



Department of Energy
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WBS 1.2.9.3

JUL 0 1 1992

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U.S. DEPARTMENT OF ENERGY (DOE) YUCCA MOUNTAIN SITE CHARACTERIZATION PROJECT
OFFICE (YMPO) RESPONSE TO STATE OF NEVADA INQUIRY

Reference: Ltr, Loux to Gertz, dtd 4/22/92

Review of the referenced letter identifies two key issues involving the U.S. Geological Survey (USGS). DOE's YMPO position on these issues are as follows:

ISSUE 1 - Scientific Work Conducted by USGS at Yucca Mountain, Nevada.

The USGS has many scientists conducting research at the Nevada Test Site, (NTS) with only a portion of whom are associated with the Yucca Mountain Site Characterization Project (YMP). Scientists not associated with the YMP program are not committed to work to the Office of Civilian Radioactive Waste Management (OCRWM), USGS/YMP quality assurance (QA) program. As in any scientific community, USGS scientists are not precluded from sharing information with the USGS scientists working on the YMP program.

Access for all USGS scientists is afforded by the DOE regulations governing NTS operations. As the YMP work is only one of many activities conducted at the NTS, it is not mandatory for USGS scientists to gain permission from YMP for access to the NTS. All personnel must comply with the DOE security badging and rules governing different levels of access to the site.

ISSUE 2 - Scientific Work Conducted to Support Study Plan 8.3.1.2.2.6.

For scientists providing support for YMP study plans, the scientific work must comply with applicable OCRWM USGS/YMP QA program requirements and obtain authorization to conduct work activities through management controls such as study plans, planning and control system, YMP job packages, YMP/USGS technical procedures, etc.

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For this particular activity, the scientific research was conducted in support of Study Plan 8.3.1.2.2.6. Prior to the DOE/YMP audit, the USGS/YMP QA program had identified deficiencies with Activity 8.3.1.2.2.6 and the applicable rules governing the conduct of work. This condition was documented and is being addressed in a USGS/YMP Corrective Action Report (CAR) 92-04 in accordance with the requirements of the USGS/YMP QA program. This CAR covers the conditions described in your letter.

DOE's Yucca Mountain Quality Assurance Division (YMQAD) will perform a surveillance upon closure of USGS CAR 92-04 to verify the adequacy and effectiveness of USGS's investigation and corrective actions. As the State of Nevada is on distribution for all YMQAD surveillance reports, closure of the CAR can be tracked by your office.

As the referenced correspondence also questioned, "Are there other instances in the YMP program where site investigations are being performed by personnel outside the YMP that directly support a study plan?", YMQAD and USGS/YMP QA completed a review of audit and surveillance reports since the date of DOE's approval of the USGS/YMP QA program approval (May 1989). Since that time, a minimum of 45 study plans have been evaluated by YMQAD with no similar deficiencies identified. A total of 33 YMQAD audits and 98 surveillances covering 12 organizations were conducted since May 1989. No similar circumstances were identified.

During the conduct of DOE YMQAD Audit YMP-92-13, conducted April 1-10, 1992, the audit team expanded its investigation of USGS CAR 92-04 to look at the evaluation of other technical activities under the USGS/YMP QA Program. Four USGS audit reports and five surveillance reports were reviewed during the audit to determine if noncompliance with USGS Quality Management Procedures by technical personnel was a pervasive problem. The review of these reports indicated no other problems of this nature have been uncovered by USGS QA. Therefore, it is the conclusion of YMQAD and the USGS/YMP QA organization that this is an isolated case and is not indicative of a program attitude towards less adherence to QA requirements as suggested in the referenced letter.

YMQAD:CEH-4149

Maxwell Blanchard
for Carl P. Gertz
Project Manager

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