



Department of Energy

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

WBS #1.2.9.3
"QA"

AUG 30 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

ACCEPTANCE OF AMENDED RESPONSE TO STANDARD DEFICIENCY REPORT (SDR) 135,
REVISION 0, RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE (PROJECT OFFICE)
QUALITY ASSURANCE (QA) AUDIT 88-03 OF U.S. GEOLOGICAL SURVEY (USGS)

The Project Office QA staff has evaluated and accepted your amended response to SDR 135, generated as a result of Project Office QA Audit 88-03 of USGS. The SDR will be closed after verification of satisfactory completion of the specified corrective actions. A copy of the SDR is enclosed for your information.

Verification of completion of your corrective action will be performed after the effective dates that were provided. Any extension to these due dates must be requested in writing with appropriate justification prior to the due date. Please send copies of the extension request to Juanita Brogan, Science Applications International Corporation, 101 Convention Center Drive, Las Vegas, Nevada 89109, and Ralph Gray, U.S. Department of Energy, P. O. Box 98518, Las Vegas, Nevada 89193.

If you have any questions, please contact James Blaylock of my staff at 794-7913, or Catherine M. Thompson of Science Applications International Corporation at 794-7738.


Catherine M. Thompson for
Edwin L. Wilmot, Acting Director
Quality Assurance Division
Yucca Mountain Project Office

YMP:JB-5609

Enclosure:
SDR 135

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WMPO STANDARD DEFICIENCY REPORT

N-QA-C38
3/87

Completed by Originating QA Organization 8/23/89

1 Date 4/28/88		2 Severity Level <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3		Page 1 of 3	
3 Discovered During Audit No. 88-3		3a Identified By F. J. Ruth		3b Branch Chief Concurrency Date N/A	
5 Organization USGS-Menlo Park		6 Person(s) Contacted Karen Vorganstern		7 Response Due Date is 20 Working Days from Date of Transmittal	
8 Requirement (Audit Checklist Reference, if Applicable) (Refer to Audit checklist Item No. 4.3-4.6 and 4.11-4.17) A. NNWSI-USGS-QAPP, R.4, Section 4, Procurement Document Control, Paragraph 4.2, states in part, "The USGS shall prepare work agreements,					
9 Deficiency A. There was no objective evidence that a work agreement, memorandum of understanding, or an interagency agreement existed for Requisition No. 9380-1053, Vendor, Ben Schulein.					
10 Recommended Action(s): <input checked="" type="checkbox"/> Remedial <input checked="" type="checkbox"/> Investigative <input checked="" type="checkbox"/> Corrective 1. Take actions to correct the specific deficiencies noted on the SDR. 2. Determine if there are any other procurement documents with the					
11 QAE/Lead Auditor Date <i>[Signature]</i> 5/1/88		12 Branch Manager Date <i>[Signature]</i> 5/18/88		13 Project Quality Mgr. Date <i>[Signature]</i> 5/23/88	
14 Remedial/Investigative Action(s) A Corrective Action Report (CAR) was issued on 6-7-88 due to recurring deficiencies in the procurement process. This CAR will be revised to place greater emphasis on procurement problems that have occurred at USGS field offices. Greater emphasis will also be placed on the need for more active involvement by upper- (see page 3)					
15 Effective Date <u>7-15-88</u>					
16 Cause of the Condition & Corrective Action to Prevent Recurrence The cause and the corrective action to prevent recurrence for these deficiencies will be determined by the response to the internal CAR (USGS-CAR-88-01)					
17 Effective Date <u>N/A</u>					
18 Signature/Date <i>[Signature]</i> 7/1/88					
19 Response <input type="checkbox"/> Accept <input checked="" type="checkbox"/> Amended Response		QAE/Lead Auditor/Date <i>[Signature]</i> 4/20/89		Branch Manager/Date <i>[Signature]</i> 2089/89	
20 Amended Response <input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject		QAE/Lead Auditor/Date <i>[Signature]</i> 7/23/89		Branch Manager/Date <i>[Signature]</i> F-21-89	
21 Verification <input type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory		QAE/Lead Auditor/Date		Branch Manager/Date	
22 Remarks					
23 QA CLOSURE		QAE/Lead Auditor/Date		Branch Manager/Date	
PQM/Date					



WMPO STANDARD DEFICIENCY REPORT
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8 Requirement (continued)

memorandums of understanding, interagency agreements, management agreements, or other suitable documents."

B. NNWSI-USGS-QMP-4.01, R.1, Paragraph 4.1.1, requires the requestor to include the QA Level and the Scientific Investigation Plan (SIP) No. on the USGS Requisition.

C. Paragraph 4.1.3 requires that requisition documents include or reference applicable regulatory requirements, site investigation basis and other requirements that are necessary to assure adequate quality for the procurement of the material, equipment, or services utilized on the NNWSI Project.

D. Paragraph 4.1.4 requires that Level I items/services, requisition documents include provisions from the following Paragraphs, 4.1.4.1 through 4.1.4.5.

E. Paragraph 4.3.1 requires the requestor/PI to complete the USGS Requisition Form D1-1, Attachment 1, and the NNWSI Technical Review of Procurement Documents form, Attachment 2.

F. Paragraph 4.3.2 requires the NNWSI Branch Administrative Officer to assign a controlled requisition number to both Attachments 1 and 2 and to obtain the approval signature of the Chief, Branch of NNWSI.

G. Paragraph 4.3.3, requires the QA Manager to review the requisition in accordance with Attachment 3 Checklist for USGS Procurement Document QA Review. Upon satisfactory completion of the review, the QA Manager is to sign Attachment 3.

H. Paragraph 4.3.5 requires the USGS QA Manager to review all Level I and II contracts and purchase orders for QA compliance with the approved requisition prior to their release and to send copies of all Level I procurement documents and any subsequent changes to DOE/WMPO.

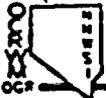
I. NNWSI-USGS-QAPP, R.4, Section 4, Paragraph 4.6, requires the USGS to forward to the WMPO QA (QASC-Audits and Surveillance Branch Manager) one copy of purchase documents, and changes thereto, as issued, when purchases involve QA Level I items or services.

9 Deficiency (continued)

B. There was no QA Level or SIP numbers identified on Requisition Nos. 9380-1017, 9380-1018, and 9380-1053

C. Requisition No. 9380-1053 was determined to be a QA Level I activity. No reference has been made to the applicable regulatory requirements, site investigation basis and any other requirements that are necessary to assure adequate quality for

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WMPO STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

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9 Deficiency (continued)

the procurement.

D. Requisition No. 9380-1053, which has been identified as a QA Level I does not have any of the applicable provisions identified in Paragraph 4.1.4.1 through 4.1.4.5, Scope of Work Technical requirements, QA Requirements, Rights of Access, and Documentation requirements.

E. NNWSI Technical Review of Procurement Documents, Attachment 2 has not been prepared as required for Requisition No. 9380-1053.

F. The three (3) requisitions (Nos. 9380-1017, 9380-1018, and 9380-1053) that were reviewed during the course of the audit did not have the approval signature of the Chief, NNWSI.

G. Attachment 3 checklist for USGS Procurement Document QA Review has not been prepared for Requisition No. 9380-1053.

H. There is no evidence that the USGS QA Manager has reviewed Requisition No. 9380-1053 for QA compliance with the approved requisition prior to release. There is also no objective that copies of Level I procurement documents or any subsequent changes were sent to DOE/WMPO by the USGS QA office as required.

I. There is no objective evidence the USGS has forwarded to the WMPO QA (QASC-Audits and Surveillance Branch Manager) a copy of purchase documents and changes thereto, as issued, when purchases involve QA Level I items or services. An example is Requisition No. 9380-1053, which has been determined to be for a QA Level I activity.

10 Recommended Actions (continued)

identical and/or similiar deficiencies noted in this SDR.

3. Identify the actions to be taken to identify the cause of the conditions and what will be done to prevent recurrence.
4. Determine the impact of this deficiency on the quality of any work performed.

14. Remedial/Investigative Action(s) (continued)

level management in the development of either a Project Plan or individual unit procedures delineating the procurement process.

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United States Department of the Interior



GEOLOGICAL SURVEY
BOX 25046 M.S. 425
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

WBS #: 1.2.9.3
QA: "QA"
June 23, 1989

IN REPLY REFER TO:

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

ATTENTION: E. L. Willmot, Acting Project Quality Manager

SUBJECT: AMENDED RESPONSE TO STANDARD DEFICIENCY REPORT (SDR) 135

REFERENCE: James Blaylock letter to Larry R. Hayes, dated May 23, 1989, subject: YMPO Project Office Evaluation of the Response to SDR 135, and USGS CAR-88-01

Dear Carl:

An amended response to the subject SDR is enclosed which addresses item 6 of the referenced correspondence. The USGS has a concern with items 1 through 5 as explained below. A review of our notes from the March 21, 1989 meeting between USGS personnel and DOE Project Office on the acceptability of the response, indicates the referenced correspondence is not in agreement with the agreements made at that meeting.

Item 1: The USGS does not see the wisdom of correcting each specific deficiency identified within each of the CAR source deficiency documents. A justification for this decision was contained in the CAR response and is repeated here for emphasis.

"The Quality Assurance Office will review the current service contracts providing QA level I or II support to the Yucca Mountain Project to determine QA adequacy of the contractual provisions. This action is comprehensive enough to include all procurement transactions for which a modification to an existing contract may be used as a remedial action for inadequate contractual provisions. Completed procurement transactions (both service and items) are specifically excluded. The ultimate purpose of the QA controls on procurements is to assure that proper provisions are included in QA level I and II procurements to assure that the item or service meets the needs of the Yucca Mountain Project. Whether all applicable provisions were included in a procurement or not is immaterial after the procurement is complete; the procurement process cannot be used as a positive instrument to correct deficiencies in these prior procurements. The adequacy of the item or service itself,

rather than the adequacy of the procurement documents is the relevant point. Use of these purchased items and services are subject to other controls of the QA Program (calibration, special handling, scientific and engineering software, nonconformance reports, scientific investigation close-out, records review, technical reviews, surveillances and audits)."

Furthermore, the Project Office current position is that all work to date is subject to AP-5.9Q for qualification before it can be used to directly support licensing. This Project-level position further supports the USGS decision not to retro-fit all deficient procurement documents but only those that are still pertinent.

Item 2: The USGS has performed a detailed analysis of the deficiencies and identified the root causes of the procurement deficiencies. These root causes were identified as: lack of awareness of the procedures, infrequent use of the procedures, inadequate training, and inadequate control over the Administrative Division. A decentralized organization was not one of the identified root causes. The Project Office has provided no evidence for its "feelings" that decentralized organization was the root cause.

However, regardless of whether it was a root cause, the corrective action commitments within the CAR response (pp. 2-3, Administrative Changes, I. Administrative Office and II. Procurement Unit of the Administrative Division) already address the description requested in the amended response. The Administrative Offices are limited to one per division and the personnel of the Procurement Unit of the Administrative Division are limited to those who are trained in the procedures and have their position descriptions revised to include YMP duties.

The reference to the Bureau of Reclamation in this context was inappropriate. The Bureau of Reclamation is not a division of the USGS but rather operates at a sub-tier level to the USGS with their own USGS-approved Quality Assurance Program.

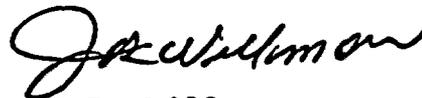
Item 3: This item is substantially the same as item 1. Also there appears to be a typographical error in the fourth sentence. It is assumed that "open" should be replaced by "closed" in order to make the sentence coherent. The USGS is committed to reviewing all open QA level I and II contracts. This is the remedial action that the USGS considers warranted. Again, using the logic explained under item 1, no further action is warranted concerning closed procurement documents.

Additionally, it is deemed unnecessary to initiate individual nonconformance reports on each specific deficiency. The CAR is an upper-level QA deficiency document. If the corrective action commitments for a CAR are sufficiently comprehensive to include the appropriate remedial actions for the source deficiency documents, then the NCRs become redundant. There is no reason to initiate an NCR when the appropriate remedial action commitment already exists.

Item 4: The CAR response stated "The Quality Assurance Manager shall be involved in bid evaluations, solicitations, and changes to procurement documents, as applicable,". This was stated in this manner because the responsibilities for these actions lie directly with the Quality Assurance Manager. No other position has been set up by title to fulfill these duties, however the Quality Assurance Manager can delegate the authority to fulfill his duties to his staff members, as appropriate. The QA Manager's ability to manage the QA Program is not an issue relevant to the response to this SDR.

Item 5: The root cause of the violation of the approved vendor's list was identified by the CAR response as lack of proper procurement document processing. The statement that it was not identified was made within the "analysis of deficiencies" section of the response and must be taken in context. It referred to previous identification already made within the source deficiency documents.

Sincerely,



J.R. Willmon,
Quality Assurance Manager
Yucca Mountain Project

MHM/JRW/aa
Enclosure

cc:

L. R. Hayes, USGS, Denver, Atten: M. Simpson
J. W. Estella, SAIC/T&MSS Project QA Engineering
R. W. Gray, IMD, NV
S. Berkel, IMD, NV
J. J. Brogan
USGS LRC
QA File 3.16.01 USGS-CAR-88-01
QA logbook

AMENDED RESPONSE TO SDR-135

NNWSI-USGS-QMP-4.01 and YMP-USGS-QMP-7.01 have been revised to address the requirements stated within item 6 of the amendment request letter. These revised procedures have already been reviewed and approved. The effective dates are June 23, 1989.

AUG 30 1989

Larry R. Hayes

-2-

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
L. G. Scherr, SAIC, Las Vegas, NV, 517/T-06
A. L. Temple, SAIC, Las Vegas, NV, 517/T-38
C. M. Thompson, SAIC, Las Vegas, NV, 517/T-12
S. W. Zimmerman, NWPO, Carson City, NV
J. E. Kennedy, NRC, Washington, DC 

cc w/o encl:

K. G. Sommer, HQ (RW-3) FORS
Alan Flint, USGS, NIS
G. P. Fehr, SAIC, Las Vegas, NV, 517/T-12
V. D. Hedges, SAIC, Las Vegas, NV, 517/T-06
R. J. Bahorich, W, Las Vegas, NV, 517/T-12
D. O. Porter, SAIC, Golden, CO
J. W. Gilray, NRC, Las Vegas, NV