



ENTERED
Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

MAY 23 2013



Mr. Jon E. Hoff, Manager
Quality Assurance
Nuclear Waste Partnership, LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-2078

Subject: Transmittal of the Audit Report for Audit A-13-14

Dear Mr. Hoff:

The Carlsbad Field Office performed Audit A-13-14 to evaluate the adequacy, implementation, and effectiveness of the Nuclear Waste Partnership, LLC (NWP) Quality Assurance Program related to Criteria 1 through 9 of the *Quality Assurance Program Requirements for Nuclear Facilities* (ASME NQA-1, 1989 Edition), and corresponding sections of the CBFO *Quality Assurance Program Document*. The audit was conducted April 30 – May 2, 2013.

The audit team identified one concern during the audit, which was determined to be a violation of the procedure governing the generation and approval of Preventative Maintenance Controlled Document Deletion Request forms. The concern was documented in CBFO Corrective Action Report (CAR) 13-031, which was transmitted under separate correspondence.

The team also made one Observation addressing the implementation of the Lessons Learned program, and offered one Recommendation to NWP management regarding the generation of Requests for Remittance for allowable costs. Both of these items are discussed in the attached report.

The audit team concluded that overall, the processes evaluated were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

The results of the audit and conclusions of the audit team are provided in detail in the enclosed report.

If you have any questions or comments, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure



Mr. Jon Hoff

-2-

MAY 23 2013

cc: w/enclosure

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D. Gadbury, CBFO	ED
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S. Ghose, EPA	ED
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T. Kliphuis, NMED	ED
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D. Winters, DNFSB	ED
G. White, CTAC	ED
G. Knox, CTAC	ED
D. Harvill, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution.

**U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE**

AUDIT REPORT

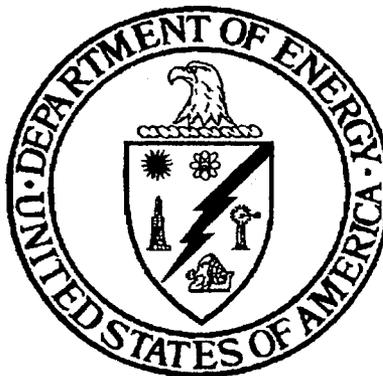
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AUDIT NUMBER A-13-14

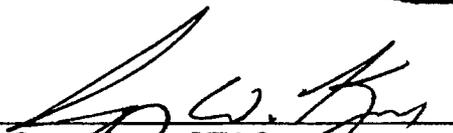
April 30 – May 2, 2013

**NUCLEAR WASTE PARTNERSHIP LLC
QUALITY ASSURANCE PROGRAM
NQA-1-1989 Criteria 1 – 9**

CARLSBAD, NEW MEXICO



Prepared by:


Greg Knox, CTAC
Audit Team Leader

Date:

22 MAY 2013

Approved by:


Martin P. Navarrete, CBFO
Acting Quality Assurance Director

Date:

5-23-13

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Audit A-13-14 was conducted April 30 – May 2, 2013, to evaluate the adequacy, implementation, and effectiveness of quality assurance (QA) and technical activities related to the Nuclear Waste Partnership LLC (NWP) Quality Assurance Program at the Waste Isolation Pilot Plant (WIPP). Activities were evaluated with respect to the requirements defined in DOE/CBFO-94-1012, *CBFO Quality Assurance Program Document (QAPD)*; WP 13-1, *NWP Quality Assurance Program Description*; and NWP implementing procedures.

The audit team concluded that overall, the NWP QA Program, as related to Criteria 1 through 9 of the American Society of Mechanical Engineers NQA-1-1989 Edition, *Quality Assurance Program Requirements for Nuclear Facilities (NQA-1-1989)*, was adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

The audit team identified one condition adverse to quality (CAQ) related to completing and approving Controlled Document Deletion Requests per approved procedures, which resulted in the issuance of Corrective Action Report (CAR) 13-031 (see section 6.0).

No isolated CAQs were corrected during the audit (CDA), one Observation was documented, and one Recommendation for improvement was offered to NWP management (see section 7.0).

2.0 SCOPE

The audit evaluated the adequacy, implementation, and effectiveness of the NWP QA Program related to NQA-1-1989 Criteria 1 through 9, and the corresponding sections of the CBFO QAPD.

The audit team verified implementation and evaluated documentation of implementing procedures. Evaluation of NWP procedures for adequacy was based on the CBFO QAPD, Rev. 11.

3.0 AUDIT TEAM

Martin Navarrete	QA Management Representative, CBFO
Greg Knox	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Berry Pace	Auditor, CTAC
Katie Martin	Auditor, CTAC
Cindi Castillo	Auditor, CTAC
Rick Castillo	Auditor, CTAC
Paul Gomez	Auditor, CTAC

4.0 AUDIT PARTICIPANTS

Individuals contacted during the audit are identified in Attachment 1. A pre-audit conference was held in the NWP Support Building large conference room on April 30, 2013. The audit was concluded with a post-audit conference in the NWP Support Building large conference room on May 2, 2013.

5.0 SUMMARY OF AUDIT RESULTS

5.1 Program Adequacy, Implementation, and Effectiveness

The audit team evaluated the associated implementing procedures to verify the adequate flow-down of upper-tier requirements, conducted interviews with responsible personnel, examined records storage locations, and reviewed randomly selected records to determine the degree to which the NWP QA Program addressing NQA-1-1989 Criteria 1 through 9 is implemented, and the overall effectiveness of the program.

The audited areas are described below. One concern, one Observation and one Recommendation were identified and are described in sections 6.0 and 7.0. Except as noted, the NWP QA Program was determined to be adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

5.2 Quality Assurance Program Audit Details

The audit addressed compliance to NQA-1-1989 Criteria 1 through 9. NWP implementing procedures for each criterion were selected for audit and are identified in Attachment 2. Each criterion is discussed in detail in the paragraphs below.

Criterion 1 – Organization

The NWP Organization was evaluated against the requirements of both NQA-1-1989 and the CBFO QAPD. The overall organization was defined in detail on the organization chart dated October 2012 (for internal distribution only). The QA Manager reports directly to the General Manager and QA responsibilities are defined in the *NWP Quality Assurance Program Description*, and WP 13-QA.04, *Quality Assurance Department Administrative Program*. As defined, QA responsibilities were found to meet NQA-1-1989 Criterion 1 requirements.

The audit team concluded that the NWP Organization is adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results. QA personnel are performing as assigned in the organization chart and in accordance with WP 13-QA.04.

Criterion 2 – Quality Assurance Program

The NWP QA Program is defined in WP 13-1, *NWP Quality Assurance Program Description*, and NWP implementing procedures. The audit team found that WP 13-1 adequately addresses the requirements of the CBFO QAPD.

The audit team also evaluated the NWP Training Program with a focus on the QA Department. The Training Implementation Matrix specifies Hazardous Waste Facility Permit (HWFP) and other required training for management personnel and for all positions that must be qualified. The team found all training had been properly completed and all training records were filed and available in NWP Training Records.

The Operating Experience/Lessons Learned (OE/LL) Program was evaluated in detail. The program is implemented and administered by one individual. The audit team identified one concern in this area: the OE/LL bulletins are posted to Bellview, where all employees with internet access should be able to select bulletins that are relevant to their activities, as described in WP 15-PA.01, Rev. 2.1.0, *Operating Experience/Lessons Learned Program*, section 1.0. However, not all employees with internet access appear in the OE/LL database, which prevents them from selecting relevant OE/LL bulletins (see section 7.1).

The audit team concluded that the NWP QA Program was adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

Criterion 3 – Design Control

The audit team conducted interviews with design control/engineering personnel and reviewed documentation to verify the Design Control Program meets upper-tier requirements and is implemented in accordance with NWP procedures WP 09-CN3007, Rev. 36, *Engineering and Design Document Preparation and Change Control*; WP 09-CN3018, Rev. 14, *Design Verification*; WP 09-CN3021, Rev. 14, *Component Indices*; WP 09-CN3023, Rev. 7, *Functional Classification Determination for Design*; WP 09-CN3024, Rev. 18, *Configuration Management Board/Engineering Change Proposal*; and WP 09-CN3031, Rev. 4, *Engineering Calculations*.

The audit team evaluated documents and activities associated with the control, issuance, and modification of engineering design documents. The team reviewed included drawings/sketches, calculations, design reviews, design verification, design changes, reviews of temporary modifications, and document issuance and control. Design activities are initiated by the Engineering Change Proposal and Engineering Change Order (ECO) processes.

The scope of the ECOs reviewed ranged from balance of plant to Management Level 1 (ML-1) [Quality Level 1 (QL-1)] items. The content of the ECOs included change sheets and redlines for drawings/sketches and design specifications, and forms documenting

the review for as low as reasonably achievable activities, the HWFP, environmental compliance, and unreviewed safety question determinations. The ECOs also included addendum sheets, engineering calculations, functional classifications, and Computerized History and Maintenance Planning System (CHAMPS) entries, which were evaluated by the audit team.

Engineering design records were stored in the engineering file room, as required, and maintained in accordance with the departmental records inventory and disposition schedule (RIDS) dated March 5, 2013.

No concerns were identified. Overall, the NWP Design Control activities were determined to be adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

Criterion 4 – Procurement Document Control

The audit team reviewed Procurement Document Control Program implementing documents, interviewed NWP personnel, and verified implementation activities for the processes described below.

Approval Request/Variation Request

The audit team verified that technical reviews are performed and documented on Approval Request/Variation Request (AR/VR) forms as required by WP 15-PC3041, Rev. 9, *Approval/Variation Request Processing*. The audit team reviewed AR/VR forms AR-10-7-4 and DOE13-R404496-15 (03A, 02C, and 17A) and the AR/VR Transmittal Register, and verified the AR/VR documents were approved. The team confirmed that document packages were submitted to Records per procedural requirements.

No issues were identified by the audit team for the AR/VR process.

Credit Card Purchases

The audit team interviewed the Credit Card Program Administrator and verified that a list of current authorized purchase card (P-Card) holders is maintained as required by WP 15-PC3042, Rev. 11, *Credit Card Purchases*. The list identifies each P-Card holder's organization, single procurement dollar limit, and maximum credit limit. The audit team verified the training and qualification of a sample of P-Card holders.

The audit team verified that P-Card holders maintain a list of suppliers and maintain files related to reconciliation of supplier transactions and credit card expenditures. The audit team reviewed P-Card holder lists and did not identify any P-Card purchases of QL-1 or QL-2 items.

The audit team selected suppliers recently added to the P-Card holder lists and verified

proper initiation of the Credit Card New Supplier Approval Forms required for placement of suppliers on the lists. The audit team verified that no purchases of restricted items have been requested and that P-card holders were aware they were required to obtain authorization to purchase such items. The team verified that P-Card holders perform receipt of purchased items and sign off on invoices after verification of the items.

No issues were identified by the audit team for the P-Card purchase process.

Request For Remittance

The audit team interviewed Procurement and Finance and Accounting personnel relative to the use of procedure WP 15-PC3043, Rev. 2, *Request for Remittance*. The audit team determined that personnel use WP 15-PC3043 as required when generating Requests for Remittance (RFRs). The team confirmed that the electronic Deltek system is used to generate RFRs for allowable expenses and a paper system is used to generate RFRs for other expenses. The audit team verified that WP 15-PC3043 governs both the Deltek and paper system RFR processes.

In evaluating procedure WP 15-PC3043, the audit team found that it contained no guidance for the use of the Deltek system for allowable expenses or for the use of the technical instructions posted on the Bellview website. In addition, the procedure contained an inaccurate reference to a baseline document. Because this issue does not involve a quality-affecting activity, it was documented as a Recommendation (see section 7.2).

No inappropriate purchases were identified by the audit team.

Quality Credit Card Purchases

There are currently five quality credit card (Q-Card) holders. The audit team verified that all were appointed by an approving official as required by WP 15-PC3044, Rev. 8, *Quality Credit Card Purchases*. The audit team verified the Q-Card holders' training records and qualification cards are current and satisfactorily completed. The team verified that each Q-Card holders' organization, single procurement dollar limit, and maximum credit limit are identified.

The audit team verified that all purchases made were for permissible items and were placed with approved suppliers selected from the Qualified Suppliers List (QSL). Documentation supporting Q-Card purchases referenced an appropriate inspection plan. The team verified that receipt inspections are performed by the Q-Card holders and that Q-Card holders maintain a log of all Q-Card purchases.

No deficiencies requiring a nonconformance report (NCR) were identified for any of the purchases reviewed.

No concerns were identified for the Q-Card purchase process.

Proposal, Competition, Identification, Selection, Evaluation and Award

The audit team selected two procurements for in-depth review: Magnesium Oxide, Subcontract (S/C) 414729, and Mine Ventilation Services, S/C 414232. The audit team verified that the final selections of the suppliers for these procurements were made in accordance with WP 15-PC3605, Rev. 4, *Proposal, Competition, Identification, Selection, Evaluation, and Award*. The audit team verified that each subcontract was evaluated by the appropriate organizations prior to placement and that the subcontracts were awarded to appropriate companies listed on the QSL.

No issues were identified by the audit team for the Proposal, Competition, Identification, Selection, Evaluation and Award process.

Preparation of Purchase Requisitions

The audit team selected several purchase requisitions (PRs) for evaluation to demonstrate compliance with WP 15-PC3609, Rev. 25, *Preparation of Purchase Requisitions*. Appropriate quality requirements were included in each of the PRs evaluated by the audit team. The team verified the appropriate quality level designator was identified on the PRs, and the suppliers were qualified in accordance with NWP procedures and were listed on the QSL. The following purchase requisitions were evaluated during the audit:

- PO#416641, Lightning Industries, 8/6/12
- PO#416251, 6-Ton Crane installation, 3/15/12
- PO#416496, Rate of Rise Leak Testing, 8/20/12
- PO#416591, Hall Machine, 8/6/12
- PO#501077, Air Liquide America, 11/12/12
- PO#501186, Hall Machine, 12/3/12
- PO#501581, Nitrogen, 3/21/13
- PO#A501002-5, ISM Safety Assessment, 12/26/12

The audit team verified that inspection requirements were identified for items received, the inspections were conducted, and the inspection-required blocks were checked on the PR. Further reviews confirmed that QA had approved each of the QL-1 and QL-2 PRs as required.

No issues were identified by the audit team for the Preparation of Purchase Requisitions process.

Overall, the audit team concluded that the Procurement Document Control processes were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

Criterion 5 – Instructions, Procedures, and Drawings

The audit team reviewed documentation to verify the program meets upper-tier requirements and the requirements of implementing procedure WP 10-WC3010, Rev. 20, *Maintenance PM/MWO Controlled Document Processing*.

The audit team conducted interviews with maintenance and engineering personnel to verify the adequacy of Preventative Maintenance (PM) and Model Work Order (MWO) process development, revision, review, approval, and cancellation.

The Lead Work Control Planner demonstrated the process for documenting PMs and MWOs in the Electronic Document Management System (EDMS). At the time of the audit there were 670 PMs and one MWO with active status in the EDMS. PMs are issued by the Work Group Manager via the Scheduler. Minor revisions to PMs determined during the performance of PM activities were found to be adequately processed and approved by the Work Group Manager.

The audit team identified one concern during this portion of the audit. The team reviewed 11 PM Controlled Document Deletion Requests (CDDRs) (WP 10-WC3010, Attachment 3), which were filed in the Trailer 950 Records Room. The following five of the 11 CDDRs reviewed did not have an Operations Liaison signature and date documenting that a Documented Safety Analysis/Technical Safety Requirement (DSA/TSR) impact review had been performed.

- PM411023, Revision 4
- PM411022, Revision 5
- PM411021, Revision 3
- PM411020, Revision 3
- PM411019, Revision 3

In addition, these CDDRs did not have the Work Group Manager's signature/date of approval, as required. All five of these CDDRs were reviewed and received organizational concurrence on April 9, 2013.

The team also noted that these CDDR forms were filled out by someone other than the Work Control Planner, which is a violation of WP 10-WC3010 (see section 6.1, CAR 13-031).

With the exception of the concern described above, the Instructions, Procedures, and Drawings processes evaluated were determined to be adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

Criterion 6 – Document Control

The audit team reviewed document control implementing documents, interviewed NWP document control personnel, and verified implementation activities, including the specific processes discussed below.

Procedure Writer's Guide

The audit team evaluated the use of the NWP WP15-PS.2, Rev. 9, *Procedure Writer's Guide*. The documents created using the guide were evaluated for format, step numbering, title format, and special markings such as "Continuous Use Procedure." No concerns were identified.

Document Distribution

The audit team reviewed the adequacy of procedure WP 15-PS3103, Rev. 16, *Document Distribution*. The team verified that NWP Document Services personnel at the WIPP appropriately transmit distribution sign-off sheets for new revisions of controlled documents to be placed in the operator handbooks (OHBs) located throughout the WIPP site. The team verified the location and the processing of new revisions of controlled copies placed into OHB #157, the facility operations handbook, and determined that responsible individuals entered the new revisions and destroyed the obsolete versions of controlled documents as required.

The team verified that responsible individuals signed the distribution sheets, returned them to the NWP Document Services manager within three working days, as required, and logged completion of the activity into the Commitment Tracking System (CTS). NWP personnel interviewed were aware that if the tasks are not answered by the responsible person within three days, the CTS is to notify the General Manager's office.

The team verified the contents of two records package files that had been confirmed as received in CTS. The contents of the first file, 12-HP1302, included the distribution sign-off sheet for a Canberra G641C file dated 10/30/2006. The other file, 12-HP1500 for Radiological Posting and Access Control, included the distribution sign-off sheets and was issued on 2/6/2013.

The team also found that verification checks are completed annually by the cognizant organizations. The last root cause analysis was performed in August 2011 and dealt with inaccuracies in document distribution. No concerns were identified during the review.

Controlled Document Processing

The audit team verified the electronic attachment (EA) processing, revision, review, and approval processes is in accordance with site procedures WP 15-PS3002, Rev. 29, *Controlled Document Processing*, and WP 15-PS3006, Rev. 6, *Processing NWP Forms and Electronic Attachments*. The audit team reviewed procedures WP 12-DS1329, Rev. 16, and WP 12-RL1054, Rev. 1, for WIPP TSRs. The TSR language was found to be embedded in the written requirements, such as in the steps requiring the shut-off of nitrogen valves and operation of the system at a minimum of 45 psi. Documents were verified to include the cognizant individual's verification of key steps, as required. New procedure WP 12-RL1030 was verified to include form 15-PS3002 Attachment 2, *Key*

Steps, as required. The team verified the completeness of review and revision documentation, including comments and resolutions, and the validation of documents by the cognizant manager.

The audit team verified that document files were appropriately stored in 1.5-hour, 1700 °F fire-rated, locked cabinets.

The audit team verified the completed interactive review process for 05-WH1011, Rev. 48. 15-PS3002 Attachment 4, *Interactive Review Documentation*, included redline/strikeout revisions for procedure 05-WH1011, and comment resolution. The team also verified interactive review of 05-WH1058, Rev. 12, *CH Waste Handling of Abnormal Operations*. Each of these documents included evidence of cognizant individual and cognizant manager review, utilizing Quality and Manufacturing Integrated System (Q&MIS), every two years. The audit team evaluated the Document Services RIDs dated January 2, 2013. All documentation generated was found to be appropriately covered by items #11 and #12 of the RIDs.

The audit team verified the use of electronic attachments EA12HP1100-14-0 and EA12HP1100-23-0. Both were appropriately approved and filed in fire-rated cabinets. Both reviews included proper cognizant individual reviews. The active EAs were reviewed in the Q&MIS as draft documents of procedure 12-HP1100-22-0. Proper disposal of superseded or cancelled documents was verified by the audit team.

The audit team determined that Document Control processes and procedures were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

Criterion 7 – Control of Purchased Items and Services

The audit team reviewed procurement document control implementing documents, interviewed NWP personnel, and verified implementation activities, including the specific processes discussed below. The established implementing documents and procedures were determined to adequately address CBFO QAPD requirements.

Contracts and Procurement Program

The audit team evaluated NWP management policy MP 1.34, Rev. 5, *WTS Contracts and Procurement Program*, and reviewed cognizant inspection (CI) personnel instructions CI No. 1010 and CI No. 1035 containing guidance for procurement activities. The audit team verified that the centralized master files are maintained and contain the Prime Contract (#DE-EM0001971), general correspondence, and formal technical direction memos. The audit team determined NWP maintains a DOE-approved system to control affiliate procurement actions and participates in the DOE Balanced Scorecard Self-Assessment Program.

Supplier Evaluation/Qualification

The audit team evaluated NWP procedure WP 13-QA3012, Rev. 20, *Supplier Evaluation/Qualification*. The team verified that the QSL is being maintained current by the QA QSL coordinator. The QSL database includes supplier name, status, QSL Request/Evaluation number, address, contact phone number, fax number, the product to be supplied, basis of the supplier's QA program, supplier QA program document title, revision number and date, basis for qualification, date of most recent auditor evaluation, qualification expiration date, and procurement restrictions/limitations imposed.

The QSL coordinator initiates the supplier's annual evaluation by monthly review of the QSL database for expiring qualifications. The audit team verified requalification desktop evaluation E12-03 of the HACH Company for evaluations of Carlsbad Environmental Monitoring and Research Center volatile organic compounds, and evaluation E13-02 of Canberra EFCOG, both of which are performed annually. The evaluations were found to be appropriately documented.

Stores Inventory Control

Using WP 15-PM3517, Rev. 25, *Stores Inventory Control*, the audit team evaluated the WIPP site Tool Crib. The audit team verified that the crib operates under the following procedures:

- WP 10-AD3015, Rev. 8, *Tool Crib Administration*
- WP 10-AD3016, Rev. 7, *Ladder Control*
- WP 10-AD3007, Rev. 7, *Use and Control of Rigging Components*
- WP10-AD3018, Rev. 4, *Use and Control of Personal Fall Arrest Systems*

The audit team verified the procedures are adequate and address the requirements of the QAPD. The biennial reviews of the stores Stock Requests are inventoried to identify missing parts, and orders are appropriately completed. Consumables are inventoried, hazardous material spare parts are dated to determine non-usage, and lists are appropriately maintained. The team found the cognizant engineers (CEs) aware of the inventory status and system inventory lists were forwarded to the CEs for review, with correspondence requiring completion within 90 days. Item lists are reviewed and maintained properly.

Overall, the audit team concluded that Control of Purchased Items and Services processes were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

Criteria 8 – Identification and Control of Items, and Criteria 9 – Control of Processes

The audit team evaluated those NWP QA program elements for implementing NQA-1, Criterion 8, Identification and Control of Items, and Criterion 9, Control of Processes. Because the Identification and Control of Items is a critical aspect of Control of Processes at the WIPP, Criteria 8 and 9 were evaluated simultaneously. The team reviewed procedures WP 10-5, Rev. 4, *WIPP Welding Guide*; WP 13QA-1001, Rev. 8, *Liquid Penetrant Examination*; WP 13QA-1002, Rev. 7, *Visual Inspection*; WP 13QA-1003, Rev. 25, *Quality Assurance Receipt/Source Inspection*; WP 13QA-1004, Rev. 7, *Magnetic Particle Examination*; WP 13QA-1006, Rev. 14, *Quality Assurance Plant Inspections*; WP 13QA-1007, Rev. 3, *Dimensional Inspection*; and WP 13QA.05, Rev. 10, *Suspect/Counterfeit Items Program*.

The team interviewed personnel in the Quality Assurance and Material Control organizations and examined associated documents and records. Evidence to verify implementation of requirements included examination of records for inspection/test documentation relative to dimensional inspections, visual inspections, liquid penetrant inspections, and magnetic particle inspection.

The review determined that the inspection/tests were performed in compliance with the associated procedures, and personnel adhered to the requirements for controlling processes and items. Evidence was examined to ensure compliance with the requirements for the identification, control and notification to the inspector general for suspect/counterfeit items (S/CIs) discovered during routine facility Condition Assessment Surveys and receipt inspection activities within the Material Control organization. Trend analysis reports were reviewed to verify compliance with the requirement to routinely analyze NCRs associated with S/CI. To ensure compliance with reporting requirements, the measuring and test equipment (M&TE) usage log maintained on the NWP QA homepage was examined, along with records verifying the monthly submittal of the M&TE usage log to the metrology organization.

Interviews were conducted with responsible personnel, which revealed there had been no code welding activities within the past 12 months. However, various non-code welding activities had been performed. Welding work orders were examined to verify compliance with requirements stipulated in WP 10-5. These welding work orders included repairs to bulk-head door brackets, bulk-head door hinges and waste station doors in the underground.

Training/qualification records for personnel performing special process activities such as nondestructive examination, welding, and S/CI inspections were examined to ensure personnel have completed the required training.

No CAQs were identified during the verification of the criteria for the identification and control of items and control of processes.

Overall, NWP processes for Identification and Control of Items, and Control of Processes were determined to be adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

6.0 SUMMARY OF DEFICIENCIES

6.1 Corrective Action Reports

During the audit, the audit team may identify CAQs and documents such conditions on CARs.

One CAR, described below, was initiated as a result of this audit. The CAR was transmitted to NWP under separate cover.

CBFO CAR 13-031

While reviewing 11 Attachment 3, Preventative Maintenance Controlled Document Deletion Request (CDDR) forms, it was noted that five of the 11 forms reviewed (and filed in the Trailer 950 Records Room as final records) did not have an Operations Liaison signature and date documenting that a DSA/TSR Impact Review had been performed, and did not have a Work Group Manager's signature/date of approval, as required by WP 10-WC3010, sections 1.6 and 2.6.7. This concern involved the following CDDR forms:

- PM411023, Revision 4
- PM411022, Revision 5
- PM411021, Revision 3
- PM411020, Revision 3
- PM411019, Revision 3

All five of these CDDR forms were reviewed and received organizational concurrence on 4/9/13.

Also, during the interview of NWP personnel it was discovered that the five CDDRs identified above had not been initiated by a Work Control Planner, as required in WP-10-WC3010, section 2.6.1.

6.2 Deficiencies Corrected During the Audit (CDAs)

Corrected During the Audit (CDA) – Isolated deficiencies that do not require a root cause determination or actions to preclude recurrence, and where correction of the deficiency can be verified prior to the end of the audit.

No isolated deficiencies were identified and corrected during this audit.

7.0 SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

During the audit, the audit team may identify conditions that warrant input by the audit team to the audited organization regarding potential problems or suggestions for program improvement.

7.1 Observations

During the interview portion of the audit, it was determined that not all of the personnel who have internet access have access to the OE/LL bulletins on Bellview; therefore, not all of the employees are able to select OE/LL topics that are relevant to their activities. It was noted that OE/LL is available on Bellview, but not all employees are able to select relevant topics and receive automatic notification when OE/LLs are posted, as stated in the Introduction of WP 15-PA.01, Revision 2, *Operating Experience/Lessons Learned*.

7.2 Recommendations

During the evaluation of WP 15-PC3043, the audit team determined that there was no guidance provided for the use of the Deltek system to generate an RFR for allowable costs, or for the technical instructions on use of the Deltek system posted on Bellview. Additionally, the Baseline Documents reference to the Accounting Manual in WP 15-PC3043 is inaccurate. As this area deals with the financial restitution of employee allowable expenses and is not connected with a quality-affecting activity at the WIPP site, the team recommends that WP 15-PC3043 be revised to provide a clear path for the performance of this process.

8.0 LIST OF ATTACHMENTS

- Attachment 1: Personnel Contacted During the Audit
- Attachment 2: NWP Implementing Procedures Evaluated

PERSONNEL CONTACTED DURING THE AUDIT				
NAME	ORGANIZATION/ DEPARTMENT	PREAUDIT MEETING	CONTACTED DURING AUDIT	POSTAUDIT MEETING
Allen, B.	NWP/QA	X	X	X
Allen, P.	NWP/Eng.		X	
Aragon, L.	NWP/Finance & Acct.		X	
Ater, E.	NWP/QA	X		X
Beeman, B.	NWP/Eng.		X	
Bradshaw, B.	NWP/QA		X	
Brooks, S.	NWP/ Maint. Ops.		X	
Cannon, V.	NWP/QA	X	X	X
Carrasco, R.	NWP/QA	X		
Cullum, B.	NWP/Eng.			X
Cullum, S.	NWP/BA		X	
Dickson, J.	NWP/Ops.		X	
Edwards, M.	NWP/Procurement Services		X	
Garcia, J.	NWP/Eng.		X	
Hasten, K.	NWP/ L&M Tech.	X	X	X
Hendrickson, M	NWP/PA	X		
Hernandez, L.	NWP/QA	X	X	
Hoff, J.	NWP/QA Manager	X	X	X
Howard, J.	NWP/Fac. Ops.		X	
Ito, F.	NWP	X	X	
Mashaw, J.	NWP/O & S		X	
Miehls, J.	NWP/Procurement		X	
Mireles, J.	NWP/QA	X		
Montejano, O.	NWP/Eng/Stoller		X	
Mullins, M.	NWP/QA	X	X	X
Nesser, C.	NWP/QA	X	X	X
Phillips, J.	NWP/Ops.		X	
Proctor, T.	NWP/QA			X
Redd, D.	NWP/QA		X	
Rhoades, R.	NWP/Ops.		X	

PERSONNEL CONTACTED DURING THE AUDIT				
NAME	ORGANIZATION/ DEPARTMENT	PREAUDIT MEETING	CONTACTED DURING AUDIT	POSTAUDIT MEETING
Ridenour, P.	NWP/Centralized Procurement/Packaging		X	
Sandate, Y.	NWP/Procurement		X	
Sanders, C.	NWP/QA	X	X	
Seifts, D.	NWP/Ops.		X	
Sexton, C.	NWP/Eng.		X	
Tanner, S.	NWP/QA	X		
Tidwell, S.	NWP/ Ops.		X	
Yates, C.	NWP/Doc. Services		X	

NWP Implementing Procedures Evaluated		
NQA Criteria	Doc. Number	Applicable NWP Document
1 – Organization		
	WP 13-QA.04	<i>Quality Assurance Department Administrative Program</i>
2 – Quality Assurance Program		
	WP 13-1	<i>Quality Assurance Program Description</i>
	WP 14-TR.01	<i>WIPP Training Program</i>
	WP 15-PA.01	<i>Operating Experience/Lessons Learned Program</i>
	WP 15-PA2000	<i>Lessons Learned Bulletin Development</i>
	WP 13-QA3006	<i>Data Analysis and Trending</i>
	WP 10-2	<i>Maintenance Operations Instruction Manual (maintenance trending analysis only)</i>
3 – Design Control		
	WP 09-CN3007	<i>Engineering and Design Document Preparation and Change Control</i>
	WP 09-CN3018	<i>Design Verification</i>
	WP 09-CN3021	<i>Component Indices</i>
	WP 09-CN3023	<i>Functional Classification Determination for Design</i>
	WP 09-CN3024	<i>Configuration Management Board/Engineering Change Proposal</i>
	WP 09-CN3031	<i>Engineering Calculations</i>
4 – Procurement Document Control		
	WP 15-PC3041	<i>Approval/Variation Request Processing</i>
	WP 15-PC3042	<i>Credit Card Purchases</i>
	WP 15-PC3043	<i>Request for Remittance</i>
	WP 15-PC3044	<i>Quality Credit Card Purchases</i>
	WP 15-PC3605	<i>Proposal, Competition, Identification, Selection, Evaluation, and Award</i>
	WP 15-PC3609	<i>Preparation of Purchase Requisitions</i>

NWP Implementing Procedures Evaluated		
NQA Criteria	Doc. Number	Applicable NWP Document
5 – Instructions, Procedures, and Drawings		
	WP 09-CN3007	<i>Engineering and Design Document Preparation and Change Control</i>
	WP 10-WC3010	<i>Maintenance PM/MWO Controlled Document Processing</i>
6 – Document Control		
	WP 15-PS.2	<i>Procedure Writer's Guide</i>
	WP 15-PS3002	<i>NWP Controlled Document Processing</i>
	WP 15-PS3006	<i>Processing NWP Forms and Electronic Attachments</i>
	WP 15-PS3103	<i>Document Distribution</i>
7 – Control of Purchased Items and Services		
	MP 1.34	<i>NWP Contracts and Procurement Program</i>
	WP 15-PM3517	<i>Stores Inventory Control</i>
	WP 13-QA3012	<i>Supplier Evaluation/Qualification</i>
8 – Identification and Control of Items, and 9 – Control of Processes		
	WP 10-5	<i>WIPP Welding Guide</i>
	WP 13-QA1001	<i>Liquid Penetrant Examination</i>
	WP 13-QA1002	<i>Visual Inspection</i>
	WP 13-QA1003	<i>Quality Assurance Receipt/Source Inspections</i>
	WP 13-QA1004	<i>Magnetic Particle Examination</i>
	WP 13-QA1006	<i>Quality Assurance Plant Inspections</i>
	WP 13-QA1007	<i>Dimensional Inspection</i>
	WP 13-QA.05	<i>Suspect/Counterfeit Items Program</i>