



Department of Energy

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

WBS #1.2.9.3
"QA"

AUG 31 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) 162,
REVISION 0, RESULTING FROM YUCCA MOUNTAIN PROJECT OFFICE (PROJECT OFFICE)
QUALITY ASSURANCE (QA) AUDIT 88-4 OF U.S. GEOLOGICAL SURVEY (USGS)

The Project Office QA staff has evaluated and accepted your amended response to SDR 162, Revision 0, generated as a result of Project Office QA Audit 88-4 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 (SAIC), 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 Daniel A. Klimas of SAIC at 794-7881.

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

YMP:JB-5551

Enclosure:
SDR 162, Revision 0

8909080110 890831
PDR WASTE PDC
WM-11

WM-11
NH03
102.7

7

WMPO STANDARD DEFICIENCY REPORT

N-GA-C3E
3/87

Completed by Originating QA Organization

Aprvl.

Completed by Organization in Block 5

Comp. by Orig. QA Org.

1 Date June 15, 1988

2 Severity Level ☐ 1 ☒ 2 ☐ 3

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3 Discovered During
WMPO-Audit 88-43a Identified By
W. B. Mansel3b Branch Chief
Concurrence Date4 SDR No.
162

Rev. 0

5 Organization
USGS-Denver6 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): ☒ Remedial ☒ Investigative ☒ Corrective

1. Perform an audit of all USGS contactors on the approved vendors list.

11 QAE/Lead Auditor Date

12 Branch Manager

Date

13 Project Quality Mgr. Date

Daniel Klumpp 7-25-88

A. M. Whiteside 7-25-88

James Blaylock 7/25/88

14 Remedial/Investigative Action(s)

15 Effective Date

See attached response for Blocks 14-17.

16 Cause of the Condition & Corrective Action to Prevent Recurrence

17 Effective Date

18 Signature/Date

James R. Klumpp

8/31/88

J. R. Willmon 8/31/88

19 Response

☐ Accept
☐ Reject☒ Amended
Response

QAE/Lead Auditor/Date

Branch Manager/Date

Dan Klumpp 12-5-88

A. M. Whiteside 12-5-88

20 Amended
Response☒ Accept
☐ Reject

QAE/Lead Auditor/Date

Branch Manager/Date

Dan Klumpp 5-11-89

A. M. Whiteside 19 May 89

21 Verifi-
cation☐ Satisfactory
☐ Unsatisfactory

QAE/Lead Auditor/Date

Branch Manager/Date

22 Remarks

23
QA CLOSURE

QAE/Lead Auditor/Date

Branch Manager/Date

PQM/Date



W. O STANDARD DEFICIENCY REPORT
CONTINUATION SHEET

N-QA-038
10/86

SDR No. 162

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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

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:

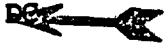
"Based on guidance provided by DOE/YMPO, initial vendor qualifications will be conducted as described in Block 14 and QMP 7.01, R3 will be revised to state that requalifications will be accomplished through the audit process."

Larry R. Hayes

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AUG 31 1989

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
D. A. Klimas, SAIC, Las Vegas, NV, 517/T-08
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, NTS
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