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09-193-LK (L)

September 30, 2009

Kathy Gilmore, Quality Assurance Officer
311 Highland Fairway Lane
Wylie, TX 75098

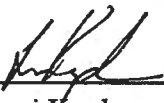
Response to Quality Assurance Audit Report #NWRPO-2009-01.

Dear Ms. Gilmore,

Enclosed please find responses to Quality Assurance Audit Report #NWRPO-2009-01, dated August 25, 2009. These responses fulfill the requirements set forth in Quality Assurance Procedure QAP-18.1, *Audits and Surveillances*.

If you have any questions regarding the contents of these responses, or need further information, please do not hesitate to contact me by telephone at 775-727-7727, or by email at lkryder@co.nye.nv.us.

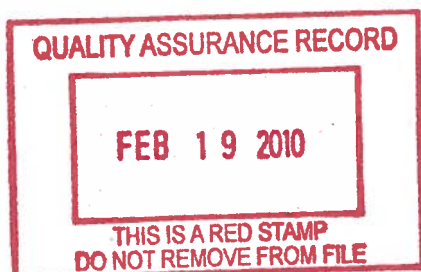
Sincerely,
NYE COUNTY, NEVADA



Levi Kryder
Geoscience Manager

LK/blm

Enclosures: As stated



7697.01

Response to Audit Report #NWRPO-2009-01

To: Kathy Gilmore, Quality Assurance Officer

From: Levi Kryder, Geoscience Manager

Cc: Darrell Lacy, Director
QARC

Subject: Response to Quality Assurance Audit Report #NWRPO-2009-01

This document fulfills the requirements set forth in Section 5.3.7 of Quality Assurance Procedure QAP-18.1, *Audits and Surveillances*, for the response to audit reports. Responses are grouped by Findings and Observations, for consistency with the original audit report.

Finding 1:

QAP-3.1 Rev 2, *Independent Technical Review*, states the required technical review process in Section 5.1.3. It was found that two of the technical report RID packages reviewed during the audit did not include the technical review forms as specified in QAP-3.1.

Response 1:

The Quality Assurance Officer (QAO), Quality Assurance Records Specialist (QARS), and Geoscience Manager will require Principal Investigators to complete and submit technical review forms with their annual reports, or when otherwise appropriate.

Finding 2:

QAP 6.1 Rev 2, *Issue and Control of Quality Assurance Documents*, states the responsibilities of NWRPO personnel who are issued controlled QA documents. These responsibilities include keeping QA manuals up to date.

After reviewing staff QA manuals it was found that one manual included archived out-dated procedures and was missing one change notice form.

Response 2:

This issue was corrected by the QARS and QAO at the time of the audit, and no further action is required (per Audit Report #NWRPO-2009-01).

Observation 1:

QAP-3.2 Rev 3, *Documentation of Technical Investigations*, states scientific notebook guidelines in Section 5.2.

Several entries in scientific notebooks reviewed during the audit appeared incomplete, incorrect, or lacking sufficient detail. Specific notebook entries flagged during the audit were discussed with staff during the post-audit meeting. Flagged entries included:

- Incorrect flowrate calculations
- Incorrect times recorded for purposes of calculating flowrates

Response to Audit Report #NWRPO-2009-01

- Water level measurements were recorded without the sounder number, measurement location, and units (ft) .
- Units missing from pressure readings and length measurements
- Missing meter calibration documentation when taking water parameter readings
- Unclear documentation of purging and total volumes purged

Response Obs1:

The incorrect notebook entries identified have been corrected by their authors. In addition, issues related to appropriate notebook entries were discussed in the post-audit conference. The importance of making concise, correct entries and calculations was discussed, as well as avoiding duplicate entries in multiple scientific notebooks. Additionally, errors (similar in type to those identified during the audit) were identified in Scientific Notebook #177 and corrected.

One additional problem identified during the process of correcting notebook entries is that many of the errors or omissions in the notebooks were not flagged or identified by the persons signing the "Read and Understood" lines on the notebook pages. In order to improve the Read and Understood process, additional notebook training will be conducted.

Observation 2:

QAP-5.2 Rev 3, *Preparation of Work Plans, Test Plans, and Technical Procedures*, states in Section 4.0:

"NWRPO personnel shall possess the appropriate level of training required to implement WPs, TPNs, or TPs . Training shall be completed before implementation of the plan or procedure and documented on the Training Form (Attachment 1) depending on the level of training determined by the QAO."

While it was stated by staff that training for various technical activities had been completed, no documentation for those activities was found in the QARC.

Response Obs2:

Training forms for individuals performing tasks identified during the audit have been completed and submitted to the Quality Assurance Records Center. In the future, training forms will be signed at the time formal QA training is conducted. Additionally, sign-in sheets will be used to track attendance at QA training sessions, and will be included as part of the training documentation package.