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W. W. Dudley, Jr.
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APR 28 1986

SUSPENSION OF U. S. GEOLOGICAL SURVEY (USGS) WORK ON NEVADA NUCLEAR WASTE STORAGE INVESTIGATIONS (NWSI) PROJECT ACTIVITIES BY WASTE MANAGEMENT PROJECT OFFICE (WMPO) (WMPO ACTION ITEM #86-1165)

This memo is a follow-up to the Quality Assurance (QA) Audit 86-2a and QA Surveillance WMPO/NV-SR-86-023 conducted on the USGS efforts that support the NWSI Project. I want to formally express my concerns about the situation with regard to QA at the USGS. It has been reported to me that the USGS technical staff, people who are committed to executing scientific studies, have not achieved a full appreciation of the importance of QA on this program. This is clearly a USGS management problem. After these many years of effort and expenditures the practice of QA at the USGS has not reached the level necessary to satisfy our standards. Also, it is doubtful that the present USGS work would meet the U. S. Nuclear Regulatory Commission's (NRC) expectations.

I have reviewed your memorandum suspending work at the USGS pursuant to the audit. Your actions are a positive management step necessary to correct the long-standing organizational deficiencies at the USGS in the practice of QA. We believe that your expeditious action in this area was essential in communicating USGS management recognition of the seriousness of this problem within the USGS, and a resolve toward meeting the requirements that are customary in the regulatory arena. It is essential that your scientific staff fully understand the situation, commit to meeting the requirements, and conform to the process as defined in your internal operation manuals. There is no longer any place in this Project for a scientific staff that does not accept and perform in accordance with the requirements established for QA.

We have spent some time reviewing the situation with the Stop Work Order. While we are generally in agreement with your approach, we believe that some additional stipulations need to be added to your directive. The purpose of this memo is to announce the WMPO suspension of work, expand somewhat the scope of your original statement, and outline the role of the Waste Management Project Office (WMPO) in reviewing the work situation before it is restarted.

This suspension of work applies to all USGS work currently being performed for the NWSI Project with the following exceptions:

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1. Planning, both internal and as part of the preparation of the Site Characterization Plan (SCP), the Exploratory Shaft Test Plan (ESTP), the Environmental Assessment (EA), and the Seismic Tectonic Position Paper (WMP:MRB-579).
2. Administrative/management work, with the exception of procurement of equipment, materials, supplies, and services to be used in technical activities unless such procurement can be shown to be critical to the success of those technical activities allowed to continue. If so, the details, including the quality requirements to be applied, shall be provided to WMPO for concurrence prior to proceeding.
- *3. Work for which the suspension would cause an irrecoverable loss of information.
- *4. Work in progress on degradable samples or features and laboratory measurements on "natural-state" samples that would degrade if the measurements were interrupted.
5. Preparation and processing of abstracts for meetings if the submission deadline is July 1986 or earlier. These abstracts must be specifically identified and the pertinent information, including manpower resources required, must be provided to the Waste Management Project Office (WMPO) for evaluation of the impact on resources required to achieve implementation of the QA Program.
6. 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.
7. All work that is necessary to achieve adequate implementation of the USCS QA Program, i.e. procedure development, establishment of Quality Assurance Level assignments, correction of QA Program deficiencies, etc.

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

*Specific activities in these categories or others that USCS strongly believes should be allowed to continue must be identified to WMPO in writing within 10 working days after receipt of this letter. The information to be provided must include the following:

- o Work Breakdown Structure (WBS) task title and numbers
- o Principal Investigator
- o Justification/rationale of why the work must proceed
- o Controls/procedures to be used to assure the data meets QA program requirements.

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Except for the work that must continue as previously noted, achieving adequate implementation of QA Program requirements is the highest priority of USGS/NNWSI Project at this time. Personnel should be redirected to QA Program implementation to the fullest extent possible. Accordingly, you are directed to develop a plan for the assignment and approval of Quality Assurance Levels (see Surveillance Report WMPO/NV-SR-86-023) which shall include the support package agreed to during the Quality Assurance Level Assignment Sheet (QALAS) Workshop meetings at Science Applications International Corporation during April 2, 9 and 10, 1986, and a plan for correcting the QA Program deficiencies identified during USGS Audit 86-2a so that the USGS work for the NNWSI Project can resume. This plan should identify the specific tasks to be accomplished, establish priorities, and provide a schedule for implementation. Emphasis should be placed on correcting the deficiencies in those areas where work is allowed to continue, i.e. establishment of Quality Assurance Level assignments, qualification and certification of personnel, indoctrination and training, etc. This plan must be submitted to WMPO for review and approval by May 1, 1986. It should be noted that WMPO will perform periodic surveillances of USGS activities to ensure that work is suspended until all required actions are completed and to evaluate progress relative to QA Program implementation.

The conditions for lifting this suspension are as follows:

1. Approval by WMPO of proposed corrective actions and schedules for implementation for the reported audit findings.
2. Approval by WMPO of the USGS Quality Assurance Program Plan (QAPP) revised as a result of the audit.
3. Completion of indoctrination and training of all USGS personnel responsible for achieving quality with the NNWSI program.
4. WMPO approval of Quality Assurance Levels for each NNWSI Project item/activity for which USGS is responsible.
5. WMPO approval of a USGS plan to provide resources for QA coverage at the various locations where USGS is performing ongoing NNWSI Project activities.

At the completion of all of the above conditions a formal removal, in writing, of the suspension will be issued to USGS by WMPO.

Based on the number and nature of the deficiencies identified during USGS Audit 86-2a, it is evident that the USGS QA staff must be supplemented with additional experienced QA personnel in order to assure proper implementation of the USGS QA Program for the NNWSI Project. An unmitigated commitment to achieving this goal is clearly required. If you have any questions, or require further information, please advise.

WMPO:JB-932

Original Signed By
Donald L. Vieth

Donald L. Vieth, Director
Waste Management Project Office

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cc:

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