

Department of Energy

Office of Civilian Radioactive Waste Management Yucca Mountain Site Characterization Office P.O. Box 98608 Las Vegas, NV 89193-8608

MAY 0 3 1996

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U.S...Geological Survey
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EVALUATION OF RESPONSE TO DEFICIENCY REPORT (DR) YMQAD-96-D035 RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) SUPPLIER AUDIT OQA-SA-96-009 OF CAMPBELL SCIENTIFIC, INC. (SCPB: N/A)

The Yucca Mountain Quality Assurance Division staff has evaluated the response to DR YMQAD-96-D035. The response has been determined to be satisfactory. Verification of completion of the corrective action will be performed after the effective date provided. Any extension to this date must be requested in writing, with appropriate justification, prior to the date. Please send a copy of extension requests to Deborah Sult, YMQAD/QATSS, 101 Convention Center Drive, Suite 640, Las Vegas, Nevada 89109.

If you have any questions, please contact either Robert B. Constable at 794-5580 or Richard L. Maudlin at 794-1302.

Richard E. Spence, Director Yucca Mountain Quality Assurance Division

YMQAD:RBC-1651

Enclosure: DR YMQAD-96-D035

cc w/encl:

J. G. Spraul, NRC, Washington, DC

S. W. Zimmerman, NWPO, Carson City, NV

T. H. Chaney, USGS, Denver, CO

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV

R. L. Maudlin, YMQAD/QATSS, Las Vegas, NV

D. G. Sult, YMQAD/QATSS, Las Vegas, NV

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⁸ □Performance Report ⊠Deficiency Report
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	•	QA: L İ
FORMANCE/DEFICIENCY REPORT		

PERFORMANCI	E/DEFICIENCY REPORT		
1 Controlling Document.		.2 Related Report No.	
OCRWM QARD. Rev. 5 / USGS PO 1434-CR-SA-0 QA Manual, Rev. 01	00200 / Camppell Scientific, Inc.	OQA-SA-96-009	
3 Responsible Organization:	4 Discussed With:		
Campbell Scientific, inc. / USGS P. Campbell / C. Howeil / T. Chaney			

5 Requirement/Measurement Criteria

QARD, Section 5.0. Subsection 5.2, states: "Work snall be performed in accordance with controlled implementing documents."

USGS PO. Quality Assurance Requirements for Supplier of Calibration Services, states in part: "...Procedures-...and include methods used for ensuring only the latest revision of the procedure is used."

Campbell Scientific, Inc. QA Manual. Subsection 4.2.1, states in part: "...The QA Manager shall be responsible for preparation of a documented quality system, procedures, and instructions...

6 Description of Condition

Contrary to the above, implementing procedures which implement the Campbell Scientific, Inc. QA Manual are not complete and have not been issued for implementation by Campbell Scientific, Inc. personnel. Subsequently, requirements as stated in the Campbell Scientific, Inc. QA Manual have not been implemented. Examples are as follows:

- 1. No evidence of management reviews of internal quality audits at least annually.
- 2. The implementing procedure for audits is only in craft. No implementing procedure for Measuring and Test Equipment.
- 3. No documented evidence of qualification indocumnation and training of personnel.
- 4. No records exist to demonstrate subclier qualification, vendor performance, and reliability for Stabro, who was used to calibrate standards used in USGS calibrations

7 Initiator July and		i Ca Review	
Richard L. Maudiin	Date 2/1/96	DAR TIP and.	Date ==
10 Response due Date		CA Issuance Approvail	
20 Working Davs From Iss	suance	CAR (PRI/ACQAM TORE) MODULE	Date 1 0
4			

SEE ATTACHED SHEET

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	DEFICIENC	Y REPORT	
17 Recommended Actions:	se and implement proce	edures which support the Campbell S	cientific inc. OA Manual
Evaluate each example identi Implement corrective action to Investigate and document the	fied against all work pe o resolve each of the ex cause of the condition	riormed for USGS and determine imp kamples noted.	pact on quality.
18 Investigative Actions:			
	SEE ATTACHED S	SREET	•
	<u> </u>		•
19 Root Cause Determination.			
	NOT APPLIC	ABLE	
٠.			
20 Action to Preclude Recurrence.			
	SEE ATTACHEI	D SHEET	
		·	
21 Response by		. 12 Corrective Action Completion Due Date	
Bruethehe	Date 4/19/96	NOT APPLICABLE	
QAR Mandli	Date 4/22/96	1 ADDAM RB Constable	Date 5.2.96
25 Amended Response Accepted QAR	Date	26 Amended Response Accepted AOQAM	Date

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PERFORMANCE/DEFICIENCY REPORT

Block 6 DESCRIPTION OF CONDITION (commuea)

- Wayne 723T PRT was fisted on USGS Certificates of Calibration as a Standard used to calibrate two dataloggers.
 First, the senal number of standard was erroneous and second, no occumented evidence exists to indicate 723T PRT was calibrated to standards traceable to NIST.
- 6. A deficiency report was generated to occument a deficiency in procurement, but unable to find deficiency report.
- 7. Handwritten calibration data filed to support USGS calibrations is not being stored in a 1-nour fire rated facility or container to prevent destruction by fire.
- 8. Audits of all levels of the quality system within each year have not been performed.

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PR/DR CONTINUATION PAGE

Remedial Actions: Block 12

Campbell Scientific, Inc is in the process of developing a new documented quality assurance system. The new system will include implementing procedures for annual internal audits as well as implementing procedures for M&TE. Campbell estimates that preparation, training, and implementation will be completed in August 1996.

Corrective actions will be evaluated upon implementation of the new Campbell quality system.

Investigative Actions: Block 18

<u>Condition 1:</u> Annual evaluations and triennial audits performed by USGS have consistently found the work performed by Campbell to be technical adequate.

Condition 2: The lack of procedures for internal audits is a programmatic issue which has not adversely affected USGS calibrations.

<u>Condition 3:</u> Direct surveillance of personnel performing calibrations has shown that Campbell employs a qualified, well trained staff, therefore, the lack of qualification and training records has no effect on USGS products.

<u>Condition 4:</u> USGS has never imposed requirements for vendor qualification on Campbell Scientific. Campbell's consitent record of equipment reliability throughout the years and widespread acceptance of their equipment within the scientific community provides a high degree of confidence in equipment accuracy.

<u>Condition 5</u>: The PRT listed on calibration documentation was an error. The documentation has been corrected.

Condition 6, 7, 8: These programmatic conditions have no effect on USGS products.

Campbell had anticipated the implementation of an ISO 9000 program. After approximately 18 months, they determined that the ISO program was not appropriate for them. They are now preparing a new system but in the interim, procedures and implementation of procedures lapsed.

Action to Preclude Recurrence: Block 20

USGS will provide better communications with vendors establishing new QA Programs.