurements were considered necessary "to reflect the additional duties assigned to these personnel". The "additional duties" involve 1) coordinating with the QA Office and technical personnel at specified points in the procurement process and 2) providing records management support. These responsibilities do not justify position description amendments.
- o Training for Administrative Division procurement personnel was limited to Central Region Administrative Division Procurement Unit. The Reston Office handles only a very limited number of high-cost procurements which involve coordination with the technical personnel. QA involvement and records management for these procurements can be easily arranged on an individual basis.
- o Review of "current service contracts" as of 1-13-89 is no longer warranted. The contracts were implemented prior to obtaining a qualified QA Program (QAPP-01, R5/5-3-89). Presently, procurement documents generated since 5-3-89 are being reviewed as part of the corrective actions for USGS-NCR-90-09. This comprehensive review will identify procurement-processing problems as well as records management problems, and remedial actions will be taken on a case-by-case basis.

STATUS OF ACTIONS:

ADMINISTRATIVE CHANGES

I. ADMINISTRATIVE OFFICE

The administrative offices for NHP and the Geologic Division have been designated.

II. PROCUREMENT UNIT OF THE ADMINISTRATIVE DIVISION

Central Region Administrative Division Procurement Unit personnel handling Yucca Mountain procurements have been trained. The functional reporting responsibility has been recognized. Resources are deemed adequate at this time to support the YMP-USGS procurement activity. For those procurements being handled by the Reston office, the QA Office coordinates through the technical personnel to assure the required reviews are complete and documented. Limited scope activity and an established means of coordination obviate the need for training for the Reston office procurement personnel.

Position descriptions amendments are no longer deemed necessary for these personnel. They are not limited to just YMP activities, and the training that was conducted is sufficient to provide the awareness needed for coordination or routing of YMP-USGS procurement documents.

QA audits and surveillances of procurement activities continue.

- o Final procurements are not issued without the appropriate QA and technical approvals.
- o The Administrative Division is providing legible, first-generation copies of procurement documents to the administrative offices in NHP and the Geologic Division.
- o The QA Manager is involved in the bid evaluations, solicitations, and changes to procurement documents, as applicable.

III. PROCUREMENT DOCUMENT CHANGES

- A. The Requisition Request form was added to QMP-4.01 and is being used as required.
- B. Proposals are to be evaluated according to the Solicitation Evaluation form (QMP-7.01, R4, Att. 2).

- C. The QA Office documents their review of the final procurement document on QMP-4.01 R3 Attachment 3 prior to issuance by the Procurement Unit.

QUALITY MANAGEMENT PROCEDURE (QMP) CHANGES

QMP-4.01 R3 was issued and became effective 6-23-89.

TRAINING

Necessary classroom instruction and reading assignments were completed for technical personnel, Administrative Division Procurement Unit personnel, Yucca Mountain Project administrative office personnel, and YMP-USGS management personnel.

REVIEW OF PRIOR PROCUREMENTS

The service contracts that were current as of 1-13-89 no longer require a QA review. The deficiencies first identified within this CAR occurred prior to obtaining the qualified QA program (QAPP-01, R5/5-3-89). Presently, procurement documents generated since 5-3-89 are being reviewed as part of the corrective actions for USGS-NCR-90-09. This comprehensive review will identify procurement-processing problems as well as records management problems, and remedial actions will be taken on a case-by-case basis.

ANALYSIS OF DEFICIENCIES

The YMP-USGS Approved Vendors List has been established and continues to be updated and issued as required.

IDENTIFICATION OF ROOT CAUSES

The root causes identified in the 1-13-89 plan were incomplete training and inadequate control of the Administrative Division Procurement Unit by the Yucca Mountain Project. These causes have been addressed by training and continual coordination with Central Region Administrative Division Procurement Unit personnel.

Martha H. Mustard 4-11-90
Martha H. Mustard Date
QA Specialist, QA Office

Ardell M. Whiteside 4-11-90
Ardell M. Whiteside Date
QA Advisor to the YMP-USGS TPO



United States Department of the Interior

GEOLOGICAL SURVEY
BOX 25046 M.S. 425
DENVER FEDERAL CENTER
DENVER, COLORADO 80225



IN REPLY REFER TO:

WBS # 1.2.9.3.2
QA:QA

October 2, 1990

D. G. Horton, Quality Assurance Director,
Yucca Mountain Project Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas, NV 89193-8518

SUBJECT: UPDATE TO STANDARD DEFICIENCY REPORT (SDR)
135
REFERENCE: April 30, 1990 letter from T.H. Chaney, USGS,
to Don Horton, same subject

Dear Don:

The USGS response to SDR-135 refers to an internal Corrective Action Report (USGS-CAR-88-01) for cause, remedial/investigative actions, and actions to prevent recurrence. In the referenced letter, the USGS informed the Project Office that CAR-88-01 had been closed based on an updated response to the CAR and therefore the SDR was ready for verification.

The updated response to the CAR transferred responsibility for the review of procurement documents to an internal nonconformance report (USGS-NCR-90-09). Subsequent discussions with the QA Engineer responsible for SDR-135 indicate that the Project Office considers the review of procurement documents to still be an integral part of the SDR response. Therefore the SDR is not ready for verification yet.

The following excerpt from the supplemental response to USGS-NCR-90-09 constitutes the outstanding commitments for SDR-135.

"Reviews of procurement packages for FY89 are limited to those procurements that were still in process on 5-3-89 or were initiated after 5-3-89. Reviews of such record packages initiated before implementation of QMP-4.01, R3 will address whether appropriate clauses were included in the procurement to address QA requirements and whether the vendor was qualified, if applicable. Procurements initiated after implementation of QMP-4.01, R3 relied on the QA review

RECEIVED

OCT 05 1990

Letter to D. G. Horton, October 2, 1990

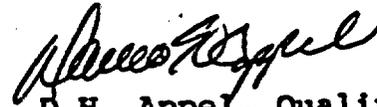
Page 2

of the requisition request to determine if appropriate QA requirements were included and whether the vendor needed qualification."

The disposition for USGS-NCR-90-09 currently schedules completion of these QA reviews by December 31, 1990.

If you have any questions regarding this update, please contact Martha H. Mustard of my staff or myself at FTS 776-1418.

Sincerely,



D.H. Appel, Quality Assurance Manager, Yucca Mountain Project

MHM/DHA

cc: L.R. Hayes, USGS, Denver, CO
D. C. Gillies, USGS, Denver, CO
K. W. Causseaux, USGS, Denver, CO
J. B. Woolverton, USGS, Denver, CO
D. Harris, SAIC, Las Vegas, NV
J.J. Brogan, SAIC, Las Vegas, NV
A.M. Whiteside, SAIC, Golden, CO
R.W. Gray, IMD, NV
Susan Berkel, IMD, NV
LRC file 3.16.01-3 SDR-135
QA logbook