

AUDIT A-12-09
 March 6 – 8, 2012
 CCP QA Program



No.	Who	Description of Concern	Requirements Comments
1	C. Castillo	<p>Documentation was not provided to show evidence that the following CCP positions were analyzed to determine task responsibilities:</p> <ul style="list-style-type: none"> • RH Waste Radiological Characterization Technical Staff • NDA Expert Analyst 	<p>CCP-QP-002, <i>CCP Training and Qualification Plan</i>, Rev. 31, Section 3.3.2: "CCP Training supports the CCP Lead SPM in evaluating training and qualification requirements of each position. This may be done by, <u>but is not limited to</u>, evaluating training requirements using a training analysis."</p> <p>DOE/CBFO-94-1012, <i>Quality Assurance Program Document (QAPD)</i>, Rev. 11, Section 1.2.1: "The responsible organization shall analyze each job position to determine the task responsibilities of the position subject to the QAPD. The analysis</p>



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			shall identify minimum education, experience, and training prerequisites for each position involved in the planning, performance, or verification of activities subject to the QAPD, commensurate with the scope, complexity, and nature of the work."
2	C. Castillo	<p>During the adequacy review of CCP-QP-002, <i>CCP Training and Qualification Plan</i>, Rev. 31, the following concerns were identified:</p> <ol style="list-style-type: none"> Regarding general training requirements: Section 4.1.2 [E.4] states, "All approved training materials shall be maintained, secured, and controlled in the CCP Training area." Approved Table-Top Job Analysis and other training materials are stored in places other than the Training Area. <p>Section 4.1.2 [H] states, "Unsatisfactory performance will result in disqualification by the CCP Manager responsible for Training. Recommend adding verbiage after first sentence: "Once disqualified, the operator is removed from the applicable LOQIs and the candidate must successfully complete the initial CCP Qualification Card to re-establish qualification.</p>	

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		<p>If this instruction is not added to the procedure there is a high probability or potential where an unqualified individual will remain on applicable LOQIs and will continue to operate even though they have been disqualified by the Training Manager.</p> <p>2. Attachment 4 – <i>CCP Test Drum Data Sheet for Contact-Handled Waste (Continued)</i>:</p> <ul style="list-style-type: none"> • This is the 2nd page of the Data Sheet and is missing a form field #7. <p>3. Attachment 5 – <i>Training Container Instructions</i>:</p> <ul style="list-style-type: none"> • Section 2.0 instructs completion of Blocks 1-5 of Attachment 6 (which is the Training Container Evaluation Data Sheet). This should be completion of Blocks 1-4. • Section 3.0 instructs documentation of discrepancies on Block 6 of Attachment 6; this should be done on Block 5. • Section 4.0 instructs recording of pass or fail on Block 7 of Attachment 6, this should be recorded on Block 6. <p>4. Attachment 6- <i>Training Container Evaluation Data Sheet</i>:</p> <ul style="list-style-type: none"> • This attachment is missing a form field #8. 	

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3	K. Martin	<p>Per DOE/CBFO-94-1012, Quality Assurance Program Document, Rev. 11, Section 1.4.1I, "Evidence of review comment resolution shall be maintained on the originating organization's records inventory and disposition schedule (RIDS).</p> <p>Washington TRU Solutions (WTS)/Retrieval, Characterization, and Transportation (RCT)/Central Characterization Project (CCP)/Contract Handled (CH) for All Sites RIDS Item No. 18 and WTS/RCT/CCP/Remote Handled (RH) for All Sites RIDS Item No. 12 state "CCP Procedures, Plans and Reports – Original controlled procedures, plans, and reports and approval documentation." This item DOES NOT include evidence of comment resolution verbiage in as required by CBFO QAPD.</p>	<p>DOE/CBFO-94-1012, Quality Assurance Program Document, Rev. 11, Section 1.4.1I, "Evidence of review comment resolution shall be maintained on the originating organization's records inventory and disposition schedule (RIDS).</p>
4	K. Martin	<p>The transmittal for "M110_UCNI" Electronic File of Historical PDF Source Documents for LANL-4 Contains an UCNI Document" dated 11/21/2011 DOES NOT contain the required statement in the comment section.</p>	<p>CCP-QP-008, CCP Records Management, Rev. 19, Section 4.11.1 [A] states "Documents identified as UCNI must be transmitted to CCP Records with an Attachment 2 and the transmittal must have the following statement placed in the comment section:</p> <p>Matter transmitted contains Unclassified</p>

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			Controlled Nuclear Information. When separated from enclosures, this transmittal document does not contain UCNI.
5	K. Martin	Additional information was added to the CCP Radiography Independent Technical Reviewer Checklist page of INRTR5120001 BDR. This addition of information was dated, but was not initialed.	CCP-QP-008, Rev. 19, CCP Records Management, Section 4.7.1 [B.1] states "IF any additional information needs to be added to a record, THEN enter the notation, AND initial and date each notation(s) made.
6	K. Martin	FEW Tracking Form from RHANLDG12003 BDR contains highlighter.	CCP-QP-008, CCP Records Management, Rev. 19, Section 4.2 NOTE states "Highlighter marking pens SHALL NOT be used on records."

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7	N. Frank	<p>The more recent records for software do not include the printout of the code or cells and the cell formulas for Excel spreadsheets. Examples include:</p> <ul style="list-style-type: none"> • SCO 822, CCP DataCenter Module for the QA – SQA, Version 1. • SCO 1022, CCP SQS, Version 1 • SCO 1065, WDS Master Template.xls, Version 6 • SCO 1075, SQS WDS Master Template.xls, Version 3 • SCO 1092, Summary_Statistics.xls, Version 1 • SCO 1099, Cert Tracker.xls, Version 0 	<p>CCP-QP-022, Rev. 12 4.3.4 New Application within COTS or System Software [D] Develop a functional description of the software, including source code listing, such as formulas within cells, macros, etc.</p>
8	N. Frank	<p>Noted that the ftp site URL was not correct in the procedure. Reviewed the "Freeze File" for CCP-QP-022, R12, and noted that a change has been identified for the ftp site address. The process as actually performed isn't exactly as described in the procedure. The Freeze File includes several changes to the process.</p>	<p>CBFO QAPD Rev. 11 2.1.2 Individuals performing work shall comply with implementing procedures; however, when work cannot be accomplished as described in the implementing procedure or accomplishment of such work would result in an undesirable situation, a condition adverse to quality, or an unacceptable safety</p>

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			risk, the work shall be suspended until the appropriate procedure change provisions are implemented.
9	C. Castillo	<p>Objective evidence was not provided to show that CCP training maintains documentation of current CCP personnel training status.</p> <p>NOTE: Training Status list was provided to auditor.</p>	CCP-QP-002, CCP Training and Qualification Plan, Rev. 31, Section 3.3.5 states, "CCP Training maintains documentation of current CCP personnel training status."
10	R. Castillo	<p>CCP-QP-005, Revision 21 became effective on 3/5/2012. Savannah River Site generated two NCRs on 3/5/2012 with the following numbers: NCR-SRS-0256-12 and NCR-SRS-0257-12. Although CCP-QP-005, Revision 21 was issued the day the NCRs were written, the NCRs were written on the Revision 20 version of the NCR form, Attachment 1. The justification given was that the two SRS NCRs were written in the morning, when CCP-QP-005, Revision 20 was still effective, and CCP-QP-005, Revision 21 didn't become effective until 1:00pm MDT on 3/5/2012.</p> <p>It was discovered that Document Services issued CCP-QP-005, Revision 21 @9:38am MDT on 3/5/2012. Also, it was discovered through interviews with Document Services that anyone with access to the SFTP site and/or Q&MIS would have access to CCP-QP-005, Revision 21.</p>	

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11	C. Castillo	<p>The current system used for maintaining training requalification status for CCP operational personnel is a manual system. Currently, the LOQI, which is only a tool, is being utilized to maintain qualification and requalification status and it is the determining factor as to when to issue requalification cards. There is not an automated system in place. After interviews with CCP Training personnel, it is determined that the current manual system is cumbersome, and poses a potential risk for human error. A more modern, automated system of maintaining status should be developed/utilized to enhance the program for requalification tracking.</p>	
12	K. Martin	<p>QA records in document review records packages have significantly changed since the last audit. For example the following information formerly contained in these packages was no longer included:</p> <ul style="list-style-type: none"> • Comment Resolution evidence • Attachments of Comments/Resolution of emails • Document Revision Requests • SPM emails regarding 5 day CBFO Notification <p>Therefore, the QA Records requirements for such packages may not have been completely identified.</p>	<p>CCP-QP-010, Rev. 22, CCP Document Preparation, Approval, and Control, Section 2.3.3 [H], "Identification and classification of QA records generated by the implementing procedure."</p> <p>CCP-QP-008, Rev. 19, CCP Records Management, Section 4.1.1 [C], "Identify records in the implementing procedures."</p>

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13	G. Knox	<p>There is no objective evidence that the M&TE Custodian is maintaining an M&TE usage history as required by CCP-QP-016 rev 16, §4.3.7.</p> <p>Usage logs are maintained at the generator sites and are used in deficiency evaluations by the VPM, which are documented on CCP-QP-016, rev 16, Attachment 3 as required by procedure. This is not reflected in CCP-QP-016.</p>	<p>CCP-QP-016, rev 16, §4.3.7 requires the CCP M&TE Custodian to track usage of M&TE facilitate evaluation of deficiencies.</p> <p>CCP-QP-016, rev 16, attachment 2 defines M&TE usage history as a "Collection of data consisting of M&TE unique identification number, date M&TE was used, what M&TE was used on (e.g., tag, part number), and work control document (e.g., work packages, engineering maintenance standards, procedures, etc.). "</p>