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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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JUL 29 2013

OFFICE OF
AIR AND RADIATION

Dennis Miehls and Martin Navarrete
Acting Quality Assurance Manager
Carlsbad Field Office
U.S. Department of Energy
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Carlsbad, NM 88221-3090

Dear Messrs. Miehls and Navarrete:

On June 18-20, 2013, the U.S. Environmental Protection Agency (EPA) conducted an audit of the Carlsbad Field Office (CBFO). The EPA audit team evaluated the CBFO quality assurance (QA) program relative to the requirements of American Society of Mechanical Engineers (ASME) Nuclear Quality Assurance (NQA) Standard NQA-1-1989, "Quality Assurance Program Requirements for Nuclear Facilities." Four of the 18 NQA-1 Elements were evaluated;

- Element 1, "Organization."
- Element 2, "Quality Assurance Program."
- Element 16, "Corrective Action."
- Element 17, "QA Records."

The EPA audit team reviewed documents and copies of records provided by CBFO, interviewed staff and determined that the CBFO QA program continues to comply with these NQA-1-1989 elements and continues to have sufficient independence, authority and resources to verify the quality of items and activities that are important to long-term isolation of transuranic (TRU) waste.

EPA did not identify any nonconformances in CBFO's QA program relative to the requirements of ASME NQA-1-1989. The EPA audit team identified some minor issues and generated two concerns not requiring responses and closed a previously opened concern that does not require a response.

1. EPA is concerned that the May 22, 2013, CBFO organization chart shows that the QA unit has a direct report line to the Office of the Manager which includes the deputy manager and secretary instead of directly reporting to only the Manager. EPA also noted that the QA organization block on the same organization chart identifies a "Quality Assurance Director" rather than "Quality Assurance Manager" as included in the CBFO QA Program Document (QAPD). It appears that this position is more commonly referred to as "Director" and EPA recommends that the CBFO QAPD be changed to include this nomenclature.
2. The QA department has been operating without a director since before the end of 2012. The interim arrangement of two senior QA Specialists rotating as acting director every two weeks appears to be addressing essential QA short-term needs, but EPA is concerned about the

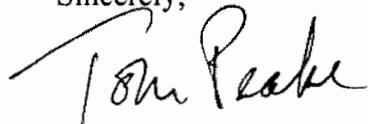


potential negative effect on long term effectiveness and efficiency of the existing QA personnel. CBFO anticipates resolving the staffing issue in the near future and EPA will monitor the resolution process and revisit this issue if employment of the QA director is significantly delayed.

3. From the March 14-17, 2011 QA audit, the EPA audit team found that MP 3.1, Revision 12, and Interim Change Notice No. 1 requires that Corrective Action Reports (CARs) be closed within 60 days of implementation. CAR Nos. 13-002 and 13-008 were both open for over 90 days. CBFO QA indicated that the procedure is scheduled for revision to remove the 60 day requirement. EPA will continue to monitor the timeliness of the CAR closure process.

If you have any questions regarding this QA audit report, please contact Lindsey Bender at (202) 343-9479 or bender.lindsey@epa.gov.

Sincerely,



Tom Peake, Director
Center for Waste Management and Regulations

Enclosure

cc: Electronic Distribution
Joe Franco, CBFO
Dennis Miehl, Acting Manager, CBFO QA
Martin Navarrete, Acting Manager, CBFO QA
Tim Hall, NMED
Raymond Lee, EPA HQ
Nick Stone, EPA Region6
Alton Harris, DOE HQ
Site Documents

DOCKET NO: A-98-49; II-A1-112

**EPA AUDIT OF THE CARLSBAD FIELD OFFICE QUALITY ASSURANCE
PROGRAM**

JUNE 18–20, 2013

**U. S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF RADIATION AND INDOOR AIR
CENTER FOR FEDERAL REGULATIONS
WASHINGTON, DC 20460**

JULY 2013

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Attachment H	NQA-1-1989 Element No. 17, <i>QA Records</i> , Checklist

ACRONYMS

ASME	American Society of Mechanical Engineers
CAR	corrective action report
CBFO	Carlsbad Field Office
CCP	Central Characterization Program
CFR	Code of Federal Regulations
CTAC	Carlsbad Field Office Technical Assistance Contractor
DC	Docket Center
DOE	U.S. Department of Energy
EM	Office of Environmental Management
EPA	U.S. Environmental Protection Agency
NQA	nuclear quality assurance
NTPC	National TRU Program Certification
NWP	Nuclear Waste Partnership, LLC
OQA	Office of Quality Assurance
QA	quality assurance
QAPD	Quality Assurance Program Document
RIDS	Records Inventory and Disposition Schedule
TRU	transuranic
WIPP	Waste Isolation Pilot Plant

1.0 EXECUTIVE SUMMARY

This report presents results of the U.S. Environmental Protection Agency (EPA) audit of the Department of Energy's (DOE's) Carlsbad Field Office (CBFO) quality assurance (QA) program conducted on June 18–20, 2013. The purpose of the audit was to verify implementation of CBFO's QA program relative to the requirements of American Society of Mechanical Engineers (ASME) Nuclear Quality Assurance (NQA) Standard NQA-1-1989,¹ "Quality Assurance Program Requirements for Nuclear Facilities." CBFO QA is responsible for ensuring that Waste Isolation Pilot Plant (WIPP) operations, including characterization of transuranic (TRU) wastes, are performed in compliance with the requirements of the NQA-1-1989 standard.

During this audit, EPA QA auditors evaluated the CBFO QA program against the NQA-1-1989 elements listed below to ensure compliance with EPA regulations at Title 40 of the Code of Federal Regulations (40 CFR) 194.22. The EPA audit team reviewed documents and records provided by CBFO and interviewed applicable CBFO personnel in Carlsbad, New Mexico.

- Element 1, "Organization."
- Element 2, "Quality Assurance Program."
- Element 16, "Corrective Action."
- Element 17, "QA Records."

Based on this audit, the EPA audit team determined that the CBFO QA program continues to comply with these NQA-1-1989 elements and continues to have sufficient independence, authority and resources to verify the quality of items and activities that are important to long-term isolation of TRU waste.

During the audit, the EPA audit team identified two concerns and closed an open concern. None of these concerns require a response.

1. EPA is concerned that the May 22, 2013, CBFO organization chart shows that the QA unit has a direct report line to the Office of the Manager which includes the deputy manager and secretary instead of directly reporting to only the Manager. EPA also noted that the QA organization block on the same organization chart identifies a "Quality Assurance Director" rather than "Quality Assurance Manager" as included in the CBFO QA Program Document (QAPD). It appears that this position is more commonly referred to as "Director" and EPA recommends that the CBFO QAPD be changed to include this nomenclature.
2. The QA department has been operating without a director since before the end of 2012. The interim arrangement of two senior QA Specialists rotating as acting director every two weeks appears to be addressing essential QA short-term needs, but EPA is concerned about the potential negative effect on long term effectiveness and efficiency of the existing QA personnel. CBFO anticipates resolving the staffing issue in the near future

¹ 40 CFR 194.22(a)(1) states that DOE's QA program shall comply with the requirements of the 1989 version of the ASME NQA-1 standard.

and EPA will monitor the resolution process and revisit this issue if employment of the QA director is significantly delayed.

3. MP 3.1, Revision 12, and Interim Change Notice No. 1 require that Corrective Action Reports (CARs) be closed within 60 days of implementation. CAR Nos. 13-002 and 13-008 were both open for over 90 days. CBFO QA indicated that the procedure is scheduled for revision to remove the 60 day requirement. EPA will continue to monitor the timeliness of the CAR closure process.

This report documents these audit activities. It will be made available to the public through EPA's Air Docket A-98-49, located at the Air and Radiation Docket in the EPA Docket Center, (EPA/DC) EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, DC, 20004.

2.0 BACKGROUND

2.1 Regulatory Background

In accordance with 40 CFR 194.22(a)(1), EPA requires the DOE to implement a QA plan that establishes the following NQA standards developed by ASME:

1. ASME NQA-1-1989.
2. ASME NQA-2a-1990 Addenda, Part 2.7, to ASME NQA-2-1989.
3. ASME NQA-3-1989 (excluding section 2.1(b) and (c) and section 17.1).

The regulation at 40 CFR 194.22(a)(2) requires DOE to implement its QA plan for all items and activities that are important to the long-term isolation of TRU waste within the Waste Isolation Pilot Plant (WIPP). The regulation at 40 CFR 194.22(e) provides EPA with the authority to conduct audits to verify the proper establishment and implementation of QA programs for the WIPP.

2.2 Organizational Background

CBFO is responsible for management of the WIPP. This responsibility includes oversight of the characterization of TRU waste bound for the WIPP and emplacement of the waste at the disposal site near Carlsbad, New Mexico. As stated in the QAPD, "The mission of the CBFO is to protect human health and the environment by operating the WIPP for safe disposal of TRU waste and by establishing an effective system for management of TRU waste from generation to disposal."

3.0 PURPOSE AND SCOPE

The purpose of this EPA audit was to verify that the CBFO QA program continues to properly implement selected elements of ASME NQA-1-1989. The scope of this EPA audit was limited to QA oversight of activities that are important to the long-term isolation of TRU waste as represented by documentation provided by CBFO.

4.0 DEFINITIONS

Finding: A determination that a requirement of the NQA standards has not been properly established or implemented. A finding requires a response.

Concern: A judgment that a finding may occur in the future and, depending on the magnitude of the issue, may or may not require a response.

Observation: The recognition and notation of a fact or occurrence that does not require a response.

Quality: The reliability of a specific item or activity that is important to the long-term isolation of TRU waste in the WIPP. "Quality achievement" is the responsibility of operational groups that directly produce such an item or perform such an activity. "Quality assurance/verification" is the responsibility of QA groups that do not produce such an item or perform such an activity.

5.0 EPA AUDIT TEAM MEMBERS

The audit team consisted of one EPA employee and three support contractors. Table 1 lists all members of the EPA audit team, along with each person's affiliation and function during this audit.

Table 1. EPA Quality Assurance Audit Team Members

Audit Team Member	Audit Responsibility	Affiliation
Lindsey Bender	EPA QA Audit Team Leader	EPA
Dorothy Gill	Lead QA Auditor	SC&A, Inc.
Patrick Kelly	QA Auditor	SC&A, Inc.
Kira Darlow	QA Auditor	SC&A, Inc.

Prior to this audit, Lindsey Bender (EPA) evaluated the qualifications of the SC&A auditors listed in Table 1. Ms. Bender found that the SC&A auditors were qualified based on their:

- Working knowledge and understanding of the NQA standards.
- Training.
- On-the-job training.

In addition, Ms. Bender evaluated the qualifications of Ms. Gill to be a Lead Auditor in oversight of DOE QA audits specific to Element 18 of NQA-1-1989 and found that she is qualified in this capacity based on her:

- Communication skills.
- Technical qualifications.
- Specific understanding of NQA-1, Element 18.

Table 2 lists all personnel who were interviewed or participated in this audit.

Table 2. Personnel Participating in Audit Meetings

Name	Affiliation and Title/Position	Entrance Meeting	Interview	Exit Meeting
Martin Navarrete	CBFO - Acting QA Director	✓	✓	✓
Dennis Miehl	CBFO - Senior QA Specialist	✓	✓	✓
Berry Pace	CTAC - QA Specialist	✓		✓
D. Randall Allen	CTAC - Audits & Assessments Manager	✓		✓
Jon E. Hoff	NWP - QA Manager	✓		✓
Val Cannon	NWP - Assurance Programs Manager	✓		✓
Alton Harris	DOE/EM - Observer	✓		✓
Tammy Reynolds	NWP - CCP Manager			✓
Shiela Pearcy	NTPC/Stoller - Records Manager			✓
Wayne Ledford	NWP - QA Specialist	✓		✓
Joe P. Harvill	CTAC - Senior Manager			✓
Farok Sharif	NWP - Project Manager			✓
Jose Franco	DOE/EM/CBFO - Manager			✓
Patti Crockett	CBFO - HR Liaison		✓	
Gayla White	CBFO - Records		✓	
Priscilla Hinojos	CBFO - Corrective Action Reports		✓	

6.0 PERFORMANCE OF THE AUDIT

The EPA audit team reviewed documents provided by CBFO and interviewed CBFO personnel to evaluate implementation of the requirements in ASME NQA-1-1989 for the elements listed below, using NQA-1-1989 checklists that are included as attachments to this report.

- Element 1, “Organization.”
- Element 2, “Quality Assurance Program.”
- Element 16, “Corrective Action.”
- Element 17, “QA Records.”

The EPA audit team focused on the personnel issues within the CBFO QA department. The QA department has been without a manager/director since the end of 2012 and the two Senior QA Specialists returned from a detail in February of this year. These two Specialists each discharge the QA manager/director duties on a two week rotation in addition to their own assigned duties in accordance with their positions. EPA was concerned regarding adequate coverage and discharge of all the QA duties and responsibilities in the QA department given the reduced staffing level. The EPA audit team assessed the continued effectiveness of the department by reviewing documents and records and interviewing QA personnel. The EPA audit team identified some minor issues and generated two concerns not requiring responses and closed a previously opened concern that does not require a response.

Concern No. CBFO-QA-2013-01C is based on the CBFO organization chart dated May 22, 2013 (see Attachments A and B). This organization chart shows that the QA unit has a direct reporting line to the Office of the Manager, which includes the deputy manager and the secretary. EPA recommends revising the organization chart so that this reporting line only includes the Manager.

The QA organization block on the same organization chart identifies a "Quality Assurance Director" rather than a "Quality Assurance Manager" as included in the CBFO QAPD. EPA recommends that the CBFO QAPD be changed to refer to the position as "Director," as this appears to be the more common term. EPA requests that CBFO consider making the suggested changes to increase clarity and consistency in the department's documentation.

Concern No. CBFO-QA-2013-02C regards the open CBFO QA Director position (see Attachment C). The CBFO QA department has been operating without a director since before the end of 2012. The interim arrangement implemented by CBFO was to alternate the two Senior QA Specialists into the director's position on a two week cycle. This arrangement appears to work well but EPA is concerned about the potential negative effect on long term effectiveness and efficiency of the existing QA personnel. Mr. Joe Franco (Manager, Office of the Manager) addressed some of EPA's concerns. Mr. Franco assured EPA that an individual had been identified to fill the QA director position, although this may not be a permanent assignment. The plan is for this individual to stay until a permanent solution can be found for the staff shortage. The two Senior QA Specialists will continue to perform the director duties in the near term until the temporary QA director arrives. EPA will monitor the resolution process and revisit this issue if employment of the QA director is significantly delayed.

During the EPA audit of CBFO's QA program in March 14–17, 2011, the EPA audit team identified a concern that the implementing procedure MP 3.1 did not properly establish the requirement for corrective action to be *identified and corrected as soon as practical*, as is required in NQA-1-1989 Element 16, "Corrective Action" (see EPA Docket No. A-98-49; II-A1-110). During the current audit (June 2013), EPA reviewed MP 3.1, Revision 12, and Interim Change Notice No. 1 and found that the procedure had been revised to require that all Corrective Action Reports (CARs) be closed within 60 days of implementation. This revision satisfies the NQA-1-1989 requirement. EPA closed this concern and no further action is required by CBFO. However, during the June 2013 audit, the EPA audit team identified two CARs that had both been open for over 90 days. CBFO QA indicated that MP 3.1 is scheduled for revision to remove the 60-day requirement. EPA wrote Concern No. CBFO-QA-2013-03C and will continue to monitor the timeliness of the CAR closure process (see Attachment D).

The EPA audit team also determined that the QA records process and procedures continue to be effectively implemented. This determination was made by interviewing records personnel and reviewing recently generated records.

The EPA audit team performed a document review for the requirements of NQA-1-1989 Elements 1, 2, 16 and 17 and gathered objective evidence to support the proper implementation of these requirements throughout the audit as time allowed. The completed NQA-1-1989 checklists are included as attachments to this report.

EPA determined that the CBFO QA program continues to comply with these NQA-1-1989 elements and continues to have sufficient independence, authority and resources to verify the quality of items and activities that are important to long-term isolation of TRU waste.

6.0 FINDINGS, CONCERNS AND OBSERVATIONS

The EPA audit team did not identify any findings or observations relative to the NQA-1-1989 elements discussed above. The EPA audit team identified two concerns requiring responses. These concerns are discussed in section 5.0 above. The EPA audit team also closed one open concern from the March 2011 audit as discussed in section 5.0 above. These three concerns and are included as attachments to this report. There are no open issues as a result of this audit.

7.0 CONCLUSIONS

The EPA audit team reviewed documentation and interviewed personnel to determine the continued compliance of the CBFO QA program with ASME NQA-1-1989. Based on the sample of documentation and elements reviewed during this audit, EPA determines that CBFO continues to comply with the standard.

8.0 REFERENCES

A-13-11, Audit Report of Audit A-13-11

CAR Trend Report for May 2013

CBFO approval of CCP-PO-001, Revision 21

CBFO approval of CCP-PO-002, Revision 27

CBFO approval of CCP-QP-001, Revision 8, draft A

CBFO Assessment Schedule, June 2013

CBFO CAR 13-002, Listing of Selected CARs, printed June 20, 2013

CBFO CAR 13-008, Listing of Selected CARs, printed June 20, 2013

CBFO CAR 13-016, Listing of Selected CARs, printed June 20, 2013

CBFO Organization Chart, May 22, 2013

CTAC activity report for fiscal year 2013

Designation email for Acting Director for the CBFO Office of Quality Assurance, June 14, 2013

Lead Auditor Maintenance of Proficiency Record, April 24, 2013

List of CBFO CARs initiated June 1, 2012–June 11, 2013, printed June 11, 2013

Memorandum approving extension for CBFO CAR 13-016, May 22, 2013

Memorandum closing CAR 13-002, March 6, 2013

MP 10.3, Audits, U.S. Department of Energy Carlsbad Field Office, CBFO MP 10.3, Revision 7, December 30, 2010

MP 3.1, Corrective Action Reports, U.S. Department of Energy Carlsbad Field Office, CBFO MP 3.1, Revision 12, October 28, 2011

MP 4.5, Generating, Receiving, Storing, and Controlling Active CBFO Program Records, U.S. Department of Energy Carlsbad Field Office, CBFO MP 4.5, Revision 5, January 23, 2012

MP 4.6, Records Filing, Inventorying, Scheduling, and Dispositioning, U.S. Department of Energy Carlsbad Field Office, CBFO MP 4.6, Revision 6, January 28, 2013

MP 4.7, Disposal of Nonpermanent Records, U.S. Department of Energy Carlsbad Field Office, CBFO MP 4.7, Revision 5, January 28, 2013

MP 4.8, Records Transfer and Retrieval, U.S. Department of Energy Carlsbad Field Office, CBFO MP 4.8, Revision 5, January 28, 2013

MP 4.9, Quality Assurance Records, U.S. Department of Energy Carlsbad Field Office, CBFO MP 4.9, Revision 5, January 28, 2013

NQA-1-1989, Quality Assurance Program Requirements for Nuclear Facilities, American Society of Mechanical Engineers, ASME NQA-1-1989 ed., Revision of ANSI/ASME NQA-1-1986 ed., September 15, 1989

QAPD, Quality Assurance Program Document, U.S. Department of Energy Carlsbad Field Office, DOE/CBFO-94-1012, Revision 11, June 30, 2010

Recertification request from the Office of the National TRU Program, April 30, 2013

Technical Specialist qualification record, May 14, 2013

TP 10.1, Qualification of Audit Personnel and Certification of Lead Auditors, U.S. Department of Energy Carlsbad Field Office, CBFO TP 10.1, Revision 5, May 27, 2007

WP 08-PT3006, Quality Lists and Quality Category Assessments, Revision 3, June 11, 2013

ATTACHMENT A

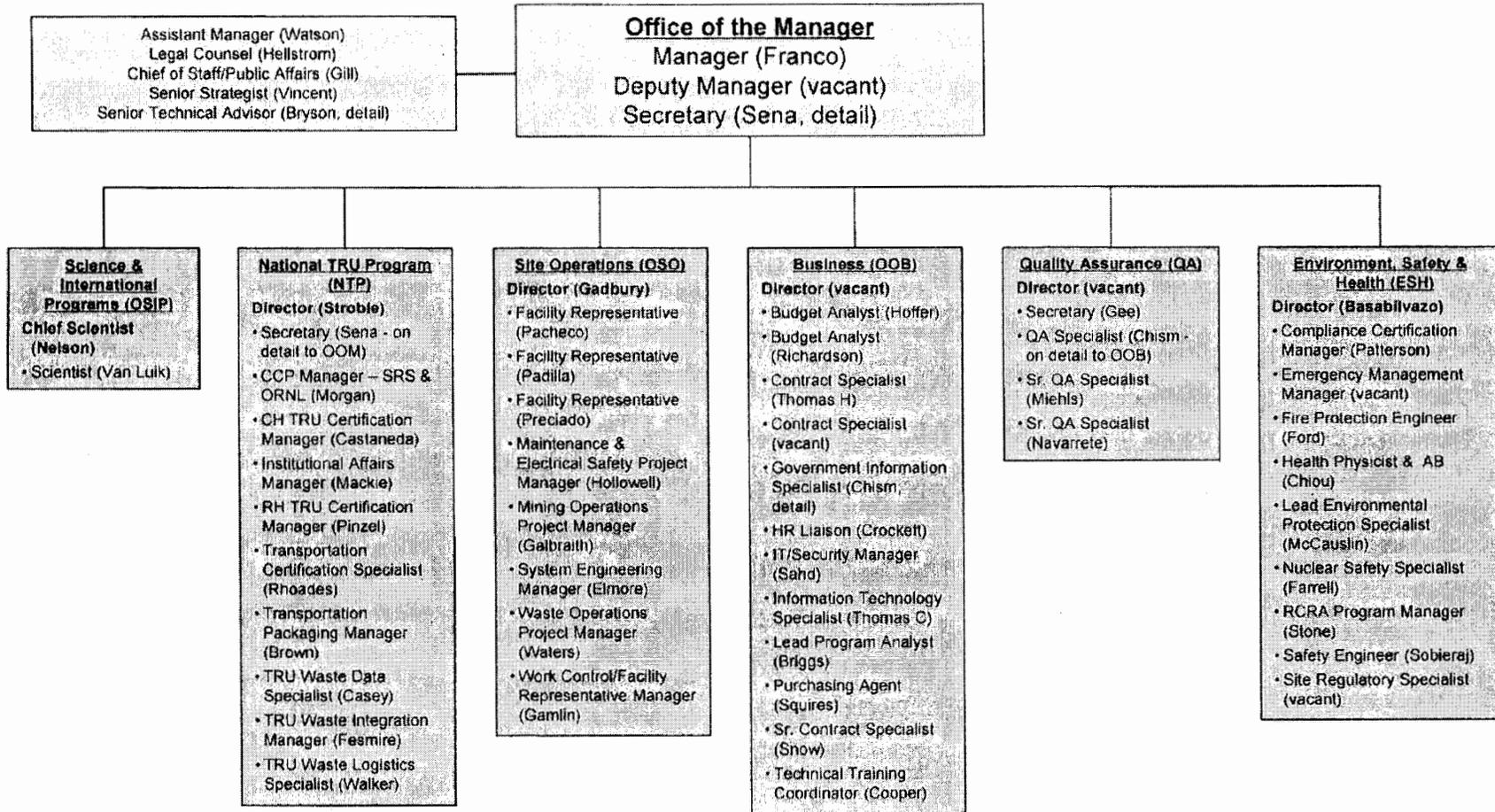
EPA INSPECTION ISSUE TRACKING FORM, ISSUE NO. CBFO-QA-2013-01C, FINAL

Inspection No. CBFO-NWP-QA-2013-1	Issue Number: CBFO-QA-2013-01C Date: June 19, 2013
Inspector: D. Gill, L. Bender Attachments? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Sample Size: NA Population size (if known): NA
<p>A. Description of Issue: 1) The May 22, 2013 organization chart for the Carlsbad Field Office shows that the quality assurance unit has a direct report line to the Office of the Manager which includes the deputy manager and secretary. EPA recommends revising the organization chart so that this reporting line only include the Manager.</p> <p>2) The Quality Assurance organization block on the above organization chart identifies a "Quality Assurance Director" rather than "Quality Assurance Manager" as included in the CBFO QAPD. It appears that this position is more commonly referred to as "Director" and EPA recommends that the CBFO QAPD is changed to include this nomenclature.</p> <p>EPA requests that CBFO consider making the suggested changes to increase clarity and consistency in the department's documentation.</p>	
<p>B. Regulatory Reference: 40 CFR 194.22(e)</p>	
<p>C. Discussed with: Joe Franco, Dennis Miehls, Martin Navarrete</p>	
<p>D. Additional Comments:</p>	
<p>E. Site Response Information:</p> <p>Site Response Required? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Site Response Due Date:</p>	

ATTACHMENT B

CARLSBAD FIELD OFFICE ORGANIZATION CHART, MAY 22, 2013

Carlsbad Field Office



05/22/2013

ATTACHMENT C

EPA INSPECTION ISSUE TRACKING FORM, ISSUE NO. CBFO-QA-2013-02C, FINAL

Inspection No. CBFO-NWP-QA-2013-1	Issue Number: CBFO-QA-2013-02C Date: June 20, 2013
Inspector: D. Gill, L. Bender Attachments? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Sample Size: NA Population size (if known): NA
<p>A. Description of Issue: The QA department has been operating without a manager/director since before the end of 2012. The interim arrangement implemented by CBFO was to alternate the two Senior Quality Assurance Specialists into the manager/director's position on a two week cycle. This arrangement appears to work well but EPA is concerned about the potential negative effect on long term effectiveness and efficiency of the existing QA personnel.</p> <p>EPA's discussion with Mr. Joe Franco (Manager, Office of the Manager) obviated some of EPA's concerns because CBFO anticipates resolving the staffing issue in the near future. EPA will monitor the resolution process and revisit this issue if employment of the QA manager/director is significantly delayed.</p>	
B. Regulatory Reference: 40 CFR 194.22(e)	
C. Discussed with: Joe Franco, Dennis Miehl, Martin Navarrete	
D. Additional Comments: None	
<p>E. Site Response Information:</p> <p>Site Response Required? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Site Response Due Date:</p>	

ATTACHMENT D

EPA INSPECTION ISSUE TRACKING FORM, ISSUE NO. CBFO-QA-2013-03C, FINAL

Inspection No. CBFO-NWP-QA-2013-1	Issue Number: CBFO-QA-2013-03C Date: June 20, 2013
Inspector: K. Darlow Attachments? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Sample Size: NA Population size (if known): NA
A. Description of Issue: MP 3.1, Revision 12, and Interim Change Notice No. 1 require that Corrective Action Reports (CARs) be closed within 60 days of implementation. CAR Nos. 13-002 and 13-008 were both open for over 90 days. CBFO QA indicated that the procedure is scheduled for revision to remove the 60 day requirement. EPA will continue to monitor the timeliness of the CAR closure process.	
B. Regulatory Reference: 40 CFR 194.22(e)	
C. Discussed with: Dennis Miehl, Martin Navarrete	
D. Additional Comments:	
E. Site Response Information: Site Response Required? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Site Response Due Date:	

ATTACHMENT E: ASME NQA-1-1989 CHECKLIST

NQA-1 ELEMENT: No. 1 with Supplement 1S-1, Organization

EPA AUDITORS: L. Bender, D. Gill, P. Kelly, K. Darlow

DATE: June 18-20, 2013

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
<u>Basic Requirements</u>		
<p>1. Are the organizational structure, functional responsibilities, levels of authority and lines of communication documented for activities affecting quality?</p>	Y	<p><i>At present the CBFO QA department does not have a QA Director. The director's duties are currently by two Senior QA Specialists on a two week rotational cycle. The department's QA Specialist is currently on detail and so the QA department is working at 60% of staffing specified in the latest organization chart. The EPA inspectors reviewed performance of the QA Director's duties through recently generated records and did not identify any formal concerns requiring a response or finding. The Manager of the Office of the Manager informed EPA that steps were being taken to fill the QA Director position and an individual had already been identified. It appears that this individual will be on detail but will remain in the position until a permanent appointment is made.</i></p> <p>QAPD, Revision 11, section 1.1, Organization and Quality Assurance Program; section 1.1.1.4, Communication and Interface Responsibilities, paragraph A; Appendix C, CBFO Organization, Responsibilities, and Interfaces; Appendix D, CBFO Quality Assurance Manager Responsibilities; Appendix E, TRU Waste Characterization and Certification Organizational and Individual Responsibilities. CBFO Organization Chart. Audit report A-13-11. Technical Specialist Qualification record. Lead Auditor Maintenance of Proficiency Record. WP 08-PT3006, Revision 3, Quality Lists and Quality Category Assessments. CBFO Approval of CCP-PO-001, Revision 21. CBFO approval of CCP-PO-002, Revision 27. CBFO approval of CCP-QP-001, Revision 8, draft A. DOE CBFO-94-1012, Draft Revision 12-A, page 11. CAR Trend Report for May 2013. Recertification request from the Office of the National TRU Program. Designation email for Acting Director for the CBFO OQA. CTAC activity report for fiscal year 2013. Memorandum closing CAR 13-002. CBFO MP 3.1, Revision 12, Corrective Action Reports.</p>

<p>2. Do persons or organizations responsible for performing quality assurance functions have sufficient authority, access to work areas and organizational freedom to:</p> <ul style="list-style-type: none"> • Identify quality problems? • Initiate, recommend, or provide solutions to quality problems through designated channels? • Verify implementation of solutions? • Assure that further processing, delivery, installation or use is controlled until proper disposition of a nonconformance, deficiency or unsatisfactory condition has occurred? 	<p>Y</p>	<p><i>The two Senior QA Specialists performing the QA Director's duties are experienced and dedicated QA professionals. However, the extra duties they are required to perform have the potential to adversely affect their performance over time. EPA encourages CBFO to fill the two vacant QA positions as soon as possible to ensure the long-term efficient and effective functioning of the QA department. EPA generated a Concern not requiring a response to address this issue (CBFO-QA-2013-02C).</i></p> <p>QAPD, Revision 11, section 1.1.1.3, QA Management, paragraphs A and B; Appendix D, CBFO Quality Assurance Manager Responsibilities.</p> <p>List of CBFO CARs. CAR Trend Report for May 2013. Memorandum closing CAR 13-002. CBFO Assessment Schedule. CBFO Organization Chart.</p>
<p>3. Do persons or organizations responsible for performing quality assurance functions have direct access to responsible management at a level where appropriate action can be effected?</p>	<p>Y</p>	<p><i>CBFO organization chart shows the QA unit with a direct report line to the Office of the Manager which includes deputy manager and secretary. EPA generated a concern not requiring a response, Concern No. CBFO-QA-2013-01C, to address these issues.</i></p> <p>QAPD, Revision 11, section 1.1.1.3, QA Management, paragraph A.7; Appendix C, CBFO Organization, Responsibilities, and Interfaces.</p> <p>CBFO Organization Chart. Position descriptions for Senior QA Specialist and Director.</p>
<p>4. Do persons or organizations responsible for performing quality assurance functions report to a management level that provides the required authority and organizational freedom, including sufficient independence from cost and schedule considerations?</p>	<p>Y</p>	<p><i>The QA organization reports to the Manager of the Office of the Manager (see Concern No. CBFO-QA-2013-01C above).</i></p> <p>QAPD, Revision 11, section 1.1.1.3, QA Management, paragraphs A.7–10 and B.</p> <p>CBFO Organization Chart. Position descriptions for Senior QA Specialist and Director.</p>
<p><u>Supplementary Requirements (1S-1)</u></p>		
<p>1. Are the organizational structure and the responsibility assignments such that:</p> <ul style="list-style-type: none"> • Quality is achieved and maintained by those who have been assigned responsibility for performing work? • Quality achievement is verified by persons or organizations not directly responsible for performing the work? 	<p>Y</p>	<p><i>The CBFO QA department has been established and functioned appropriately for many years. Although recent personnel changes have had the potential to negatively impact its level of effective functioning, the department has nonetheless achieved all required goals and ensured that all QA requirements have been met. CBFO management has identified an individual to take the QA Director's position but this may be not a permanent appointment. CBFO management made verbal assurances to EPA that the staffing situation would be resolved in the near future to ensure adequate and continuous QA oversight of the CBFO functions related to the WIPPP repository.</i></p> <p>QAPD, Revision 11, section 1.1.1, Organization; section 1.1.1.2, Employees; section 1.1.1.3, QA Management; Appendix D, CBFO Quality Assurance Manager Responsibilities.</p> <p>CBFO Organization Chart.</p>

<p>2. Do the individuals or organizations responsible for establishing and executing a quality assurance program delegate any or all of the work to others, and, if so, do the individuals or organizations retain responsibility for the quality assurance program?</p>	<p>Y</p>	<p><i>CTAC is CBFO's QA contractor for, amongst other duties, performing annual audits of waste generator sites. This program has been in place for many years and its performance does not appear to have been negatively impacted by CBFO QA's staffing issues.</i></p> <p>QAPD, Revision 11, section 1.1.1.5, Delegation of Work. Audit report A-13-11. Technical Specialist Qualification record. Lead Auditor Maintenance of Proficiency Record. CBFO Assessment Schedule.</p>
<p>3. Is responsibility for the control of further processing, delivery, installation or operation of nonconforming items designated in writing?</p>	<p>Y</p>	<p><i>CBFO's QAPD requirements, including control of nonconforming work and corrective action are implemented by waste generator sites. CBFO QA retains oversight and final closure authority for these issues. EPA reviewed these processes to ensure that nonconforming items and CARs were being processed as required and found that CARs were not being closed in the time specified by the procedure. EPA generated a concern not requiring a response, Concern No. CBFO-QA-2013-03C, to address this issue.</i></p> <p>QAPD, Revision 11, section 1.1.1.3, QA Management, paragraph B.4; section 1.3.2.1, Documenting and Evaluating Nonconforming Items, paragraph E. CAR Trend Report for May 2013. Recertification request from the Office of the National TRU Program. Designation email for Acting Director for the CBFO OQA. CTAC activity report for fiscal year 2013. Memorandum closing CAR 13-002. CBFO MP 3.1, Revision 12, Corrective Action Reports. CBFO CARs 13-002, 13-008, 13-016. Memorandum approving extension for CBFO CAR 13-016. List of CBFO CARs initiated June 1, 2012–June 11, 2013.</p>
<p>4. Where more than one organization is involved in the execution of quality assurance activities, is the responsibility and authority of each organization clearly established and documented?</p>	<p>Y</p>	<p>QAPD, Revision 11, section 1.1.1.4, Communication and Interface Responsibilities, paragraph B; Appendix C, CBFO Organization, Responsibilities, and Interfaces. CBFO Organization Chart.</p>
<p>5. Are the external interfaces between organizations, as well as the internal interfaces between organizational units, documented? Are interface responsibilities defined and documented?</p>	<p>Y</p>	<p>QAPD, Revision 11, section 1.1.1.4, Communication and Interface Responsibilities, paragraph B; Appendix C, CBFO Organization, Responsibilities, and Interfaces. CBFO Organization Chart.</p>

*Y: The referenced documents adequately define, describe, address or satisfy the NQA-1-1989 requirement.

N: The referenced documents do not adequately define, describe, address or satisfy the NQA-1-1989 requirement.

I: EPA requires additional information to determine if the referenced documents adequately define, describe, address or satisfy the NQA-1-1989 requirement.

N/A: The specific NQA-1-1989 requirement is not applicable to the subject QA program.

ATTACHMENT F: ASME NQA-1-1989 CHECKLIST

NQA-1 ELEMENT: No. 2 with Supplements 2S-1, 2S-2, 2S-3 and 2S-4, Quality Assurance Program

EPA AUDITORS: L. Bender, D. Gill, P. Kelly, K. Darlow

DATE: June 18-20, 2013

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
<u>Basic Requirements</u>		
1. Is a documented quality assurance program planned, implemented and maintained in accordance with NQA-1?	Y	<i>The CBFO QA program is well established and documented. Implementation is verified by both CBFO and EPA on a recurring basis.</i> QAPD, Revision 11, section 1.1.2.1, Quality Assurance Program Documents.
2. Does the quality assurance program identify the activities and items to which it applies?	Y	QAPD, Revision 11, section 1.1.2.2, Applicability of QAPD Requirements.
3. Does the quality assurance program provide control over activities affecting quality to an extent consistent with their importance?	Y	<i>The CBFO QA program has been reviewed and audited by EPA on many previous occasions. The controls in place are adequate and ensure that all quality affecting activities and processes are implemented and verified as required.</i> QAPD, Revision 11, section 1.1.2.3, Grading Items and Activities and Applying Management Controls.
4. Was the quality assurance program established at the earliest time consistent with the schedule for accomplishing the activities?	Y	<i>The CBFO QA program has been reviewed and audited by EPA on many previous occasions. The controls in place are adequate and ensure that all quality affecting activities and processes are implemented and verified as required.</i> QAPD, Revision 11, section 1.1.2.3, Grading Items and Activities and Applying Management Controls.
5. Does the quality assurance program provide for the planning and accomplishment of activities affecting quality under suitably controlled conditions, which include the use of appropriate equipment, suitable environmental conditions for accomplishing the activity and assurance that prerequisites for the given activity have been satisfied?	Y	<i>CBFO's QA program has been subject to scrutiny since it implemented by many organizations. The QAPD has been revised as necessary due in response to both internal or external drivers and requirements. EPA has reviewed and audited by EPA on many previous occasions.</i> QAPD, Revision 11, section 1.1.2.4, Planning Work, paragraphs E and G.
6. Does the quality assurance program provide for any special controls, processes, test equipment, tools and skills to attain the required quality and for verification of quality?	Y	QAPD, Revision 11, section 1.1.2.4, Planning Work.
7. Does the quality assurance program provide for indoctrination and training of personnel performing activities affecting quality?	Y	QAPD, Revision 11, section 1.2.2, Training Requirements, paragraph A. TP 10.1, Revision 5, section 5.0, Procedure.
8. Does the management of the organizations implementing the quality assurance program regularly assess the adequacy of that part of the program for which they are responsible and assure its effective implementation?	Y	QAPD, Revision 11, section 1.1.1.3, QA Management.

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
Supplementary Requirements (2S-1)		
1. Does the responsible organization designate those activities that require qualified inspection and test personnel and minimum requirements for such personnel?	Y	<p><i>CBFO continues to require qualified personnel and retains records to support that qualification.</i></p> <p>QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph A.</p> <p>Audit report A-13-11.</p> <p>Technical Specialist Qualification record.</p> <p>Lead Auditor Maintenance of Proficiency Record.</p> <p>Recertification request from the Office of the National TRU Program.</p> <p>Designation email for Acting Director for the CBFO OQA.</p> <p>CTAC activity report for fiscal year 2013.</p> <p>Memorandum closing CAR 13-002.</p>
2. Has the responsible organization established written procedures for the qualification of inspection and test personnel to assure that only qualified personnel are permitted to perform inspection and test activities?	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph A.
3. Do personnel selected for performing inspection and test activities have the experience or training commensurate with the scope, complexity or special nature of the activities?	Y	QAPD, Revision 11, section 1.2.1, Qualification Requirements, paragraph A; section 2.4.1, Qualification of Inspection and Test Personnel, paragraph C.
4. Have provisions been made for the indoctrination of personnel regarding the technical objectives and requirements of the applicable codes and standards and the quality assurance program elements that are to be employed?	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph D.
5. Has the need for a formal training program been determined? Are training activities, including on-the-job training, conducted to qualify personnel who perform inspections and tests?	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph E.
6. Are the capabilities of a candidate for certification initially determined by a suitable evaluation of the candidate's education, experience, training and either test results or capability demonstration?	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph F.
7. Is the job performance of inspection and test personnel reevaluated at periodic intervals not to exceed three years?	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph G.

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
8. If it is determined at any time that the capabilities of an individual are not in accordance with the qualification requirements specified for the job, is that person removed from that activity until such time as the required capability has been demonstrated?	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph G.
9. Is a person reevaluated for a required inspection or test capability if activities have not been performed in his or her qualified area for a period of one year?	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph G.
10. Is the qualification of personnel certified in writing in an appropriate form, including: <ul style="list-style-type: none"> • Employer's name? • Identification of person being certified? • Activities certified to perform? • Basis used for certification, including: <ul style="list-style-type: none"> – Education, experience, indoctrination and training? – Test results, where applicable? – Results of capability demonstration? • Results of periodic evaluation? • Results of physical examinations, when required? • Signature of employer's designated representative who is responsible for such certification? • Date of certification and date of certification expiration? 	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph H. Audit report A-13-11. Technical Specialist Qualification record. Lead Auditor Maintenance of Proficiency Record.
11. Has the responsible organization identified any special physical characteristics needed in the performance of each activity, including the need for initial and subsequent physical examination?	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph I.
12. Does the employer establish and maintain records of personnel qualification?	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraph J.
<u>Supplementary Requirements (2S-2)</u>		
1. Does the quality assurance program provide for the qualification of nondestructive examination personnel to the American Society of Nondestructive Testing Recommended Practice No. SNT-TC-1A, issued June 1980?	Y	CBFO QAPD, Revision 11, section 2.4.2, Qualification of Nondestructive Examination Personnel, paragraph A.
2. Has the responsible organization established written procedures for the control and administration of nondestructive examination personnel training, examination and certification?	Y	QAPD, Revision 11, section 2.4.2, Qualification of Nondestructive Examination Personnel, paragraph B.

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
3. Does the employer establish and maintain records of personnel qualification?	Y	QAPD, Revision 11, section 2.4.2, Qualification of Nondestructive Examination Personnel, paragraph C.
<u>Supplementary Requirements (2S-3)</u>		
1. Has the responsible auditing organization established the qualifications for audit personnel and the requirements for the use of technical specialists to accomplish the auditing of quality assurance programs?	Y	QAPD, Revision 11, section 3.2.2.4, Auditor Qualification. TP 10.1, Revision 5, section 5.1, Technical Specialist Qualification; section 5.2, Auditor Qualification; section 5.3, Lead Auditor Qualification and Certification; Attachment I, CBFO Guide for Technical Specialists; Attachment III, Auditor Qualifications Documentation; Attachment IV, Example of Record of Lead Auditor Qualification and Certification.
2. Is the competence of audit personnel developed by one or more of the following methods: <ul style="list-style-type: none"> • Orientation to provide a working knowledge and understanding of NQA-1 and the auditing organization's procedures for implementing audits and reporting results? • Training programs to provide general and specialized training in audit performance? • On-the-job training, guidance and counseling under the direct supervision of a lead auditor? 	Y	QAPD, Revision 11, section 3.2.2.4, Auditor Qualification, paragraphs A-C. TP 10.1, Revision 5, section 5.2, Auditor Qualification, section 5.2.1; Attachment III, Auditor Qualifications Documentation; Attachment IV, Example of Record of Lead Auditor Qualification and Certification.
3. Does a prospective lead auditor have the capability to communicate effectively, both in writing and orally? Has the lead auditor's employer attested to these skills in writing?	Y	QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph B, Lead Auditor Communication Skills. TP 10.1, Revision 5, Attachment IV, Example of Record of Lead Auditor Qualification and Certification.

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
<p>4. Are prospective lead auditors trained, as necessary, to assure their competence in auditing skills, including training in the following areas:</p> <ul style="list-style-type: none"> • Knowledge and understanding of NQA-1 and other nuclear-related codes, standards, regulations and regulatory guides? • General structure of quality assurance programs as a whole and applicable elements as defined by NQA-1? • Auditing techniques of examining, questioning, evaluating and reporting; methods of identifying and following up on corrective action items; and closing out audit findings? • Audit planning in the quality-related functions for the following activities: design, purchasing, fabrication, handling, shipping, storage, cleaning, erection, installation, inspection, testing, statistics, nondestructive examination, maintenance, repair, operation, modification of nuclear facilities or associated components, and safety aspects of the nuclear facility? • On-the-job training to include applicable elements of the audit program? 	Y	<p>QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph C, Lead Auditor Training.</p> <p>TP 10.1, Revision 5, section 5.3, Lead Auditor Qualification and Certification; section 5.5, External Lead Auditor Certification; Attachment III, Auditor Qualifications Documentation; Attachment IV, Example of Record of Lead Auditor Qualification and Certification.</p>
<p>5. Is a prospective lead auditor required to have participated in a minimum of five quality assurance audits within a period of time not to exceed three years prior to the date of qualification, one audit of which shall be a nuclear quality assurance audit within one year prior to qualification?</p>	Y	<p>QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph A.2, Experience.</p> <p>TP 10.1, Revision 5, Attachment IV, Example of Record of Lead Auditor Qualification and Certification; section 5.3, Lead Auditor Qualification and Certification, section 5.3.3.</p>
<p>6. Is a prospective lead auditor required to pass an examination that evaluates his or her comprehension of and ability to apply the body of knowledge identified under the training requirements (listed under question 4 above)?</p>	Y	<p>QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph D, Lead Auditor Examination.</p> <p>TP 10.1, Revision 5, section 5.3, Lead Auditor Qualification and Certification, section 5.3.4.</p>
<p>7. Do lead auditors maintain their proficiency through one or more of the following:</p> <ul style="list-style-type: none"> • Regular and active participation in the audit process? • Review and study of codes, standards, procedures, instructions and other documents related to quality assurance program and program auditing? • Participation in training programs? 	Y	<p>QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph F, Lead Auditor Proficiency Maintenance.</p> <p>TP 10.1, Revision 5, Attachment 5, Lead Auditor Maintenance of Proficiency Record; section 5.4, Lead Auditor Annual Certification Evaluation.</p>

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
8. Does management conduct documented annual assessments of lead auditors to extend their qualification, require retraining or require requalification?	Y	QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph F, Lead Auditor Proficiency Maintenance. TP 10.1, Revision 5, Attachment 5, Lead Auditor Maintenance of Proficiency Record; section 5.4, Lead Auditor Annual Certification Evaluation, section 5.4.1.
9. Are lead auditors who fail to maintain their proficiency for a period of two years or more required to requalify?	Y	QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph F, Lead Auditor Proficiency Maintenance. TP 10.1, Revision 5, section 5.4, Lead Auditor Annual Certification Evaluation, section 5.4.3.
10. Is the employer responsible for training auditors?	Y	QAPD, Revision 11, section 1.1.1.1, Management, paragraph C.1. TP 10.1, Revision 5, section 4.2, CBFO QA Manager, section 4.2.1.
11. Does the responsible auditing organization select and assign personnel who are independent of any direct responsibility for performance of the activities that they will audit?	Y	QAPD, Revision 11, section 3.2.2.3, Audit Team Selection, paragraph A. MP 10.3, Revision 7, section 4.5, Audit Team Leader, section 4.5.2.
12. Does the lead auditor, prior to commencing the audit, concur that assigned audit personnel collectively have experience or training commensurate with the scope, complexity or special nature of the activities to be audited?	Y	QAPD, Revision 11, section 3.2.2.3, Audit Team Selection, paragraph C. TP 10.1, Revision 5, section 4.0, Responsibility; section 4.3, Lead Auditors. MP 10.3, Revision 7, section 4.5, Audit Team Leader, section 4.5.2.
13. Is the employer responsible for the development and administration of the examination for a lead auditor? If the employer delegates this activity to an independent certifying agency, does the employer retain responsibility for the conformance of the examination and its administration to the NQA-1-1989 standard?	Y	QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph D, Lead Auditor Examination. TP 10.1, Revision 5, section 4.0, Responsibility; section 4.2, CBFO QA Manager, section 4.2.3; section 5.3, Lead Auditor Qualification and Certification, section 5.3.4.
14. Does the employer establish and maintain records of personnel qualifications for auditors and lead auditors performing audits?	Y	QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph D, Lead Auditor Examination. TP 10.1, Revision 5, section 6.0, Records.
15. Does the employer certify each lead auditor as being qualified to lead audits, including documentation of the following by the certification: <ul style="list-style-type: none"> • Employer's name? • Lead auditor's name? • Date of certification or recertification? • Basis of qualification (i.e., education, experience, communication skills, training, examination, etc.)? • Signature of employer's designated representative who is responsible for such certification? 	Y	QAPD, Revision 11, section 3.2.2.6, Lead Auditor Qualification, paragraph E, Lead Auditor Certification. TP 10.1, Revision 5, Attachment IV, Example of Record of Lead Auditor Qualification and Certification; Attachment III, Auditor Qualifications Documentation.

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
16. Are the records for each lead auditor maintained and updated annually?	Y	TP 10.1, Revision 5, section 5.4, Lead Auditor Annual Certification Evaluation, section 5.4.2; Attachment V, Lead Auditor Maintenance of Proficiency Record.
Supplementary Requirements (2S-4)		
1. Are personnel identified for indoctrination or training?	Y	QAPD, Revision 11, section 1.2.2, Training Requirements, paragraph A; section 2.4.1, Qualification of Inspection and Test Personnel, paragraph C.
2. Is the extent of indoctrination and training commensurate with the following: <ul style="list-style-type: none"> • The scope, complexity and nature of the activity? • The education, experience and proficiency of the person? 	Y	QAPD, Revision 11, section 2.4.1, Qualification of Inspection and Test Personnel, paragraphs C and F.
3. Are personnel indoctrinated in the following subjects as they relate to a particular function: <ul style="list-style-type: none"> • General criteria, including applicable codes, standards and company procedures? • Applicable quality assurance program elements? • Job responsibilities and authority? 	Y	QAPD, Revision 11, section 1.2.2, Training Requirements, paragraphs A and B; section 2.4.1, Qualification of Inspection and Test Personnel, paragraph C.
4. Is training provided, if needed, to: <ul style="list-style-type: none"> • Achieve initial proficiency? • Maintain proficiency? • Adapt to changes in technology, methods or job responsibilities? 	Y	QAPD, Revision 11, section 1.2.2, Training Requirements, paragraph A.
5. Do records of the implementation of indoctrination and training take the form of: <ul style="list-style-type: none"> • Attendance sheets? • Training logs? • Personnel training records? 	Y	QAPD, Revision 11, section 1.2.2, Training Requirements, paragraph C.

*Y: The referenced documents adequately define, describe, address or satisfy the NQA-1-1989 requirement.

N: The referenced documents do not adequately define, describe, address or satisfy the NQA-1-1989 requirement.

I: EPA requires additional information to determine if the referenced documents adequately define, describe, address or satisfy the NQA-1-1989 requirement.

N/A: The specific NQA-1-1989 requirement is not applicable to the subject QA program.

ATTACHMENT G: ASME NQA-1-1989 CHECKLIST

NQA-1 ELEMENT: No. 16, Corrective Action

EPA AUDITORS: L. Bender, D. Gill, P. Kelly, K. Darlow

DATE: June 18–20, 2013

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
Basic Requirements		
1. Are conditions adverse to quality identified promptly and corrected as soon as practical?	Y	QAPD, Revision 11, section 1.3.3.3, Conditions Adverse to Quality, paragraph B; section 1.3.3.7, Corrective Action Follow-up; section 1.3.3.9, Quality Trending, paragraph B. MP 3.1, Revision 12, Corrective Action Reports, Attachments I–IV.
2. In the case of a significant condition adverse to quality, is the cause of the condition determined and corrective action taken to preclude recurrence?	Y	QAPD, Revision 11, section 1.3.3.4, Significant Conditions Adverse to Quality; section 1.3.3.5, Corrective Action Planning, paragraphs C and D. MP 3.1, Revision 12, section 5.3, Corrective Action Plan; section 5.4, Corrective Action Plan Evaluation; Attachments I–IV.
3. Are the identification, cause and corrective action for significant conditions adverse to quality documented and reported to appropriate levels of management?	Y	QAPD, Revision 11, section 1.3.3.4, Significant Conditions Adverse to Quality, paragraph B. MP 3.1, Revision 12, section 5.1, Corrective Action Report Initiation: CBFO QA Director; section 5.2, CAR Issuance: CBFO QA Director; section 5.9, Evaluation of Impact for CARS Requiring Accelerated Corrective Action.
4. Is follow-up action taken to verify implementation of corrective action?	Y	QAPD, Revision 11, section 1.3.3.7, Corrective Action Follow-up. MP 3.1, Revision 12, Corrective Action Reports, section 5.6.1, paragraph A.
Supplementary Requirement – None		

*Y: The referenced documents adequately define, describe, address or satisfy the NQA-1-1989 requirement.

N: The referenced documents do not adequately define, describe, address or satisfy the NQA-1-1989 requirement.

I: EPA requires additional information to determine if the referenced documents adequately define, describe, address or satisfy the NQA-1-1989 requirement.

N/A: The specific NQA-1-1989 requirement is not applicable to the subject QA program.

ATTACHMENT H: ASME NQA-1-1989 CHECKLIST

NQA-1 ELEMENT: No. 17 with Supplement 17S-1, *QA Records*

EPA AUDITORS: L. Bender, D. Gill, P. Kelly, K. Darlow

DATE: June 18-20, 2013

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
Basic Requirements		
1. Are records that furnish documentary evidence of quality specified, prepared and maintained?	Y	<p><i>EPA auditors interviewed the records custodian to review QA record handling processes.</i></p> <p>QAPD, Revision 11, section 1.5, Records, paragraph A.</p> <p>MP 4.5, Revision 5, Generating, Receiving, Storing, and Controlling Active CBFO Program Records.</p> <p>MP 4.9, Revision 5, section 5.1, Identification of Active CBFO Quality Assurance Records, section 5.1.1; section 5.2, Generation of CBFO Quality Assurance Records, section 5.2.1; section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records.</p>
2. Are quality assurance records legible, identifiable and retrievable?	Y	<p><i>EPA has reviewed many CBFO records during the present and past audits. All records reviewed were legible, identifiable and retrievable.</i></p> <p><i>The EPA inspectors interviewed personnel responsible for managing general QA records and specifically CAR records. Records such as management assessments, audits and surveillances and CARs are all stored in locked, fire-rated cabinets. Access to records is restricted to identified personnel and removal of records from the storage areas is recorded.</i></p> <p>QAPD, Revision 11, section 1.5.2, Generating QA Records, paragraph B; section 1.5.3, Indexing QA Records, paragraphs B and C.</p> <p>MP 4.5, Revision 5, section 5.1, Identification of Active CBFO Quality Assurance Records, section 5.1.1; section 5.3, Corrections, section 5.3.1.</p> <p>MP 4.6, Revision 6, section 5.3.1, General Requirements for the Development and Implementation of RIDS, paragraph B.</p>
3. Are quality assurance records protected against damage, deterioration or loss?	Y	<p><i>Records are stored in a secure and locked facility in locked fire-rated cabinets.</i></p> <p>QAPD, Revision 11, section 1.5.6, Storage, Preservation, Safekeeping, and Disposition of QA Records, paragraph A.</p> <p>MP 4.5, Revision 5, section 5.3.1, General Requirements for the Development and Implementation of RIDS.</p> <p>MP 4.9, Revision 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records., section 5.4.7.</p>

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
4. Are the requirements and responsibilities established and documented for the transmittal, distribution, retention, maintenance and disposition of quality assurance records?	Y	QAPD, Revision 11, section 1.5.3: Indexing QA Records; section 1.5.5, Receiving QA Records; section 1.5.6, Storage, Preservation, Safekeeping, and Disposition of QA Records. MP 4.5, Revision 5, Generating, Receiving, Storing, and Controlling Active CBFO Program Records. MP 4.6, Revision 6, Records Filing, Inventorying, Scheduling, and Dispositioning. MP 4.7, Revision 5, Disposal of Nonpermanent Records. MP 4.8, Revision 5, Records Transfer and Retrieval.
<u>Supplementary Requirements (17S-1)</u>		
1. Has a quality assurance records system been established?	Y	<i>EPA has previously audited CBFO record keeping practices and processes and determined them to be adequate and effective. CBFO was able to provide all requested records to EPA prior to and during the audit.</i> QAPD, Revision 11, section 1.5.1, Document Changes, paragraph A. MP 4.5, Revision 5, Generating, Receiving, Storing, and Controlling Active CBFO Program Records. MP 4.6, Revision 6, Records Filing, Inventorying, Scheduling, and Dispositioning. MP 4.7, Revision 5, Disposal of Nonpermanent Records. MP 4.8, Revision 5, Records Transfer and Retrieval. MP 4.9, Revision 5, Quality Assurance Records. CBFO Organization Chart. Audit report A-13-11. Technical Specialist Qualification record. Lead Auditor Maintenance of Proficiency Record. CAR Trend Report for May 2013. Recertification request from the Office of the National TRU Program. Designation email for Acting Director for the CBFO OQA. CTAC activity report for fiscal year 2013. Memorandum closing CAR 13-002.

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
<p>2. Is the quality assurance records system defined, implemented and enforced in accordance with written procedures, instructions or other documentation?</p>	<p>Y</p>	<p><i>EPA has previously audited CBFO record keeping practices and processes and determined them to be adequate and effective. CBFO was able to provide all requested records to EPA prior to and during the audit.</i></p> <p>QAPD, Revision 11, section 1.5.1, Document Changes, paragraph A. MP 4.5, Revision 5, Generating, Receiving, Storing, and Controlling Active CBFO Program Records. MP 4.6, Revision 6, Records Filing, Inventorying, Scheduling, and Dispositioning. MP 4.7, Revision 5, Disposal of Nonpermanent Records. MP 4.8, Revision 5, Records Transfer and Retrieval. MP 4.9, Revision 5, Quality Assurance Records. Example records listed in 17S-1 No. 1 above.</p>
<p>3. Do the applicable design specifications, procurement documents, test procedures, operational procedures or other documents specify the quality assurance records to be generated, supplied or maintained by the facility?</p>	<p>Y</p>	<p><i>Procedures contain a records section that specifies what records are kept for each activity. EPA has previously audited CBFO record keeping practices and processes and determined them to be adequate and effective. CBFO was able to provide all requested records to EPA prior to and during the audit.</i></p> <p>QAPD, Revision 11, section 1.5.2, Generating QA Records, paragraph A. MP 4.9, Revision 5, section 5.1, Identification of Active CBFO Quality Assurance Records, section 5.1.1. TP 10.1, Revision 5, section 6.0, Records. Example records listed in 17S-1 No. 1 above.</p>
<p>4. Are quality assurance records required to be legible, accurate and complete?</p>	<p>Y</p>	<p><i>CBFO was able to provide all requested records to EPA prior to and during the audit. All records were legible, accurate and complete.</i></p> <p>QAPD, Revision 11, section 1.5.2, Generating QA Records, paragraph B. MP 4.5, Revision 5, section 5.1, Identification of Active CBFO Quality Assurance Records, section 5.1.1. Example records listed in 17S-1 No. 1 above.</p>
<p>5. Are documents considered to be valid quality assurance records only if stamped, initialed or signed and dated by authorized personnel, or otherwise authenticated?</p>	<p>Y</p>	<p><i>CBFO was able to provide all requested records to EPA prior to and during the audit. All records were legible, accurate and complete.</i></p> <p>QAPD, Revision 11, section 1.5.2, Generating QA Records, paragraph D. MP 4.9, Revision 5, section 5.2, Generation of CBFO Quality Assurance Records, section 5.2.2. Example records listed in 17S-1 No. 1 above.</p>

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
6. Are the quality assurance records indexed? Does the indexing system include record retention times and the location of the record within the quality assurance record system?	Y	<p><i>Retention times are specified in procedures. At the time of the audit, no QA records had been permanently dispositioned regardless of the required retention times.</i></p> <p>QAPD, Revision 11, section 1.5.3, Indexing QA Records. MP 4.5, Revision. 5, section 5.3, Storage and Control of Active Records, section 5.3.1, paragraph C. MP 4.6, Revision 6, section 3.2.17, records Inventory and Disposition Schedule. MP 4.9, Revision 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records, section 5.4.3; section 5.4.4.</p>
7. Are quality assurance records distributed, handled and controlled in accordance with written procedures?	Y	<p><i>The CBFO procedures are well written, complete and mature. Records are retrievable and all records requested by EPA were provided for review.</i></p> <p>QAPD, Revision 11, section 1.5.2, Generating QA Records, paragraph C; section 1.5.6, Storage, Preservation, Safekeeping, and Disposition of QA Records, paragraph A. MP 4.5, Revision 5, Generating, Receiving, Storing, and Controlling Active CBFO Program Records. MP 4.6, Revision 6, Records Filing, Inventorying, Scheduling, and Dispositioning. MP 4.8, Revision 5, Records Transfer and Retrieval. MP 4.9, Revision 5, Quality Assurance Records. Example records listed in 17S-1 No. 1 above.</p>
8. Do quality assurance records provide sufficient information to permit identification between the record and the items or activities to which it applies?	Y	<p><i>EPA's review of records demonstrated that they contained sufficient information to be traceable back to the activity, process or procedure for which they were generated. Records are retrievable and all records requested by EPA were provided for review.</i></p> <p>QAPD, Revision 11, section 1.5.3, Indexing QA Records, paragraph C. MP 4.6, Revision 6, section 5.1, General Requirements for the Uniform File Code, section 5.1.1; section 5.1.2; Attachment III, Instructions for Filling Out the Records Inventory and Disposition Schedule. Example records listed in 17S-1 No. 1 above.</p>
9. Are quality assurance records classified as either lifetime or nonpermanent?	Y	<p>QAPD, Revision 11, section 1.5.4, Classifying QA Records, paragraph A. MP 4.9, Revision 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records, section 5.4.4.</p>

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
10. Is the retention time for nonpermanent quality assurance records established in writing?	Y	<p><i>Record retention times are specified in the QAPD and associated implementing procedures.</i></p> <p>QAPD, Revision 11, section 1.5.4, Classifying QA Records, paragraph D. MP 4.6, Revision 6, Attachment III, Instructions for Filling Out the Records Inventory and Disposition Schedule. MP 4.7, Revision 5, section 5.1, General Requirements for Records Disposal, section 5.1.1.</p>
11. Are quality assurance records corrected in accordance with procedures that provide for appropriate review or approval by the originating organization? Does the correction include the date and the identification of the person authorized to issue such correction?	Y	<p><i>EPA's review of records prior to and during the audit demonstrated that records are corrected, when necessary, in accordance with procedure requirements.</i></p> <p>QAPD, Revision 11, section 1.5.7, Correcting Information in QA Records. MP 4.9, Revision 5, section 5.3, Corrections, section 5.3.1; section 5.3.2.</p>
12. Does the individual or organization responsible for receiving quality assurance records provide protection from damage or loss during the time that the records are in their possession?	Y	<p><i>Records are stored in locked and secured facilities and fire-rated cabinets if required.</i></p> <p>QAPD, Revision 11, section 1.5.5, Receiving QA Records. MP 4.5, Revision 5, section 5.1, General Requirements for the Generation, Receipt, Storage, and Control of CBFO Records, section 5.1.3.</p>
13. Does each organization responsible for the receipt of quality assurance records designate a person or organization responsible for receiving the records?	Y	<p>QAPD, Revision 11, section 1.5.5, Receiving QA Records.</p>
14. Does the receipt control system include: <ul style="list-style-type: none"> • A method for designating the required records? • A method for identifying records received? • Procedures for receipt and inspection of incoming records? • A method for submittal of completed records to the storage facility? 	Y	<p><i>Identification of records may be by audit number, date or other tracking number as necessary. All records requested by the EPA inspectors were made available for review by CBFO.</i></p> <p>QAPD, Revision 11, section 1.5.5, Receiving QA Records. Example records listed in 17S-1 No. 1 above.</p>
15. Is the receipt control system structured to permit a current and accurate assessment of the status of quality assurance records during the receiving process?	Y	<p>QAPD, Revision 11, section 1.5.5, Receiving QA Records.</p>

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
<p>16. Prior to storage of quality assurance records, was a written storage procedure prepared and responsibility assigned for enforcing its requirements? Does the storage procedure include each of the following:</p> <ul style="list-style-type: none"> • A description of the storage facility? • The filing system to be used? • A method for verifying that the records received are in agreement with the transmittal document and that the records are legible? • A method of verifying that the records are those designated (see No. 14 above)? • The rules governing access to and control of the files? • A method for maintaining control of and accountability for records removed from the storage facility? • A method for filing supplemental information and disposing of superseded records (see No. 11 above)? 	Y	QAPD, Revision 11, section 1.5.6, Storage, Preservation, Safekeeping, and Disposition of Records, paragraph A.
<p>17. Are quality assurance records stored in a manner approved by the organizations responsible for storage, including the following:</p> <ul style="list-style-type: none"> • Provisions in the storage arrangements to prevent damage from moisture, temperature and pressure? • Records firmly attached in binders or placed in folders or envelopes for storage in steel file cabinets or on shelving in containers? • Provisions for special processed records (such as radiographs, photographs, negatives and microfilm) to prevent damage from excessive light, stacking, electromagnetic fields and temperature? 	Y	<p><i>Records are stored in locked and secured facilities and fire-rated cabinets if required.</i></p> <p>QAPD, Revision 11, section 1.5.6, Storage, Preservation, Safekeeping, and Disposition of Records.</p> <p>MP 4.8, Revision 5, section 5.2, Preparation of Records for Transfer, section 5.2.4.</p> <p>MP 4.9, Revision 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records, section 5.4.7.</p>
<p>18. Have measures been established to preclude the entry of unauthorized personnel into the storage area?</p>	Y	<p><i>Access to records is restricted to authorized personnel and by the use of keypad entry and locks.</i></p> <p>QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph J.</p> <p>MP 4.9, Revision 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records, section 5.4.2.</p>
<p>19. Have measures been taken to provide for replacement, restoration or substitution of lost or damaged records?</p>	Y	<p><i>Procedures exist to address this issue but the processes have not been used to-date.</i></p> <p>QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph K.</p> <p>MP 4.8, Revision 5, section 5.2, Preparation of Records for Transfer, section 5.2.4.</p>

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
<p>20. Are records stored in a facility that minimizes the risk of damage or destruction from the following:</p> <ul style="list-style-type: none"> • Natural disasters such as winds, floods or fires? • Environmental conditions such as high and low temperatures and humidity? • Infestation of insects, mold or rodents? 	Y	<p>QAPD, Revision 11, section 1.5.6, Storage, Preservation, Safekeeping, and Disposition of Records. MP 4.9, Revision 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records, section 5.4.7.</p>
<p>21. Are quality assurance records stored in either single or dual storage facilities?</p>	Y	<p><i>Single storage is used.</i> QAPD, Revision 11, section 1.5, Records. MP 4.9, Revision. 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records, section 5.4.1.</p>
<p>22. Does the design and construction of a single record storage facility meet all of the following criteria:</p> <ul style="list-style-type: none"> • Reinforced concrete, concrete block, masonry or equal construction? • Floor and roof with drainage control (if a floor drain is provided, a check valve (or equal) is included)? • Doors, structure and frames, and hardware designed to comply with the requirements of a minimum 2-hour fire rating? • Sealant applied over walls as a moisture or condensation barrier? • Surface sealant on the floor providing a hard-wear surface to minimize concrete dusting? • Foundation sealant and provisions for drainage? • Forced air circulation with filter system? • Fire protection system? • Only those penetrations used exclusively for fire protection, communication, lighting or temperature/humidity control are allowed (all penetrations are sealed or dampered to comply with the minimum 2-hour fire protection rating)? <p><u>Note:</u> The design and construction of a single record storage facility must meet either the criteria listed in No. 22 or one of the three criteria listed in No. 23.</p>	Y	<p><i>Design, control and maintenance of the storage facility is delegated to NWP, a CBFO contractor.</i> QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph E.</p>

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
<p>23. Does the design and construction of a single record storage facility meet one of the following criteria:</p> <ul style="list-style-type: none"> • 2-hour fire rated vault meeting National Fire Protection Association (NFPA) 232-1986 or NFPA 232AM-1986 or both? • 2-hour fire rated Class B file containers meeting the requirements of NFPA 232-1986 or NFPA 232AM-1986 or both? • 2-hour fire rated file room meeting the requirements of NFPA 232-1986 or NFPA 232AM-1986 or both, with the following provisions: <ul style="list-style-type: none"> – Early warning fire detection and automatic fire suppression capability with electronic supervision at a constantly attended central station? – Records storage in fully-enclosed metal cabinets? – Adequate access and aisle ways? – Prohibition in the room of work not directly associated with record storage or retrieval? – Prohibition in the room of smoking, eating or drinking? – 2-hour fire rated dampers or doors in all boundary penetrations? <p><u>Note:</u> The design and construction of a single record storage facility must meet either the criteria listed in No. 22 or one of the three criteria listed in No. 23.</p>	Y	<p><i>Design, control and maintenance of the storage facility is delegated to NWP, a CBFO contractor.</i></p> <p>QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph G.</p>
<p>24. Were the construction details of the quality assurance records storage facility reviewed for adequacy of protection of contents by a person who is competent in the technical field of fire protection and fire extinguishing?</p>	Y	<p><i>Design, control and maintenance of the storage facility is delegated to NWP, a CBFO contractor.</i></p> <p>QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph F.</p>
<p>25. When temporary storage of quality assurance records is required by an organization's procedures, are the records stored in a 1-hour fire rated container? Do these procedures specify the maximum allowable time limit for temporary storage? Does the container bear a UL label (or equivalent) certifying 1-hour fire protection, or is it certified by a person competent in the technical field of fire protection?</p>	Y	<p>QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph I. MP 4.9, Revision 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records, section 5.4.1; section 5.4.6; section 5.4.8.</p>
<p>26. If storage at dual facilities for each quality assurance record is provided, are the facilities at locations sufficiently remote from each other to eliminate the chance of exposure to a simultaneous hazard? Although dual storage facilities are not required to satisfy the requirements of a single storage facility, are all other requirements of this standard met?</p>	N/A	<p><i>CBFO uses single storage for records.</i></p> <p>QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph H. MP 4.9, Revision 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records, section 5.4.1.</p>

Does the reference document adequately define, describe, address or satisfy the following:	Y, N, I, N/A*	Applicable Procedure and Paragraph; Additional Objective Evidence
27. Does the storage system provide for retrieval of information in accordance with planned retrieval times, based on the record type?	Y	<p><i>All records requested by the EPA inspectors were made available for review by CBFO.</i></p> <p>QAPD, Revision 11, section 1.5.3, Indexing QA Records, paragraph B.</p> <p>MP 4.8, Revision 5, section 5.5, Retrieval of Records from the Mail and Records Center or the WIPP Records Archive, section 5.5.1.</p> <p>Example records listed in 17S-1 No. 1 above.</p>
28. Is a list maintained designating those personnel who shall have access to quality assurance files?	Y	<p><i>EPA reviewed lists of authorized personnel during the on-site audit. Lists were visible and up-to-date. Personnel interviewed were aware of the purpose and use of the lists.</i></p> <p>QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph J.</p> <p>MP 4.9, Revision 5, section 5.4, Storage, Maintenance, and Protection of Quality Assurance Records, section 5.4.2.</p>
29. Are records maintained by a supplier at its facility or other location accessible to the purchaser or its designated alternate (e.g., the owner)?	Y	QAPD, Revision 11, section 2.3.4, Procurement Document Requirements, paragraph C.
30. Are records accumulated at various locations, prior to transfer, made accessible to the owner directly or through the procuring organization?	Y	QAPD, Revision 11, section 2.3.4, Procurement Document Requirements, paragraph C.
31. Does the custodian of quality assurance records inventory the submittals, acknowledge receipt, and process these records in accordance with NQA-1?	Y	<p>QAPD, Revision 11, section 1.5.6, Storage, Preservation, Safekeeping, and Disposition of Records, paragraph A; section 1.5.5, Receiving QA Records.</p> <p>MP 4.8, Revision 5, section 5.4, Transfer Records, section 5.4.6.</p>
32. Are the records storage and maintenance requirements of regulatory agencies followed in determining final disposition of quality assurance records?	Y	<p>QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph L.</p> <p>MP 4.9, Revision 5, section 5.5, Disposal of Quality Assurance Records, section 5.5.2.</p>
<p>33. Are the supplier's nonpermanent records disposed of only if the applicable conditions listed below are satisfied:</p> <ul style="list-style-type: none"> • Items are released for shipment, a Code Data Report is signed or a Code Symbol Stamp is affixed? • Regulatory requirements are satisfied? • Operational status permits? • Warranty consideration is satisfied? • Purchaser's requirements are satisfied? 	Y	QAPD, Revision 11, section 1.5.6.1, Records Disposition, paragraph L.

*Y: The referenced documents adequately define, describe, address or satisfy the NQA-1-1989 requirement.

N: The referenced documents do not adequately define, describe, address or satisfy the NQA-1-1989 requirement.

I: EPA requires additional information to determine if the referenced documents adequately define, describe, address or satisfy the NQA-1-1989 requirement.

N/A: The specific NQA-1-1989 requirement is not applicable to the subject QA program.