



Department of Energy

Nevada Operations Office
P. O. Box 98518
Las Vegas, NV 89193-8518

WBS 1.2.9.3
QA

JAN 29 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

CLOSURE OF STANDARD DEFICIENCY REPORT (SDR) 162, REVISION 0, RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE QUALITY ASSURANCE AUDIT 88-04 OF U.S. GEOLOGICAL SURVEY

SDR 162, Revision 0, has been closed based on satisfactory verification of completed corrective actions. A copy of the SDR is enclosed for your files.

If you have any questions, please contact James Blaylock of my staff at (702) 794-7913 or FTS 544-7913 or Daniel A. Klimas of Science Applications International Corporation at (702) 794-7881 or FTS 544-7881.

James Blaylock for
Donald G. Horton, Director
Quality Assurance Division
Yucca Mountain Project Office

YMP:JB-1469

Enclosure:
SDR 162, Revision 0

cc w/encl:
Ralph Stein, HQ (RW-30) FORS
D. E. Shelor, HQ (RW-3) FORS
N. J. Brogan, SAIC, Las Vegas, NV, 517/T-22
S. R. Dana, SAIC, Las Vegas, NV, 517/T-06
D. A. Klimas, SAIC, Las Vegas, NV, 517/T-06
J. H. Nelson, SAIC, Las Vegas, NV, 517/T-04
Cynthia Robertson, SAIC, Las Vegas, NV, 517/T-22
J. R. Willmon, USGS, Denver, CO
S. W. Zimmerman, NWFO, Carson City, NV
J. E. Kennedy, NRC, Washington, DC

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Larry R. Hayes

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JAN 29 1990

cc w/o encl:

K. G. Sommer, HQ (RW-3) FORS
D. O. Porter, SAIC, Golden, CO
Alan Flint, USGS, NTS
J. W. Gilray, NRC, Las Vegas, NV

WMPO STANDARD DEFICIENCY REPORT

N-CA-C38
3/87

Completed by Originating QA Organization 882300

1 Date June 15, 1988	2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3	Page 1 of 2
3 Discovered During WMPO-Audit 88-4	3a Identified By W. B. Mansel	3b Branch Chief Concurrence Date
4 SDR No. 162		Rev. 0
5 Organization USGS-Denver	6 Person(s) Contacted A. M. Whiteside, J. R. Willmon, S.	7 Response Due Date is 20 Working Days from Date of Transmittal
8 Requirement (Audit Checklist Reference, if Applicable) Question 18-22, USGS QMP 18.01, Rev. 1, Para. 5.1.3 and 5.1.4; USGS-QAPP-01, Rev. 4, Para. 18.1.2.2, states that elements of an external organization's QA Program shall be audited at least annually or once during the life of the		
9 Deficiency There is no available objective evidence that any other external organizations besides U.S. Bureau of Reclamation have been audited during FY 88 nor are the organizations scheduled to be audited.		
10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective 1. Perform an audit of all USGS contactors on the approved vendors list.		

11 QAE/Lead Auditor Date <i>Daniel Klunas 7-25-88</i>	12 Branch Manager Date <i>W. B. Mansel 7/25/88</i>	13 Project Quality Mgr. Date <i>James Blaylock 7/25/88</i>
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14 Remedial/Investigative Action(s) See attached response for Blocks 14-17.	15 Effective Date _____
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16 Cause of the Condition & Corrective Action to Prevent Recurrence	17 Effective Date _____
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18 Signature/Date <i>Jay R. H...</i> 8/31/88	<i>J. R. Willmon 8/31/88</i>
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19 Response	<input type="checkbox"/> Accept <input type="checkbox"/> Reject	<input checked="" type="checkbox"/> Amended Response	QAE/Lead Auditor/Date <i>Dan Klunas 12-5-88</i>	Branch Manager/Date <i>W. B. Mansel 12-5-88</i>
20 Amended Response	<input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject		QAE/Lead Auditor/Date <i>Dan Klunas 5-14-89</i>	Branch Manager/Date <i>W. B. Mansel 19 May 89</i>
21 Verification	<input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory		QAE/Lead Auditor/Date <i>Dan Klunas 8-24-89</i>	Branch Manager/Date <i>J. W. Estell 8/30/89</i>
22 Remarks <i>UNREQUESTED AMENDED RESPONSE DATED AUGUST 1st 1989 Accepted</i> <i>FORMALLY</i> <i>verified vendors on AVL have been qualified as required.</i> <i>Petty-Ray Geophysical is INACTIVE status</i>				

23 QA CLOSURE	QAE/Lead Auditor/Date <i>Dan Klunas 8-24-89</i>	Branch Manager/Date <i>J. W. Estell 8/30/89</i>	PQM/Date <i>James Blaylock 8/30/89</i>
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6 Persons contacted (continued)

Shipley

8 Requirement (continued)

activity, whichever is shorter, and when determined necessary, a supplier's facility shall have an initial audit to determine both technical and QA capability and adequacy of personnel and implementation of the QA program.

9 Deficiency (continued)

Petty-Ray Geophysical, Martin-Marietta, and National Water Quality Lab have not been either initially or annually audited per the requirements stated in Section 18.0 in both the USGS-QAPP and USGS-QMP.

The provisions stated in USGS-QMP-7.01 and 7.03 do not provide relief from the requirements stated in Block 8 for the external organizations identified above.

10 Recommended Actions (continued)

2. Investigate to determine the impact on quality.
3. Organizations performing work for USGS should be scheduled to be audited during FY 88 and FY 89 to verify implementation of the QA program.

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

The USGS investigation reveals that there are two parts of the deficiency as stated in the SDR. The first part deals with "initial audits" of vendors and the USGS does not agree that there is a mandatory "initial audit" requirement. The second part deals with "annual audits" of external (direct subcontractor) organizations. The USGS review of the approved vendors lists indicates that none of the annual reevaluation dates are past due.

The majority of NNWSI-USGS purchases involve "commercial-grade" or off-the-shelf items. Therefore vendors that supply services are deemed the vendors that must be qualified in accordance with QMP-7.01 and the vendor services accepted in accordance with QMP-7.03.

Based upon a review of WMPO 88-9, R0 and R1, and QAPP-01, R4, Section 7 "Source Evaluation and Selection" initial selection methods are not limited to audits and the requirements stipulate that there are three approved methods for selecting vendors. These methods include the following:

- o Evaluation of the supplier's history
- o Supplier's current quality assurance records...
- o Supplier's technical and quality capability as determined by a direct evaluation...

Based upon the USGS review of WMPO 88-9, R0 and R1, and USGS QAPP-01, R4, the requirements contained in Section 7 for supplier performance evaluation are not consistent with the requirements of Section 18 that mandate annual evaluations of external (direct subcontractor) organizations. This is evidenced in the following examples from the WMPO 88-9 document:

Section 7, Para. 1.4. SUPPLIER PERFORMANCE EVALUATION, para. 1.4.2.1 "... purchaser shall ...establish measures to verify supplier's performance... The measures shall establish the extent of source surveillance and inspection activities."

Section 18, AUDITS, para. 1.1.2 "...Each Participating Organization ...shall conduct internal ...and external (direct subcontractor) audits of activities under its direct control..." and para. 1.2 Scheduling "...Each NNWSI Project Participant shall perform or arrange for annual evaluation of suppliers..."

The USGS is in compliance with the Section 7 requirements, and does not feel that quality has been adversely affected by the conflicting requirements of Sections 7 and 18. The approved vendors lists maintained by the QA Office identify the qualification method and re-evaluation due date for approved vendors. None of the vendors listed are overdue for re-evaluation at this time, therefore no remedial actions are warranted.

The approved vendors lists include the vendors listed in this SDR with the exception of Martin Marietta. This contract is identified within SDR 154 and will be evaluated as part of USGS-CAR-88-01. The QA Manager cannot determine the need for a qualification/performance evaluation until the corrective actions and investigations required by the CAR are defined and resolved. No additional actions are required as a direct result of SDR 162.

USGS RESPONSE TO WMPO STANDARD DEFICIENCY REPORT (SDR) NO. 162 (continued)

BLOCK 15: EFFECTIVE DATE: Not Applicable.

BLOCK 16: CAUSE OF THE CONDITION & CORRECTIVE ACTION TO PREVENT RECURRENCE:

The "annual evaluation" condition is the result of conflicting upper-tier QA planning document requirements as described in Block 14. The USGS will request additional guidance from the WMPO Project Quality Manager and also request that the WMPO QA Plan be updated to reflect the actual requirements that are to be enforced. No additional actions are warranted at this time, pending revision of the upper-tier QA documents and the subsequent revisions of the USGS implementing instructions as explained in the response to SDR 156.

BLOCK 17: EFFECTIVE DATE: USGS letter to WMPO PQM - September 24, 1988

AMENDED RESPONSE TO SDR-162
February 10, 1989

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

As given in original response with this addition:

The vendor Petty Ray is on the approved vendors list but is currently inactive. The vendor National Water Quality Laboratory is not yet due for an annual qualification survey.

BLOCK 15: EFFECTIVE DATE:

Not applicable.

BLOCK 16: CAUSE OF THE CONDITION AND PREVENTIVE ACTION TO PREVENT RECURRENCE:

As given in original response.

BLOCK 17: EFFECTIVE DATE:

As given in original response.



United States Department of the Interior



GEOLOGICAL SURVEY
BOX 25046 M.S. 421
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

IN REPLY REFER TO:

WBS 1.2.9.3
QA: "QA"

February 15, 1989

QA RECEIVED

FEB 22 1989

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

Atten: James Blaylock

SUBJECT: CORRECTION TO AMENDED RESPONSE TO SDR-151

REFERENCE: Larry R. Hayes letter to Carl P. Gertz, atten: James Blaylock, dated February 10, 1989, subject: AMENDED RESPONSES TO SDRs -143, -144, -145, -146, -147, -148, -151, -153, -154, -155, -156, -157, -161, and -162

The subject amended response contained an error. In the remedial actions (block 14) "QMPs" should read "technical procedures". Please consider this letter as a correction to the amended response.

If you have any questions concerning this matter, please contact the Quality Assurance Office at FTS 776-1418.

Sincerely,

Larry R. Hayes,
Chief, Branch of YMP

LRH/MMH

cc: J.R. Willmon, USGS, QA
J.J. Brogan, SAIC, Las Vegas, NV
R.W. Gray, MED, NV
A.D. Boyce, MED, NV
QA Logbook
QA File 3.16.01 YMPO SDR-151
USGS Local Records Center
R.R. Luckey

AMENDED RESPONSE TO SDR 162

August 1, 1989

BLOCK 14: Remedial/Investigative Action(s):

As given in original response and amended February 10, 1989.

BLOCK 15: Effective Date:

August 14, 1989

BLOCK 16: Cause of the Condition and Preventative Action to Prevent Recurrence

Replace Original response with:

"Based on guidance provided by DOE/YMPO, initial vendor qualifications will be conducted as described in Block 14 and QMP 7.01, R3 will be revised to state that requalifications will be accomplished through the audit process."