



**Department of Energy**

Washington, DC 20585

QA: L

**MAY 13 1997**

**R. W. Craig, Technical Project Officer  
for Yucca Mountain Site  
Characterization Project  
U.S. Geological Survey  
1261 Town Center Drive  
Building 12, Room 1249, M/S 423  
Las Vegas, NV 89134**

**ISSUANCE OF DEFICIENCY REPORTS (DR) YM-97-D-039 THROUGH YM-97-D-041  
RESULTING FROM OFFICE OF QUALITY ASSURANCE (OQA) AUDIT USGS-ARC-97-15**

Enclosed are DRs YM-97-D-039 through YM-97-D-041 generated as a result of the OQA Audit USGS-ARC-97-15.

Please provide responses to these deficiencies that meet the applicable requirements of Administrative Procedure 16.1Q, Performance/Deficiency Reporting. Send the originals of your responses to Deborah Sult, OQA/QATSS, P.O. Box 30307, Mail Stop 455, North Las Vegas, Nevada 89036-0307. Responses to the DRs are due 20 working days from the date of this letter. Extensions to due dates must be requested in writing, with appropriate justification, prior to the due dates.

If you have any questions, please contact either James Blaylock at (702) 794-1420 or Cynthia A. Humphries-Alder at (702) 794-1336.

*James Blaylock for*  
Donald G. Horton, Director  
Office of Quality Assurance

OQA:JB-1526

Enclosure:  
DRs YM-97-D-039 through  
YM-97-D-041

9705210207 970513  
PDR WASTE PDR  
WM-11

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**OFFICE OF CIVILIAN  
RADIOACTIVE WASTE MANAGEMENT  
U.S. DEPARTMENT OF ENERGY  
WASHINGTON, D.C.**

8  Performance Report  
 Deficiency Report

NO. YM-97-D-039

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**PERFORMANCE/DEFICIENCY REPORT**

<p>1 Controlling Document: USGS-YMP-QMP-03 16, Revision 0</p>	<p>2 Related Report No USGS-ARC-97-15</p>
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<p>3 Responsible Organization U S GEOLOGICAL SURVEY (USGS)</p>	<p>4 Discussed With: Martha Mustard, Bruce Parks</p>
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5 Requirement/Measurement Criteria

YMP-USGS-QMP-3 16, Revision 0, controls scientific elicitation. The process was initiated on or before October 1996, yet the procedural requirement has not been implemented in a timely manner.

6 Description of Condition

Although implementation was initiated on or before October 1996, the Project Plan, which addresses the process in detail from stating the objective of the expert elicitation through the review and approval of the product, was not approved until April 30, 1997. Likewise, the attestation of qualifications has not been documented for many of the participants in the process.

<p>7 Initiator James Blaylock <i>Blaylock</i> Date <u>5/7/97</u></p>	<p>9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown; Must be Yes if PR</p>
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10 Recommended Action (Not required for PR)

<p>11 QA Review QAR <i>James Blaylock</i> Date <u>5/8/97</u></p>	<p>12 Response Due Date 20 working days from issuance</p>
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<p>13 Affected Organization QA Manager Issuance Approval (QAR for PR) Printed Name <u>D G HERTON</u></p>	<p>Signature <i>James Blaylock</i> Date <u>5/12/97</u></p>
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<p>22 Corrective Action Verified QAR _____ Date _____</p>	<p>23 Closure Approved by (N/A for PR) AOQA:1 _____ Date _____</p>
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**PERFORMANCE/DEFICIENCY REPORT RESPONSE**

14 Remedial Actions

15 Extent of Condition (Not required for PR)

16 Root Cause Determination (Not required for PR)

Required  Yes  No

17 Action to Preclude Recurrence (Not required for PR)

Required  Yes  No

18 Corrective Action Completion Due Date

19 Response by

Initial

Amended

Date

Phone

20 Response Accepted

QAR

Date

21 Response Accepted (N/A for PR)

AOQAM

Date

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8  Performance Report  
 Deficiency Report

NO. YM-97-D-040

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**PERFORMANCE/DEFICIENCY REPORT**

<p>1 Controlling Document AP 17 1Q, "Record Source Responsibilities for Inclusionary Records." Revision 0</p>	<p>2 Related Report No USGS-ARC-97-15</p>
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<p>3 Responsible Organization U S GEOLOGICAL SURVEY (USGS)</p>	<p>4 Discussed With R Craig, T Chaney and M Mustard</p>
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5 Requirement/Measurement Criteria

AP 17 1Q, Section 2 0, Applicability, states "This procedure applies to all individuals within Affected Organizations Records in progress before the effective date of this procedure may continue under the procedure in effect at the time of the records' initiation, however, records begun on or after the effective date of this procedure must comply with this procedure."

6 Description of Condition

AP 17 1Q, Revision 0, was issued with an effective date of 11/22/96. Also on 11/22/96, a letter (Brandt & Adams to Distribution) was transmitted to Affected Organizations (including USGS) directing implementation of AP 17 1Q and cancellation of existing record source procedures within 90 days (February 20, 1997). To date, USGS has not implemented AP 17 1Q, nor has it canceled its QMP-17 01 procedure.

Several records/record packages were recently transmitted by USGS to the Records Processing Center (RPC). These records were prepared and submitted in accordance with QMP-17 01, Revision 9. Based on discussion with RPC personnel, the recent transmittals, which are part of a backlog pending processing, will be unacceptable to the RPC, since they do not meet AP-17 1Q requirements.

<p>7 Initiator <i>John P. Hodge</i> Date <u>5/7/97</u></p>	<p>9 Is condition an isolated occurrence? <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No    <input type="checkbox"/> Unknown, Must be Yes if PR</p>
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10 Recommended Action (Not required for PR)

Implement AP 17 1Q and project direction in the 11/22/96 letter

Coordinate concerns with AP 17 1Q implementation with the CRWMS M&O records management organization

<p>11 QA Review QAR <i>John P. Hodge</i> Date <u>5/7/97</u></p>	<p>12 Response Due Date 20 working days from issuance</p>
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<p>13 Affected Organization QA Manager Issuance Approval (QAR for PR) Printed Name <u>DG HOLTEN</u> Signature <i>James B. Baylond Jr.</i></p>	<p>Date <u>5/13/97</u></p>
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<p>22 Corrective Action Verified QAR _____ Date _____</p>	<p>23 Closure Approved by (N/A for PR) AOQAM _____ Date _____</p>
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PR/DR NO YM-97-D-040

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PERFORMANCE/DEFICIENCY REPORT RESPONSE

14 Remedial Actions

15 Extent of Condition (Not required for PR)

16 Root Cause Determination (Not required for PR)

Required  Yes  No

17 Action to Preclude Recurrence (Not required for PR)

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18 Corrective Action Completion Due Date

19 Response by

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Date

Phone

20 Response Accepted

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Date

21 Response Accepted (N/A for PR)

AOQAM

Date

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8  Performance Report  
 Deficiency Report

NO. YM-97-D-041

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**PERFORMANCE/DEFICIENCY REPORT**

1 Controlling Document  YAP-15 1Q, Revision 2, ICNI	2 Related Report No  USGS-ARC-97-15
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3 Responsible Organization  U S GEOLOGICAL SURVEY (USGS)	4 Discussed With  Wayne Rodman - Tom Chaney
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5 Requirement/Measurement Criteria

5 1 1 When a nonconforming item or sample is identified, personnel initiates a NCR

6 Description of Condition

NCRs are not being initiated at the time a nonconformance is identified. i.e. NCR USGS-97-0001  
Nonconformance occurred 8/5/96. NCR drafted 12/19/96 closed 4/2/97  
NCR USGS-97-0004 nonconformance identified 1/28/97. NCR drafted 3/5/97

7 Initiator Hank Greene <i>Hank Greene</i> Date <u>5/17/97</u>	9 Is condition an isolated occurrence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown. Must be Yes if PR
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10 Recommended Action (Not required for PR)

- 1 Review extent of condition and determine any impact
- 2 Provide management direction and training on the proper use of the NCR system and emphasize the importance of documenting nonconformances on the NCR at the time of occurrence

11 QA Review QAR <i>Hank Greene</i> Date <u>5/7/97</u>	12 Response Due Date 20 working days from issuance
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13 Affected Organization QA Manager Issuance Approval (QAR for PR) Printed Name <u>DG HECHER</u>	Signature <i>James Blaylock</i> Date <u>5/13/97</u>
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22 Corrective Action Verified QAR _____ Date _____	23 Closure Approved by (N/A for PR) AOQAM _____ Date _____
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**PERFORMANCE/DEFICIENCY REPORT RESPONSE**

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AOQAM

Date

R. W. Craig

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MAY 13 1997

cc w/encl:

~~W. O. Thomas~~ NRC, Washington, DC  
S. W. Zimmerman, NWPO, Carson City, NV  
T. H. Chaney, USGS, Denver, CO  
D. J. Sinks, OQA/USGS, Denver, CO  
A. M. Whiteside, OQA/USGS, Denver, CO

cc w/o encl:

W. L. Belke, NRC, Las Vegas, NV  
C. A. Humphries-Alder, OQA/QATSS, Las Vegas, NV  
D. G. Sult, OQA/QATSS, Las Vegas, NV  
R. W. Clark, DOE/OQA, Las Vegas, NV