



**AGENCY FOR NUCLEAR PROJECTS  
NUCLEAR WASTE PROJECT OFFICE**

Capitol Complex  
Carson City, Nevada 89710  
(702) 885-3744

August 29, 1989

Mr. Carl Gertz, Project Manager  
Yucca Mountain Project Office  
U.S. Department of Energy  
Nevada Operations Office  
P.O. Box 98518  
Las Vegas, Nevada 89193

Dear Mr. Gertz:

The DOE/YMP quality assurance audit of the U.S. Geological Survey held on August 14-18, 21-23, 1989 was performed contrary to the requirements of the DOE 88-1/QMP-18-01 and violated the NQA-1 requirements for "sufficient authority and organizational freedom" for audit personnel (Supplement 18S-1).

The new position of Audit Manager (see attached) is not included in procedure QMP-18-01. The duties and responsibilities of the Audit Manager as indicated in the attachment clearly negate the authority and organizational freedom of the Audit Team Leader/Lead Auditor as defined in QMP-18-01 and NQA-1.

The presence of Jim Blaylock on this audit as both the designated Audit Manager and as an auditor who answers to the Lead Auditor was a clear conflict of interest. Also, Mr. Blaylock is still listed as the Project Quality Manager for DOE/YMP and he clearly should not have served on this audit in these two capacities.

Given the procedural violations and the obvious conflict of interest, we believe Audit 89-4 of the USGS to be invalid and that an independent audit should be performed in accordance with approved plans and appropriate Quality Assurance standards.

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Please keep me informed of how you intend to proceed regarding this matter. I hope to hear from you soon.

Sincerely,



Robert R. Loux  
Executive Director

Attachment

cc: Dwight Shelor  
Director, QA  
OCRWM  
Washington, D.C.

\ Robert Browning  
Division of High-Level Waste Management  
U.S. NRC  
Washington, D.C.

Ed Wilmot  
Director, QA  
DOE/YMP  
Las Vegas, Nevada



# Department of Energy

Nevada Operations Office

P. O. Box 98518

Las Vegas, NV 89193-8518

WBS #1.2.9

"QA"

AUG 08 1989

QA RECEIVED

AUG 10 1989

Leslie J. Jardine, LLNL, Livermore, CA  
Larry R. Hayes, USGS, Las Vegas, NV  
Richard J. Herbst, LANL, Los Alamos, NM  
Thomas O. Hunter, SNL, 6310, Albuquerque, NM  
John H. Nelson, SAIC, Las Vegas, NV  
Joseph C. Calovini, H&N, Las Vegas, NV  
Robert F. Pritchett, REECO, Las Vegas, NV  
Richard L. Bullock, FSN, Las Vegas, NV  
Addanki M. Sastry, MACTEC, Las Vegas, NV

## YUCCA MOUNTAIN PROJECT OFFICE (PROJECT OFFICE) AUDITS OF PARTICIPANTS

The Project Office will identify a U.S. Department of Energy lead for all participant audits. This individual will be designated as the Audit Manager and will be responsible for serving as the interface between the audit participants, conducting the opening and closing audit meeting, and facilitating the other auxiliary meetings. As such, the individual does not have to be a qualified Lead Auditor, since the planning and execution of the audit will continue to be the responsibility of the Audit Team Leader and Lead Technical Specialist. This position will be established effective with the U.S. Geological Survey audit scheduled for August 14, 1989.

If you have any questions regarding this matter, please contact James Blaylock of my staff at (702) 794-7913 or FTS 544-7913.

YMP:JB-5298

### CC:

Dwight Shelor, HQ (RW-3) FORS  
K. G. Sommer, HQ (RW-3) FORS  
J. R. Willmon, USGS, Denver, CO  
R. R. Richards, SNL, 6310, Albuquerque, NM  
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G. P. Fehr, SAIC, Las Vegas, NV

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

*Violates QAP 18-01 Para 5.3.1*  
*NPA-1, Supp 25-3, Para. 1*  
*what are requirements (communication) to be a Audit manager?*