



Department of Energy

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

WBS #1.2.9.3
QA

OCT 03 1989

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) 154, REVISION 0, RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE (PROJECT OFFICE) QUALITY ASSURANCE AUDIT 88-04 OF U.S. GEOLOGICAL SURVEY (USGS)

SDR 154, Revision 0, has been closed based on the cited deficiencies and corrective actions being tracked by Project Office SDR 135 and USGS Corrective Action Report 88-01. A copy of the SDR is enclosed for your files.

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

Edwin L. Wilmot, Acting Director
Quality Assurance Division
Yucca Mountain Project Office

YMP:JB-108

Enclosure:
SDR 154, Revision 0

cc w/encl:

Ralph Stein, HQ (RW-30) FORS
Dwight Shelor, HQ (RW-3) FORS
J. R. Willmon, USGS, Denver, CO
J. J. Brogan, SAIC, Las Vegas, NV, 517/T-12
K. A. Hodges, SAIC, Las Vegas, NV, 517/T-06
D. A. Klimas, SAIC, Las Vegas, NV, 517/T-08
J. H. Nelson, SAIC, Las Vegas, NV, 517/T-04
S. W. Zimmerman, NWPO, Carson City, NV
J. E. Kennedy, NRC, Washington, DC

cc w/o encl:

A. L. Temple, SAIC, Las Vegas, NV, 517/T-38
K. G. Sommer, HQ (RW-3) FORS
Alan Flint, USGS, NTS
D. O. Porter, SAIC, Golden, CO
J. W. Gilray, NRC, Las Vegas, NV

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PDR WASTE
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PDC

FULL TEXT ASCII SCAN

ADD: JEKennedy

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NH03

WMPO STANDARD DEFICIENCY REPORT

N-QA-038
3/87

Completed by Originating QA Organization

1 Date June 23, 1988		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 2	
3 Discovered During Audit 88-04		3a Identified By R. Klemens	3b Branch Chief Concurrency Date N/A		4 SDR No. 154 Rev. _____
5 Organization USGS/Denver		6 Person(s) Contacted D. Moore, J. Barth, M. Mustard		7 Response Due Date is 20 Working Days from Date of Transmittal	
8 Requirement (Audit Checklist Reference, if Applicable) NNWSI-USGS-QMP-4.01, R1, PARA. 4.1.1: All procurement actions...require the requestor to include the QA Level and the Scientific Investigation Plan (SIP) No. on the USGS requisition form DI-1.					
9 Deficiency Contrary to requirements, there is no SIP No. or QA Level included in agreement #14-08-0001-A-0350, Dated 9/1/87, with the Univ. of Oregon. In addition, the contract was issued prior to the date that the SIP was submitted					
10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective (1) Review the requirements of QMP 4.01 to determine applicability of SIP number to the proposed procurement.					

11 QAE/Lead Auditor Date <i>Daniel Klemens 7-25-88</i>	12 Branch Manager Date <i>[Signature] 7/25/88</i>	13 Project Quality Mgr. Date <i>Jane 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. [Signature] 8/21/88</i> <i>[Signature] 8/31/88</i>	
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19 20 21	<input type="checkbox"/> Accept <input checked="" type="checkbox"/> Amended Response <input checked="" type="checkbox"/> Reject	QAE/Lead Auditor/Date <i>Dan Klemens 12-5-88</i>	Branch Manager/Date <i>[Signature] 5 Dec 88</i>
	<input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject	QAE/Lead Auditor/Date <i>Dan Klemens 5-11-89</i>	Branch Manager/Date <i>[Signature] 15 Dec 89</i>
	<input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory	QAE/Lead Auditor/Date <i>Dan Klemens 8/24/89</i>	Branch Manager/Date <i>J.W. Estelle 8/30/89</i>

22 Remarks <i>Corrective Action for this SDR will be SDR #135 of Audit 88-03 and USGS CAR 88-01.</i>			
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23 QA CLOSURE	QAE/Lead Auditor/Date <i>Dan Klemens 8/24/89</i>	Branch Manager/Date <i>J.W. Estelle 8/30/89</i>	PQM/Date <i>Jane Blaylock 9/17/89</i>
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ENCLOSURE



WPMO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

N-QA-038
10/86

SDR No. 154

Rev.

Page 2 of 2

9 Deficiency (continued)

to DOE for approval. Similar deficiencies were reported by USGS on several occasions; reference finding USGS-8701-6, NCR-88-09, NCR-88-12 and CAR-88-01, but to date, there has been no effective corrective action by USGS (Ref. page 2 of USGS CAR-88-01).

In addition, contract #GS-095-50007 from GSA to Martin Marietta, was piggy-backed by PO #061311-86 dated 9/5/88, from USGS to GSA. The purchase requisition for this PO and subsequent 5 modifications have not identified SIP No. or QA Level as required. The task order HF6603, which is part of this P.O., states that the function of the Instrumentation/Data-Acquisition System (IDAS) must be considered a QA Level I activity. Modification 4 to the P.O. contained a Technical Review Sheet which indicated that the Quality Level was "N/A", which is contrary to the task order HF 6603 instructions, and to the Quality Level Assignment Sheets which are attached to SIP #3343.

Discussion: This SDR was written because of the deficiencies found during the review of procurement documents which indicated that the requirements of NNWSI-USGS/QMP-4.01, Rev. 1, were not being met. USGS-CAR-88-01, dated 6/7/88, referenced 3 previous audits and surveillances with similar deficiencies and reported that procurement deficiencies in the referenced documents have not been resolved to date. Deficiencies which have been previously reported by the audited organizations are usually written as observations on WPMO audits, but because USGS had not resolved the deficiencies in a reasonable length of time, a decision was made to use the standard deficiency report. The SDR provides a means for WPMO to follow and verify the necessary corrective action as well as getting the attention of upper management.

10 Recommended Actions (continued)

- (2) Investigate to determine the extent of the noncompliance and impact on quality.
- (3) Reinstruct applicable personnel as to the procedure requirements.

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

See USGS-CAR-88-01.

BLOCK 15: EFFECTIVE DATE: See USGS-CAR-88-01.

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

See USGS-CAR-88-01.

BLOCK 17: EFFECTIVE DATE: See USGS-CAR-88-01.

CORRECTIVE ACTION REPORT

IDENTIFICATION OF CORRECTIVE NEED

Source: 1. NCR#: See page 2 2. Audit #: See page 2 3. Other: See page 2

4. Description: A significant problem exists involving the implementation of procurement document control and related requirements. Recurring deficiencies
(Briefly describe cause of item or event requiring corrective action)

have been identified in several deficiency-type documents. This condition is further described on page 2.

5. Ardell M. Whiteside 6-7-88 6. De Wellmon 6-7-88
Originator Ardell M. Whiteside Date 6-7-88 QA Approval Date
See update on page 2 QW 7-13-88

CORRECTIVE ACTION

7. Proposed corrective action: See Attached Interim Response

8. Larry R. Hunt 8/31/88
Principal Investigator or Responsible Actionee Date

9. Corrective action statement: _____

10. Review Board Approval:

Project-Coordinator- Date QA Manager Date Other Date
NNWSI-USGS TPO
Implementation: 11. Completed Date

VERIFICATION OF CORRECTIVE ACTION

12. Verification-QA Approval Date 13. Final QA Approval Date

14. Comments: _____

15. Distribution: DOE/WMPO Chief, Branch of NNWSI
OASC USGS QA Office

IDENTIFICATION OF CORRECTIVE NEED

Source: Audit: USGS-87-01, AFR 06
WMPO Audit 87-6/87-7, Obs.3
USGS-87-01, Observation 4.

NCR: USGS-88-09
USGS-88-12

Other: ^{aw 6/21/88} ^{GRW 6/21/88} Surveillance USGS-87 S04, Obs. 4

NOTE: Additional WMPO Audit 88-3 Deficiencies were identified in May 1988 in Menlo Park
Reference: WMPO SDR-135, SDR-136, and SDR-138
The USGS responses to these items are due to WMPO by 6/26/88, therefore the cause of each SDR deficiency is not known at this time.

Also REFER TO SDR 154. aw 6-1-88 GRW 6/19/88

Description: The procurement deficiencies identified in Audit Finding Report USGS-8701-06 have not been resolved to date. Additional procurement related deficiencies and potential problems have been identified in the documents listed above. The scope of the deficiencies involve the following USGS QA procedures:

- NNWSI-USGS-QMP-4.01, R1, Procurement Document Control
- NNWSI-USGS-QMP-7.01, RO, Supplier Evaluation, Selection and Control
- NNWSI-USGS-QMP-7.02, RO, Receiving Inspection
- NNWSI-USGS-QMP-7.03, RO, Acceptance of Materials, Equipment and Services

The corrective actions have not been completed nor have the actions effectively resolved the deficiencies initially identified in the AFR-USGS-8701-06. The actions required a QA review of procurement documents to determine impact, revision of governing QMPs, and direction to project personnel to assure appropriate review and approval of procurement documents. Other areas of the procurement requirements relating to QA records, distribution of QA Level I and II procurement documents to WMPO, QA review of all QA Level I and II contracts and purchase orders, etc., also have not been resolved to date. The WMPO Audit 88-3 conducted in May 1988 in the USGS - Menlo Park facility indicates that this type of deficiency exists in the Menlo Park office as well as in the Denver area offices as evidenced by WMPO SDRs 135, 136, and 138.*

The USGS implementing procedures must be prepared to comply with the NNWSI-USGS Quality Assurance Program Plan and the WMPO Quality Assurance Plan. A management approach and plan to resolve the procurement processing and related deficiencies should be developed as soon as possible. This management plan should involve a review of prior procurements to determine the impact on quality and whether or not extensive remedial actions are warranted.

*aw
-13-88
GRW 7/14/88*

* Based upon USGS responses to the WMPO SDRs:

SDR 135: USGS acknowledged procurement processing deficiencies in Menlo Park. Actions to resolve this CAR should include consideration of NNWSI-USGS locations, and emphasis upon appropriate management attention.

SDR 136: USGS acknowledged ambiguities between QMP-7.01 and 7.03. Procedures to be revised.

SDR 138: USGS did not agree deficiency was presented. No

USGS-CAR-88-01
INTERIM RESPONSE

A Corrective Action Board is being established to determine a more workable procurement administration process. Based on the Board's recommendations a management plan will be developed to:

1. Make the administrative changes necessary to implement the new procurement process.
2. Revise QMPs 4,01, 7.01, 7.02 and 7.03 to reflect administrative and QAPP changes.
3. Evaluate impact of changes in plans/procedures on any procurements processed prior to the new version of QMP-4.01. If remedial actions are warranted, develop a program and schedule for completing the actions.

The recommendation of the CAR Board will form the response to item 7 Proposed Corrective Action.



IN REPLY REFER TO:

United States Department of the Interior

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



154

August 31, 1988

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

SUBJECT: USGS responses to 20 SDRs from WMPO Audit 88-4

Dear Carl:

Enclosed are the USGS responses to the twenty WMPO Audit 88-4 SDRs. The conduct of the audit and its results have drawn a great deal of public scrutiny. Because of this visibility and the USGS's concern regarding the findings from this audit, I asked the Quality Assurance Manager and his staff to undertake an investigation and evaluation of each of the SDRs. The results of the investigation of the SDRs indicate that, although improvements need to be made with the NNWSI-USGS QA program, none of the deficiencies represent a significant quality program breakdown. Of the twenty SDRs our analysis indicates that sixteen represent deficiencies of varying significance.

The USGS will work to correct these deficiencies just as it has corrected those identified in the past. The USGS has put a substantive effort in implementing its QA program and will continue this effort until you and NRC indicate full acceptance of the USGS Quality Assurance program.

In closing, I must express my concern about the atmosphere under which the audit process was conducted. The types of pressures that can be associated with these conditions can lead

SAIC/T&MSS

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CCF RECEIVED

to situations where objectivity and logic can be distorted. Audit 88-4 has caused a number of repercussions throughout both our organizations. I feel confident, however, that we can now work together to build a technically sound and quality assured site characterization program.

Sincerely,



Larry R. Hayes, Chief,
Branch of NNWSI

THC/LRH/aa

Enclosures

cc w/enclos.: J. F. Devine, USGS, Reston, VA
V. Schneider, USGS, Reston, VA
E. H. Roseboom, USGS, Reston, VA
J. R. Willmon, USGS, Denver, CO
R. B. Raup, USGS, Denver, CO
D. G. Jorgensen, USGS, Denver, CO
J. Blaylock, DOE/WMPO, Las Vegas, NV
S. H. Klein, SAIC, Las Vegas, NV
D. D. Porter, SAIC, Golden, CO
USGS/RC/1293/1/QA File 3.18.01 (88-4) WMPO Audit

AMENDED RESPONSE TO SDR-154
February 10, 1989

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

As given in original response.

BLOCK 15: EFFECTIVE DATE:

Review of prior procurements as required by response to USGS-CAR-88-01 - expected completion date is April 1988.

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

As given in original response.

BLOCK 17: EFFECTIVE DATE:

Response to CAR fully approved by CAR Review Board - completed January 13, 1989

Administrative changes - April 1989

Training - March 1989

QMP revisions - effective date of QMP-4.01 to coincide with administrative changes and training. QMP-7.01 revised November 4, 1988 to supersede QMPs -7.01, -7.02, and 7.03.

AMENDED RESPONSE TO SDR-143, -144, -145, -146,
-147, -148, -155, -156, and -157
February 10, 1989

BLOCK 14: REMEDIAL/INVESTIGATIVE ACTION(S):

Part of the "fully qualified QA program" described in block 16 will be the establishment of a qualification process for data that is intended for use in the Project Office licensing process and that had been developed by the USGS before the implementation of this "fully qualified QA Program". This process will be consistent with the Project Office AP-5.9Q.

BLOCK 15: EFFECTIVE DATE:

Thirty days subsequent to issuance of AP-5.9Q.

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

The USGS is currently in the process of establishing a Quality Assurance Program which meets the requirements of NNWSI/88-9, Rev.2. The establishment, implementation, and verification of this "fully qualified QA Program" will provide the corrective action to prevent recurrence for the SDRs.

BLOCK 17: EFFECTIVE DATE:

Progress on the "fully qualified QA Program" is tracked for the Project Office bi-weekly and reported as part of the Gold Star Schedule. Please refer to this schedule for current dates. A specific date cannot be accurately projected at this time because parts of the USGS QA Program are dependent upon Project Office APs.

YMPO verification of the USGS Program is scheduled by the Project Office.