



## Department of Energy

Nevada Operations Office

P. O. Box 98518

Las Vegas, NV 89193-8518

OCT 05 1989

WBS #1.2.9.3

QA

Robert R. Loux, Jr.  
Executive Director  
Nuclear Waste Project Office  
State of Nevada  
Evergreen Center  
Suite 252  
1802 North Carson Street  
Carson City, NV 89710

### QUALITY ASSURANCE AUDIT OF U.S. GEOLOGICAL SURVEY

This letter is in response to your letter of August 29, 1989, concerning the alleged violations of YMP-88-01/QMP-18-01 and NQA-1, during the audit of the U.S. Geological Survey, conducted on August 14-18 and 21-22, 1989, in Denver, Colorado, and Las Vegas, Nevada.

Your allegations were:

- o The above audit was performed contrary to the requirements of the U.S. Department of Energy (DOE) 88-1/QMP-18-01 and violated NQA-1 requirements of "Sufficient Authority and Organizational Freedom" of the audit personnel.
- o The new position of Audit Manager was not described in procedure QMP-18-01 and negated the authority and organizational freedom of the Audit Team Leader (ATL) and Lead Auditor as defined in QMP-18-01 and NQA-1.
- o Mr. Blaylock acting as the Audit Manager and participating as an auditor, reporting to the ATL constituted a conflict of interest.
- o Mr. Blaylock is still listed as the Project Quality Manager for DOE/Yucca Mountain Project Office (Project Office) and he clearly should not have served on this audit in these two capacities.

Prior to the creation of the U.S. Department of Energy's (DOE) position of Audit Manager, the applicable controlling specifications/procedures were considered for any possible violations to either YMP-88-1/QMP-18-01 or NQA-1.

The purpose of the Audit Manager is to provide DOE representation and alleviate some of the extraneous functions of the ATL, e.g., having to serve as the interface between the project participant and observers. His function of addressing the opening and closing of the audit is perfunctory in nature and in no way can be misconstrued as to usurp the ATL's responsibility or

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Add: R. Browning

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authority. It is noted that the current audit process includes various activities, which are not described in the audit procedure, e.g., the U.S. Nuclear Regulatory Commission, State of Nevada, DOE/Headquarters, and others who send observers to the DOE Yucca Mountain Project audits. The audit procedure does not include activities which do not affect the audit process.

The ATL was clearly responsible for the execution of the audit in accordance with the applicable specifications/procedures. Subsequent discussion with the ATL relative to your alleged violations, revealed that there was no impact on the ATL's authority and organizational freedom to perform his assignment and he will attest to the same.

James Blaylock, functioning in both roles as the DOE Audit Manager and as an auditor, is not a conflict of interest. As previously stated, the role of Audit Manager is only to facilitate any needed interfaces between all participants during the audit and to address the group during the opening and closing meetings. It is common practice within the nuclear industry for a Quality Manager to function as an auditor of the audit team wherein the Quality Manager reports to the ATL who is responsible for conduct of the audit and who technically and administratively reports to the Quality Manager.

Although Mr. Blaylock may still be listed as Project Quality Manager in existing project documents, an organizational change was effective as of May 25, 1989, which temporarily detailed Mr. Edwin Wilmot as Acting Quality Assurance Director for the Project Office (enclosed). We are currently revising project documents to reflect this organizational change.

For reasons expressed above, there were no procedural violations of the audit process and, consequently, there is no need to revise any procedure or conduct another audit.

If you have any questions, please call Edwin L. Wilmot of my staff at (702) 794-7137.



Carl P. Gertz, Project Manager  
Yucca Mountain Project Office

YMP:NAV-5847

Enclosure:

Ltr dtd. 5/25/89 Gertz to Distribution

cc w/encl:

Dwight Shelor, HQ (RW-3) FORS

Robert Browning, NRC, Washington, DC 



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"QA: N/A"

**MAY 25 1989**

Distribution

DETAIL OF EDWIN L. WILMOT

I have temporarily detailed Ed Wilmot to Acting Quality Assurance Director for the Yucca Mountain Project Office while we advertise the position. The detail will become effective immediately.

A handwritten signature in cursive script, appearing to read "Carl P. Gertz".

Carl P. Gertz, Project Manager  
Yucca Mountain Project Office

YMP:CPG-4041

cc:  
N. J. Snyder, PSDO/REECO, Las Vegas, NV

**ENCLOSURE**