



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Reply to:
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TO: James E. Kennedy, M/S 4-H-3

FROM: Paul T. Prestholt, Sr. On-Site Licensing Representative

DATE: August 3, 1988

SUBJECT: NNWSI PROJECT/WMPO VERIFICATION AND CLOSURE OF SDRs;
(2) NNWSI PROJECT/WMPO VERIFICATION AND CLOSURE OF
NCRS

Please find enclosed the above-referenced information.

PTP:nan
cc: J. J. Linehan w/o enc.

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PDR WASTE PDC
WM-11

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WM-11
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Department of Energy

Nevada Operations Office

P. O. Box 98518

Las Vegas, NV 89193-8518

APR 27 1988

Carl P. Gertz, Project Manager, WMPO, NV

NEVADA NUCLEAR WASTE STORAGE INVESTIGATIONS PROJECT/WASTE MANAGEMENT PROJECT OFFICE (WMPO) VERIFICATION AND CLOSURE OF NONCONFORMANCE REPORTS (NCRS)

A review was conducted on April 4, 1988, at Science Applications International Corporation facilities in Las Vegas, Nevada. The purpose of the review was to verify the corrective actions necessary to close NCR-020 from surveillance report SR-028.

Based on the objective evidence reviewed, WMPO Training Record Form No. NQA-020, 6/85, dated June 24, 1986, NCR No. WMPO-020 is considered closed. A copy is enclosed for your records.

If you have any questions, please contact me at 295-8913.

Wendell B. Mansel
For James Blaylock
Project Quality Manager
Waste Management Project Office

WMPO:JB-1959

Enclosure:
NCR NO. WMPO-020

cc w/encl:

V. J. Cassella, HQ (RW-123) FORS
Ralph Stein, HQ (RW-30) FORS
M. E. Spaeth, SAIC, Las Vegas, NV
S. H. Klein, SAIC, Las Vegas, NV
Stephen Metta, SAIC, Las Vegas, NV
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W. R. Dixon, WMPO, NV
M. P. Kunich, WMPO, NV

03231

NONCONFORMANCE REPORT

N-QA-009
11/85

PART I - INTIATION

Originator/Organization Sandy Williams/SAIC

Assigned Quality Assurance Level I NCR No. WMPO-20 NCR Date 4-7-86

Nonconforming Item or Activity and Responsible Organization Approving an NNWSI Project activity without approving a QLAS

Specification/Drawing/Procedure Requirements See attached

Deficiency Giving verbal approval to USGS to start an activity without first reviewing and approving a Quality Level Assignment Sheet (QLAS)

PART II - PERSON/ORGANIZATION ASSIGNED DISPOSITION RESPONSIBILITY

PART III - DISPOSITION

Repair

Rework

Use-as-is

Reject/Scrap

Describe Technical Justification and Assignment of Responsibility During the week of March 13, a decision was made by WMPO to allow the Reynolds Electrical & Engineering Co., Inc. (REECO) daylight crew to set up and begin drilling eight (8) experimental holes near Test Cell C. These holes were to be used in the testing of prototype logging equipment. Since this was a non-licensing issue, WMPO felt correct in allowing the activity to proceed without the Quality Assurance Level Assignment Sheets (QALAS). If this was not done, the daylight crew would have been dismissed and the holes probably would not have been completed. (cont'd on page 2)

Approvals of Disposition

Dispositioner/Date Phil Clayton 3-31-88 Dispositioner/Date _____

Project QA/Date Ray S. Molo 2/21/88 WMPONTSO/Date _____

Disposition Action Complete Date _____

PART IV - VERIFICATION (Approved Disposition Verified and Examined)

Accept

Reject

New NCR No. _____

Project QA/Date Sandy Williams 4/4/88

Comments Cognizant WMPO RASEB personal attended a Training Session on SOP-02-02 "Assignment of QA levels to NNWSI activities & items" on June 24, 1986.

Specifications/Drawing/Procedure Requirements

NVO-196-17 Rev. 4 (NNWSI QA Plan); pg. vii under Policy, last paragraph states:

"Each participating organization shall assign the QA level and applicable QA criteria to the Project activities for which they are responsible in accordance with prescribed, written approved procedures. The assignment of QA levels shall be approved by WMPO prior to the start of the activity."

QMP-06-03 Rev. 0

"It shall be mandatory that the documents listed in Exhibit 02 receive a review in accordance with this procedure." "Documentation of quality levels assigned to an activity" is one of the items listed in Exhibit 02.

Part III (cont'd)

The WMPO R&SEB realizes that QALAS are necessary to show level assignments for all work activities, even those not related to licensing. The PQM has agreed to work with Branch personnel in further training of proper Quality Assurance (QA) procedures.



Department of Energy

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

APR 27 1988

Larry R. Hayes
Technical Project Officer
for NNWSI
U.S. Geological Survey
Mail Stop 421
P.O. Box 25406
Denver, CO 80225

NEVADA NUCLEAR WASTE STORAGE INVESTIGATIONS PROJECT/WASTE MANAGEMENT PROJECT OFFICE (WMPO) VERIFICATION AND CLOSURE OF NONCONFORMANCE REPORTS (NCRS)

A meeting was held with Alan Flint on March 23, 1988, at U.S. Geological Survey (USGS) facilities in Las Vegas, Nevada. The purpose of the meeting was to verify the corrective actions necessary to close NCR No. WMPO-036 from WMPO Surveillance Report No. 86-037.

Based on the meeting and objective evidence reviewed (USGS monthly reports from September 1986 through October 1987), NCR No. WMPO-036 has been closed. A copy of this NCR is enclosed for your records.

If you have any questions, please contact me at FTS 575-8913.

for 
James Blaylock
Project Quality Manager
Waste Management Project Office

WMPO:JB-1946

Enclosure:
NCR No. WMPO-036

NONCONFORMANCE REPORT

H-QA-009
TV86

PART I - INITIATION

Originator/Organization Sandy Williams/SAIC

Assigned Quality Assurance Level _____ NCR No. WMPO-36 NCR Date May 22, 1986

Nonconforming Item or Activity and Responsible Organization Writing computer programs and developing methodology/USGS

Specification/Drawing/Procedure Requirements NVO-126-17, Rev. 4, under "Policy" pg vii states "Each participating organization shall assign the QA Level (continued)"

Deficiency There are no QA Levels assigned to the work being performed.

PART II - PERSON/ORGANIZATION ASSIGNED DISPOSITION RESPONSIBILITY

USGS - WRD: K. W. Causseaux/D. Hammermeister

PART III - DISPOSITION

Repair Rework Use-as-is Reject/Scrap

Describe Technical Justification and Assignment of Responsibility See page 3 of NCR

_____ X

Approvals of Disposition

Dispositioner/Date *D. Hammermeister 11/5/86* Dispositioner/Date *K.W. Causseaux 12/17/86*

Project QA/Date *12/11/1986 12/22/86* WMPO/TSO/Date _____

Disposition Action Complete Date 12-22-86

PART IV - VERIFICATION (Approved Disposition Verified and Examined)

Items 2 & 4 Items 1 & 5 SDR
 Accept Reject New NCR No. SDR-055 Project QA/Date *Sandy Williams 4/5/87*

Comments See Page 4 of NCR

NCR No. WMP0-36
-Page-2-of-2

Specification/Drawing/Procedure Requirements (Cont'd)

and applicable QA criteria to the Project activities for which they are responsible in accordance with prescribed, written approved procedures. The assignment of QA Levels shall be approved by WMPO prior to the start of the activity.

WMPO Letter No. WMPO:JB-932, N. L. Vieth to W. W. Dudley, states:

"Prototype testing, experimentation, and other research intended to develop and/or evaluate techniques or procedures provided these activities have been approved by WMPO as Quality Assurance Level III. Continuance of these activities must not prevent adequate manpower resources from being applied to the implementation of the QA Program requirements."

and

"This suspension of work also applies to NNWSI Project related activities currently being performed for USGS by subcontractors unless the work can be clearly exempted as described above."

NONCONFORMANCE REPORT (NCR) WMFO-36
SURVEILLANCE NO. WMFO/NV-SR-86-037
PAGE 3 OF ⁽³³⁾ 4

PART III - DISPOSITION

REWORK: ITEMS 1, 2, 4, and 5 of Surveillance Report

We do not agree that Item 3 of the Surveillance Report is in nonconformance with D. L. Vieth's Stop Work Order of April 28, 1986. Mayra Castellanos was reading literature to prepare herself for developing Q.A. procedures.

Items 1 and 5 of the Surveillance Report deal with activities related to neutron logging. We were in nonconformance with D. L. Vieth's Stop Work Order but not for the reasons stated in the Surveillance Report. To discontinue neutron logging would cause irrecoverable loss of data. We did, however, fail to submit a letter to that affect to D. L. Vieth within 10 working days after receiving his letter.

Items 2 and 4 of the Surveillance Report address work related to artificial infiltration prototype testing. We were in nonconformance with D. L. Vieth's Stop Work Order because we had not received approval on the QALAS we had submitted. The PI was under the impression that he could begin work on the prototype tests as soon as he had received approval signatures at the NNWSI-USGS level. This confusion stemmed from the Stop Work Order and lack of an approved QA manual.

CORRECTIVE MEASURES:

For items 1 and 5 work is continuing on neutron logging in accordance with HP-62 R0 in order to avoid the loss of irrecoverable data. For items 2 and 4 all work has been stopped and the data is being retained pending WMFO's approval of the related QALAS. The QALAS and SIP we have been preparing are being revised to conform to the newly approved QA manual and will be submitted for formal approval at the earliest possible date. Copies of the current draft of the SIP and QALAS are enclosed as evidence of our ongoing planning activities and to request continuance of neutron logging.

Part IV Verification

The USGS dispositions to items 2 and 4 have been verified. The applicable QALAS obtained WMPO approval as of October 30, 1987. No work was performed on these activities as was committed to in the corrective action to the NCR. This absence of activity was verified by personal discussion with members of the USGS staff and by a study of the monthly reports. The current PI also confirmed that no activity took place.

Accordingly, items 2 and 4 are considered closed.

The WMPO agrees that Item 3 was a non-issue and did not intend it as part of the NCR.

The verification for Items 1 and 5 is unacceptable. The nonconformance has since been "rolled over" into SDR-055 (WMPO-SR-87-015) in accordance with QMP-16-03, Rev. 0.

NCR WMPO-036 is now considered closed.



Department of Energy

Nevada Operations Office
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Las Vegas, NV 89193-8518

APR 27 1988

Larry R. Hayes
Technical Project Officer
for NNWSI
U.S. Geological Survey
Mail Stop 421
P.O. Box 25406
Denver, CO 80225

**NEVADA NUCLEAR WASTE STORAGE INVESTIGATIONS PROJECT/WASTE MANAGEMENT PROJECT
OFFICE (WMPO) VERIFICATION AND CLOSURE OF STANDARD DEFICIENCY REPORTS**

A meeting was held on March 18, 1988, at U.S. Geological Survey/Science Applications International Corporation facilities in Denver/Golden, Colorado. The purpose of the meeting was to verify the corrective actions necessary to close WMPO (Standard Deficiency Reports/Audit Finding Sheets (AFSS)) from audit/surveillance reports 8512 and 862a. A total of four deficiency documents were reviewed in the course of this meeting.

Based on the objective evidence reviewed, AFSSs 8512-3 and 8512-5 are considered closed. Copies of these AFSSs are enclosed for your retention.

If you have any questions, please contact me at FTS 575-8913.

For Wendell B. Mansel
James Blaylock
Project Quality Manager
Waste Management Project Office

WMPO:JB-1949

Enclosure:
AFSSs 8512-3 and 8512-5



WMPO AUDIT FINDING SHEET (AFS)

N-QA-02-6/85

(To be used for all AFSs with added sheets as required)

Audit Finding No. 8512-3 Audited Checklist Reference 85-12-1 10.0

Audited Organization USGS/Denver Page 3 of 8

Organization Unit Quality Assurance Activity Personnel Qualification

Response Assigned To QA Manager Reported By (Auditor) M. J. Kowalewski, Jr.

Requirement (Cite) NWM-USGS-QAPP-01, Rev. 1, Page 7 of 26 - "...Personnel performing tasks that require skill, experience, or training shall be qualified. Certification of qualification shall be documented for each individual by means of a USGS (cont'd).

Finding USGS Professional/Personnel Records (Office of Personnel Management Standard Form No. 171) were not available for review and verification by the audit team due to restrictions in reviewing personnel information.

Approved By LA MJ Kowalewski Response Due Date 10-31-85

Approved By WMPO/NV James Blaylock Date 10/31/85

Response (To be completed by audited organization) NNWSI-USGS-QMP-2.03, RO resolves this finding. Attachment 1 of QMP 2.03 will be completed for all NNWSI-USGS technical personnel and key personnel who are no longer associated with NNWSI.

Implementation Date 1/17/86 Submitted By J. Wellman Date 12/2/85

To be completed by lead auditor (LA) and reviewed by WMPO/NV

Corrective Action Response
 Satisfactory Unsatisfactory

Reviewed by LA/Date MJ Kowalewski 1/16/86

Reviewed by WMPO/NV/Date James Blaylock 1/29/86

Corrective Action Implementation
 Satisfactory Unsatisfactory

Reviewed by LA/Date AKC 3/18/88

Reviewed by WMPO/NV/Date Roy Sano 3/24/88

Reaudit Date _____

Remarks Verification of audit findings is subject to WMPO review and approval before audits can be closed out.

Audit Finding Closed LA Concurrence/Date J. Wellman MAR 23 1988

Reference and Number(s) for unsatisfactory reaudit _____

ENCLOSURE

AUDIT REPORT 85-12
(8512-3, page 2)

Requirement (cite) (continued)

Professional/Personnel Record (Office of Personnel Management Standard Form No. 171) or on a form made up for this purpose. This document shall be retrievable."



WMPO AUDIT FINDING SHEET (AFS)

N-OA-0
6/85

(To be used for all AFSs with added sheets as required.)

Audit Finding No. 8512-5 Audited Checklist Reference 85-12-3, Page 21

Audited Organization USGS/Denver 3

Organization Unit X-ray Diffraction and Mineral Separates Activity X-ray Diffraction

Response Assigned To QA Manager Reported By (Auditor) M. J. Kowalewski, Jr.

Requirement (Cite) NWM-USGS-UTP-03, Rev. 0 - Paragraph 9.0 states: "Technical detailed procedures for Geologic Investigations shall be prepared for each of the subjects listed below. The list shall not preclude the development or acquisition of additional procedures.."

Finding The X-ray Diffraction and Mineral Separates Division is performing analyses at the request of the Geologic Investigations Division. The results of the X-ray Diffraction Division's analyses have been used in open file reports without documented NNWSI (con

Approved By LA M. J. Kowalewski, Jr. Response Due Date 10-31-85

Approved By WMPO/NV James Blaylock Date 10/31/85

Response (To be completed by audited organization) The supporting documentation of the analyses performed by the X-ray Diffraction and Mineral Separates Division of the Geologic Division, USGS, for the NNWSI Project will be processed in accordance with NNWSI-USGS QMP 17.01 and as applicable to QMP 15.01 and QMP 17.02 (Verification of old data, pre-OA) Future analyses will be performed by QA qualified labs.

Implementation Date per response Submitted By [Signature] Date 12/4/85

To be completed by lead auditor (LA) and reviewed by WMPO/NV

Corrective Action Response
 Satisfactory Unsatisfactory

Reviewed by LA/Date M. J. Kowalewski 1/16/86

Reviewed by WMPO/NV/Date James Blaylock 1/24/86

Corrective Action Implementation
 Satisfactory Unsatisfactory

Reviewed by LA/Date [Signature] 28 Mar 88

Reviewed by WMPO/NV/Date [Signature] 3/28/88

Reaudit Date _____

Remarks Verification of audit findings is subject to WMPO review and approval before audits can be closed out.

Audit Finding Closed LA Concurrence/Date [Signature] 28 Mar 88

Reference and Number(s) for unsatisfactory reaudit Revised response received as follows per closing this finding. Evidence received 3/16/88 confirms existence of subject procedure at time of 8512 ... 0:2

AUDIT REPORT 85-12
(8512-5, page 2)

Finding (continued)

Project QA program controls. UTP-03, Rev. 0 does not include x-ray diffraction and mineral separation techniques, nor are there any technical detailed procedures prepared for their work specific to NNWSI Project-related activities.