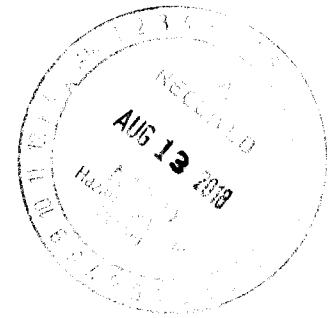




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
AUG 13 2018



Ms. Mary McDaniel, Manager
Quality and Contractor Assurance
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Carlsbad Field Office Report for Audit A-18-22, NWP QA Program NQA-1 Criteria 1 through 9

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) performed Audit A-18-22 of the Nuclear Waste Partnership LLC (NWP) Quality Assurance (QA) Program related to Criteria 1 through 9 of the Quality Assurance Program Requirements for Nuclear Facilities (ASME NQA-1, 1989 Edition), and the corresponding sections of the CBFO Quality Assurance Program Document (QAPD) on June 12 - 14, 2018. The audit team concluded that the NWP QA Program continues to adequately address the upper-tier requirements of the CBFO Quality Assurance Program Document; the implementation of NWP procedures continues to be satisfactory; and procedure implementation results in an effective program overall.

As described in the enclosed report, the audit team identified four concerns resulting in one Observation, one Recommendation, and two Corrective Action Reports.

If you have any questions concerning the audit report, please contact me at (575) 234-7483.

Sincerely,

Martin Navarrete (handwritten signature)

Martin Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

- J. Carswell, CBFO *ED
D. Gadbury, CBFO ED
D. Miehl, CBFO ED
S. Stapleton, CBFO ED
E. Garza, CBFO ED
R. Elmore, CBFO ED
B. Covert, NWP ED
J. Britain, NWP ED
D. Huddleston, NWP ED
S. Turner, NWP ED
C. Tyler, NWP ED
V. Ballew, NWP ED
S. Saiz, NWP ED
A. Boyea, NWP ED
J. Walsh, EPA ED
J. Ellis, EPA ED
T. Peake, EPA ED
J. Kieling, NMED ED
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CBFO QA File
CBFO M&RC
*ED denotes electronic distribution



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

AUDIT REPORT

OF

AUDIT NUMBER A-18-22

June 12 – 14, 2018

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

CARLSBAD, NEW MEXICO



Prepared by: *James R. Schuetz*
James Schuetz, CTAC
Audit Team Leader

Date: 8/13/18

Approved by: *D. J. Meiers FOR*
Donald C. Gadbury, CBFO
Quality Assurance Director

Date: 8-13-18

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) conducted Audit A-18-22 on June 12 – 14, 2018, 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, Rev. 13, *CBFO Quality Assurance Program Document (QAPD)*, WP 13-1, Rev. 38, *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. This report indicates the NQA-1 criteria that were evaluated during the audit and the criteria that were removed from this scope as these were deferred to another assessment or were addressed in previous recent assessment activities.

The audit team identified two Conditions Adverse to Quality (CAQs) related to 1) the trending of Nonconformance Reports (NCRs) and 2) the completion and management of records related to monthly and annual verification of distribution of NWP documents, which resulted in the issuance of Corrective Action Reports (CARs) 18-040 and 18-041 (see Section 6.1).

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.

NQA-1 criteria 1, 2, 5, 6, and 9 were evaluated by conducting procedure review for adequacy of flow down of requirements, conducting interviews with NWP personnel who performed procedure implementation, and reviewing objective evidence of documentation of implementation. Planning for evaluation of NQA-1 criterion 3 lead to identification of 46 ICE Issues related to implementation of design control by NWP. Due to the large number of identified issues, the audit team lead and the CBFO management representative determined that a separate assessment of the design control criterion is appropriate to adequately cover NQA-1 Criterion 3 Design Control scope. NQA-1 criteria 4, 7, and 8 were evaluated by review of recently conducted assessments that covered these criteria. The review of previous assessments with respect to status of the current programs and compliance with requirements is included in this audit report.

NWP procedures related to NQA-1 criteria 1, 2, 5, 6, and 9 were evaluated for adequacy based on the CBFO QAPD, Rev. 13.

3.0 AUDIT TEAM

Martin Navarrete	QA Management Representative, CBFO
Micheal Stapleton	CBFO Quality Assurance Specialist
Jim Schuetz	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Matt Leroy	Auditor, CTAC
Charlie Riggs	Auditor, CTAC
Jack Walsh	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 June 12, 2018. The audit was concluded with a post-audit conference in the NWP Support Building small conference room on June 14, 2018.

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 addresses NQA-1-1989 Criteria 1, 2, 5, 6, and 9 and implements procedures to determine overall effectiveness of the program.

The audited areas are described below. Two CAQs, 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 of the NWP QA Program and implementing procedures with NQA-1-1989 Criteria 1, 2, 5, 6, and 9. NWP implementing procedures related to each criterion were selected for this 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 (for internal distribution only) that was supplied to the audit team by NWP personnel. The audit team evaluated the reporting lines indicated on the current NWP organizational chart and determined that the QA Manager reports to a deputy director as opposed to reporting directly to the President and Project Manager. The audit team identified an observation that this line of reporting is not strictly followed in accordance with NQA-1 and CBFO standard conventions. The observation indicates a possible future deficiency related to organizational freedom from cost and schedule for the QA department (see Section 7.1). A review by NWP management of the QA department reporting structure and representation of the structure on the organization chart by NWP will address the observed condition. Furthermore, based on interviews with NWP personnel and review of program documents, the audit team determined that QA responsibilities are adequately 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 organizational structure, functional responsibilities, levels of authority, and levels of communications for activities affecting quality are adequately established for compliance with upper-tier requirements, satisfactorily implemented, 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 *Quality Assurance Department Administrative Program*.

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 regarding structure of a QA program.

Training

The audit team evaluated the NWP Training Program and training of selected NWP personnel that were interviewed during the audit and that were identified in objective evidence documents as having implemented procedures and generating the records that were reviewed. 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.

Lessons Learned

The audit team evaluated the Operating Experience/Lessons Learned (OE/LL) Program. The audit team interviewed personnel and reviewed documentation posted on the WIPP Central webpage. The audit team determined that lessons learned items are identified, reviewed, approved for posting, and posted in accordance with NWP procedure WP 15-CA1012 *Operating Experience/Lessons Learned Program*. The audit team determined that the program was well maintained including required hard copies of OE/LL documents.

Trending

The audit team evaluated the NWP trending of CAQs identified in WIPP Forms written in accordance with NWP procedure WP 15-CA1013 *WIPP Form Trend Analysis Guide*. The audit team noted that WIPP Forms are generated where an NCR is determined to contain programmatic or other issues that are not able to be resolved with closure of an NCR. All WIPP Forms are analyzed, trended, and reported on a semiannual trend report with adequate distribution to appropriate departments.

The audit team evaluated the NWP trending of CAQs identified in NCR reports written in accordance with NWP procedure WP 13-QA3004 *Nonconformance Report*. The audit team determined that NCRs are being tracked and are included in evaluation for maintaining vendors on the Qualified Suppliers List (QSL). The audit team identified one CAQ related to NCRs not being trended and reported on the required periodic Trend Report (see Section 6.1 CAR 18-040).

Accounting for the nature of the NCR trending implementation concern, the audit team concluded that the NWP QA Program was adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criterion 3 – Design Control

In preparation for this audit, the audit team leader generated a listing of recent ICE Issues and CBFO Corrective Action Reports (CARs) related to the NQA-1 design control criterion and the NWP design control process. Attachment 3 provides a listing of the 46 ICE Issues that will be evaluated during audit A-18-29. The audit team leader determined that CBFO oversight personnel have identified numerous ICE Issues and Operational Awareness reports related to the NWP design control process. The audit team notified the CBFO QA department that a separate assessment is appropriate and audit A-18-29 is tentatively scheduled for September 11-13, 2018 to allow evaluation of the content of these design related ICE Issues and Operational Awareness reports and of the content, scope, and status of associated corrective actions proposed by NWP. Therefore, Criterion 3 will be assessed in the separate CBFO audit A-18-29 and a determination of adequacy, satisfactory procedure implementation, and program effectiveness will be presented in that audit report.

Criterion 4 – Procurement Document Control

NQA-1-1989, Criterion 4, *Procurement Document Control* was removed from the scope of this assessment as this subject was covered under previous CBFO assessments of the NWP procurement program. There have been four CBFO assessments of the NWP procurement program within the last three years that were related to procurement activities implemented by NWP. Attachment 4 provides a listing of the two CBFO procurement related assessments. The audit team reviewed reports for these assessments and determined that the aggregate of evaluations stated in the content of the reports demonstrates adequate compliance of the NWP procurement program with NQA-1 Criterion 4 requirements. Therefore, Criterion 4 was assessed by performing review of previous CBFO assessment activities of the NWP procurement program and the audit team determines that NWP procurement procedures are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criterion 5 – Instructions, Procedures, and Drawings

The audit team reviewed implementing procedures to verify that the program meets upper-tier requirements. The evaluation included review of NWP procedure WP 10-WC3010, Rev. 30-FR2, *Periodic Maintenance Administration and Controlled Document Processing*. The audit team identified that entries in the *Description of Changes* column of the *Change History Summary* table do not always state the parent or replaced procedures where the new procedure is a compilation of several procedures. Entries also do not always indicate that the procedure implements new requirements. The audit team recommends that the parent or replaced procedures or requirement references be stated where appropriate to provide users with information regarding procedure history (see Section 7.2).

The audit team conducted interviews with maintenance and engineering personnel and determined that the WP 10-WC3010 procedure and process for development, revision, review, approval, and cancellation of Periodic Maintenance (PM) tasks and procedures are under major revision to streamline the process.

An assessment will be scheduled to address the WP 10-WC3010 new procedure and PM process after the revised procedure becomes effective and allowing sufficient time for procedure implementation and generation of objective evidence for evaluation. The progress of the revision of the procedure and process will be monitored to determine the assessment date and a determination of adequacy, satisfactory procedure implementation, and program effectiveness will be presented in the report of that audit.

Considering that the WP 10-WC3010 procedure and PM process are currently under revision, the audit team concluded that the NWP PM development, revision, review, approval, and cancellation process is currently adequately established for compliance

with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criterion 6 – Document Control

The audit team evaluated NWP implementing plans and procedures related to document control and determined that the plans and procedures adequately address upper-tier requirements of the CBFO QAPD Section 1.4 *Documents*. The audit team reviewed objective evidence of implementation of the document control program and process, interviewed NWP document control personnel, and verified implementation activities, including the specific processes discussed below.

Procedure Writer's Manual

The audit team evaluated the use of NWP WP15-PS.2, Rev. 15, *Procedure Writer's Manual*. A sample of NWP documents created using the manual were evaluated for format, step numbering, title format, and special markings such as "Continuous Use Procedure." The following documents were reviewed during the evaluation.

- WP 13-QA.03, *Quality Assurance Independent Assessment Program*, Revision 27 (effective date of 03/22/18)
- WP 13-QA.06, *Quality Assurance Department Qualification and Certification of Nondestructive Examination Personnel*, Revision 10 (effective date of 04/30/15)
- WP 13-QA1007, *Dimensional Inspection*, Revision 5 (effective date of 09/15/16)
- WP 13-QA3004, *Nonconformance Report*, Revision 16 (effective date of 04/11/17)
- WP 13-QA3007, *CBFO Assessment Activity and Corrective Action Coordination*, Revision 13 (effective date of 05/09/17)
- WP 14-TR.01, *WIPP Training Program*, Revision 21 (effective date of 04/24/18)
- WP 15-RM3002, *Records Filing, Inventorying, Scheduling, and Dispositioning*, Revision 9 (effective date of 04/04/17)

Document Distribution

The audit team evaluated NWP procedure WP 15-PS3103, Revision 18, *Document Distribution* and determined that the procedure adequately addresses upper-tier requirements of the CBFO QAPD Section 1.4 *Documents* related to distribution and control of NWP procedure documents.

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 that responsible individuals appropriately enter the new revised procedure

documents into OHBs and destroy obsolete versions of controlled documents as required.

The audit team identified concerns related to the document distribution process including the following items. These concerns are reflected in CBFO CAR 18-041 (see Section 6.1).

- Attachments 2 and 3 are not defined as records in the procedure; these attachments include quality information and qualify as records
- Filled-in Attachment 4 *OHB/CDL Monthly Verification Log Sheet* forms are noted in the procedure as records and are not maintained in accordance with WP 15-RM *WIPP Records Management Program*
- Filled-in Attachment 4 forms have only been maintained since August 2017; the procedure was issued in September 2016
- The Records Inventory and Disposition Schedule (RIDS) for *Document Services*, dated January 2, 2018, which governs records for document control, does not define/include procedure attachments identified as records in the procedure
- The Procedures Manager has not recently performed a Self-Assessment (annual verification per section 3.6.2 [C] Annual Verification of OHB/CDL – documenting the annual verification as a formal self-assessment)
- The Procedures Manager has not performed procedure requirement step 3.6.2 [B] Annual Verification of OHB/CDL – monthly CDL walkdown / inspection
- Filled-in Attachment 4 forms are incomplete, lacking a reviewers signature and date

Accounting for the nature of the document distribution concerns that were identified, the evaluation of the procedure and objective evidence provided evidence that the applicable requirements for NWP document distribution are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving a document distribution process.

Controlled Document Processing

The audit team evaluated NWP procedures WP 15-PS3002, Revision 41, Field Revision 2, *Controlled Document Processing*, and WP 15-PS3006, Revision 6, *Processing NWP Forms and Electronic Attachments* to determine the degree to which the procedures adequately address upper-tier requirements. 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 determined that the document control and processing procedures adequately address upper-tier requirements.

The audit team conducted interviews with the Procedure and Training Manager and several document control personnel. The audit team also observed activities for adherence to approved procedures and evaluated recently completed document review records in the Q&MIS software application used by NWP for electronic document

management system. The team verified the initiation of procedure changes by reviewing several Procedure Change Request forms (EA15PS3002-8-0) and procedure implementation activities including the proper processing of the documents and electronic attachments in regard to their issuance for review, resulting review comments, resolution of resulting review comments, and document approval. Several case files were reviewed associated with current procedures. The audit team verified that "obsolete" NWP documents were properly processed, the appropriate approval authority had been documented, and the documents had been removed from the Q&MIS electronic document management system. Likewise, the audit team verified that current procedure versions are appropriately posted and available for use in the Q&MIS electronic document management system.

No concerns were identified related to revision, processing, or control of NWP procedures. The audit team determined that document control processes and procedures were adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criterion 7 – Control of Purchased Items and Services

NQA-1-1989, Criterion 7, *Control of Purchased Items and Services* was removed from the scope of this assessment as this subject was covered under previous CBFO assessments of the NWP material control program. There have been two CBFO assessments of the NWP material control program within the last three years that were related to material control and stores inventory management activities implemented by NWP. Attachment 5 provides a listing of the two CBFO material control related assessments. The audit team reviewed reports for these assessments and determined that the aggregate of evaluations stated in the content of the reports demonstrates adequate compliance of the NWP material control and stores inventory management programs with NQA-1 Criterion 7 requirements.

Therefore, Criterion 7 was assessed by performing review of previous CBFO assessment activities of the NWP procurement program and the audit team determines that NWP procurement procedures are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and marginally effective in achieving the desired results. Effectiveness will be evaluated in subsequent assessments after corrective actions are complete as identified in the two recent assessments and as addressed in CBFO CARs.

Criteria 8 – Identification and Control of Items

NQA-1-1989, Criterion 8, *Identification and Control of Items* was removed from the scope of this assessment as this subject was covered under previous CBFO assessments of the NWP procurement and material control programs. There have been four CBFO assessments of the NWP procurement program and two CBFO assessments of the material control program within the last three years. Attachment 4 provides a listing of the two CBFO procurement related assessments. Attachment 5

provides a listing of the two CBFO material control related assessments. The NWP program provides details of identification of items within these two programs where items are identified and classified prior to procurement. The audit team reviewed reports for these assessments and determined that the aggregate of evaluations stated in the content of the reports demonstrates adequate compliance of the NWP item identification and control with NQA-1 Criterion 8 requirements.

Therefore, Criterion 8 was assessed by performing review of previous CBFO assessment activities of the NWP procurement program and the audit team determines that NWP procurement procedures are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criteria 9 – Control of Processes

The audit team evaluated those NWP QA Program elements for implementing NQA-1, Criterion 9, *Control of Processes*. The team conducted interviews with responsible personnel and reviewed the following implementing procedures.

- WP 13-QA1001, Rev. 9, Liquid Penetrant Examination
- WP 13-QA1002, Rev. 9, Visual Examination
- WP 13-QA1004, Rev. 8, Magnetic Particle Examination
- WP 13-QA1006, Rev. 17, Quality Assurance Plant Inspections
- WP 13-QA1007, Rev. 5, Dimensional Inspection
- WP 13-QA.05, Rev. 12, Suspect/Counterfeit Items Program
- WP 13-QA.06, Rev. 10, Quality Assurance Department Qualification & Certification of Nondestructive Examination Personnel

Results of the reviews indicate that the procedures adequately address upper-tier requirements.

The team interviewed personnel in the QA organization 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. 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. Welding work orders were examined to verify compliance with requirements stipulated in WP 10-5, *WIPP Welding Guide*. These welding work orders included replacement of roll-up doors in the waste handling building.

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 concerns 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, satisfactorily implemented, 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 Conditions Adverse to Quality (CAQ) and document such conditions on Corrective Action Reports (CARs).

Two CARs, described below, were initiated as a result of this audit. The CARs were transmitted to NWP under separate cover.

CBFO CAR 18-040

Nuclear Waste Partnership (NWP) is not trending NCRs in accordance with NWP procedures in accordance with the following NWP procedures.

WP 13-1, *NWP Quality Assurance Program Description*, Rev. 38, Section 1.3.3 states: "Nonconformance documentation shall be periodically analyzed by the QA organization to identify trends in accordance with the Corrective Action section of this QAPD."

WP 13-QA3004, *Nonconformance Report*, Rev. 16, Introduction; states: "Control of nonconforming items, materials, and products includes tracking, trending, verification of disposition/resolution, revision, closeout, and retention of records."

CBFO CAR 18-041

The following concerns were identified regarding implementation of procedure *Document Distribution*, WP 15-PS3103, Rev. 18.

- Attachments 2 and 3 are not defined as records in the procedure; these attachments include quality information and qualify as records
- Filled-in Attachment 4 forms are noted in the procedure as records and are not maintained in accordance with WP 15-RM *WIPP Records Management Program*
- Filled-in Attachment 4 forms have only been maintained since August 2017; the procedure was issued in September 2016
- The Records Inventory and Disposition Schedule (RIDS) for *Document Services*, which governs records for document control, does not define/include procedure attachments identified as records in the procedure
- The Procedures Manager has not recently performed a Self-Assessment (annual verification per section 3.6.2 [C] Annual Verification of OHB/CDL – documenting the annual verification as a formal self-assessment)
- The Procedures Manager has not performed procedure requirement step 3.6.2 [B] Annual Verification of OHB/CDL – monthly CDL walkdown / inspection
- Filled-in Attachment 4 forms are not complete, lacking a reviewers signature and date

NWP procedure WP 15-PS3103, Rev. 18, section 3.6.1 [E] Monthly Verification of OHB/CDL states: “DC retain Attachment 4, OHB/CDL Monthly Verification Log Sheet, as a record.”

NWP Procedure WP 15-PS3103, Rev. 18, section 3.6.2 [C] Annual Verification of OHB/CDL states: “Procedures Manager, document the annual verification as a formal self-assessment per WP 15-CA1002, Self-Assessments.”

NWP procedure WP 15-PS3103, Rev. 18, section 3.6.2 [B] Annual Verification of OHB/CDL states: “Procedures manager, accompany DC personnel and observe the inspection of at least one OHB/CDL per section 3.6.1 of this procedure.”

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

The reporting lines for the QA department showing on the internal distribution organization chart was evaluated. The organization chart graphically indicates that the QA Manager reports to a Deputy Director as opposed to reporting directly to the President and Project Manager position. The audit team observed that this line of reporting is not strictly represented as being in accordance with NQA-1 and CBFO requirements. The audit team interviewed QA personnel and determined that they regard their department as currently operating with sufficient independence and organizational freedom from cost and schedule. While the graphical representation of reporting lines appears to be different than required, the audit team did not identify a deficient condition at this time. The organization chart and the function of reporting of the QA department will be monitored in future assessments to ensure that a deficient condition does not occur.

7.2 Recommendations

During the evaluation of procedures for adequacy and review of procedure changes, the audit team identified that new Rev. 0 procedures that are summaries of several procedures or that replace other procedures do not always state the parent or replaced procedures or indicate that the procedure implements new requirements in the *Description of Changes* column of the *Change History Summary* table. The terms "New Document" or "Initial Issue" were identified as describing documents with Rev. 0. As there is no upper-tier or procedure requirement for this notation, the audit team recommends that the parent or replaced procedures or requirement reference be stated to provide users with information regarding procedure history and for consistency in document formatting.

8.0 LIST OF ATTACHMENTS

- Attachment 1: Personnel Contacted During the Audit – A-18-22
- Attachment 2: NWP Implementing Procedures Evaluated – A-18-22
- Attachment 3: List of the 46 ICE Issues to be evaluated during A-18-29 NWP QAPD Implementation Audit (Criteria 3 - Design Control)
- Attachment 4: List of the four Procurement based assessments of the NWP program
- Attachment 5: List of the two Materials Handling based assessments of the NWP program

PERSONNEL CONTACTED DURING THE AUDIT – A-18-22				
NAME	ORGANIZATION/ DEPARTMENT	PRE-AUDIT MEETING	CONTACTED DURING AUDIT	POST-AUDIT MEETING
Traci Arnwine	NWP Training & Procedures		X	
Veronica Ballew	NWP / Q&CA	X	X	
Bob Billett	NWP / Q&CA		X	
Jessica Bishop	NWP Training & Procedures		X	
Amy Boyea	NWP / Q&CA		X	
Becky Brown	NWP / Q&CA		X	
Mark Davis	NWP / Q&CA / QA Op Engineering		X	
Mark Edwards	NWP	X		
Tiffany Gutierrez	NWP / Human Resources		X	
Preston Harvey	NWP / QA		X	
William G. Helton	NWP / QA		X	
Tori Holt	NWP Training & Procedures		X	
Stewart Jones	RES Site Environmental Compliance		X	
Cindi Kruger	NWP Training & Procedures		X	
Heidi Lowe	NWP Training / Records		X	
Mary McDaniel	NWP / Q&CA		X	X
Carla Miller	NWP / QA	X		
Candace Nance	NWP Training & Procedures		X	
Wes Nance	NWP Work Control		X	
Berry Pace	NWP / CCP	X		
Robert Rhodes	NWP Work Control		X	
Sheri Saiz	NWP / QA	X	X	X
Steve Tanner	NWP QA Op Engineering		X	
Charles Tyler	NWP / QA	X		X

NWP Implementing Procedures Evaluated – A-18-22		
NQA-1 Criteria	Doc. Number	Applicable NWP Document
1 – Organization		
	WP 13-QA.04	<i>Quality Assurance Department Administrative Program</i>
	WP 13-QA3004	<i>Nonconformance Report</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-CA1012	<i>Operating Experience / Lessons Learned Program</i>
	WP 15-GM.03	<i>Integrated Safety Management System Description</i>
	WP 15-CA1008	<i>Trend and Cause Code Configuration Management</i>
	WP 15-CA1013	<i>WIPP Form Trend Analysis Guide</i>
5 – Instructions, Procedures, and Drawings		
	WP 10-WC3010	<i>Periodic Maintenance Administration and Controlled Document Processing</i>
<i>Note that this procedure was evaluated and determined to be under major revision. A subsequent assessment will be scheduled of the revised / effective procedure allowing sufficient time for implementation and generating objective evidence for evaluation.</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>
	WP 13-QA.03	<i>Quality Assurance Independent Assessment Program</i>
	WP 15-RM3002	<i>Records Filing, Inventorying, Scheduling, and Dispositioning</i>
	WP 13-QA3007	<i>CBFO Assessment Activity and Corrective Action Coordination</i>
	WP 15-RM	<i>WIPP Records Management Program</i>
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 Examination</i>
	WP 13-QA1004	<i>Magnetic Particle Examination</i>
	WP 13-QA1006	<i>QA Plant Inspections</i>
	WP 13-QA1007	<i>Dimensional Inspection</i>
	WP 13-QA.05	<i>Suspect/Counterfeit Items Program</i>
	WP 13-QA.06	<i>QA Department Qualification & Certification of NDE Personnel</i>

List of the 46 ICE Issues to be evaluated during
A-18-29 NWP QAPD Implementation Audit (Criteria 3 - Design Control)

Issue ID #	Status	Issue Manager	Originator	Date Originated
19	Closed	Elmore, Randy	Hollowell, Clayton	11/17/2014
147	Closed	Allen - CTAC, Randall	Allen - CTAC, Randall	6/23/2015
169	Closed	Elmore, Randy	Waters, Jim	7/16/2015
173	Closed	Elmore, Randy	Hollowell, Clayton	10/19/2015
180	Closed	Elmore, Randy	Hollowell, Clayton	7/20/2015
203	Closed	Elmore, Randy	Galbraith, Don	7/16/2015
206	Closed	Garza, Ed	Hollowell, Clayton	6/25/2015
207	Closed	Elmore, Randy	Hollowell, Clayton	6/26/2015
238	Closed	Elmore, Randy	Hollowell, Clayton	8/26/2015
259	Closed	Elmore, Randy	Swartz - CTAC, Laura	6/30/2016
260	Closed	Elmore, Randy	Swartz - CTAC, Laura	10/19/2015
266	Deleted	Unassigned	Chiou, Hung-Cheng	10/16/2015
272	Closed	Elmore, Randy	Swartz - CTAC, Laura	1/4/2016
280	Closed	Elmore, Randy	Swartz - CTAC, Laura	1/4/2016
281	Closed	Elmore, Randy	Swartz - CTAC, Laura	1/4/2016
283	Closed	Elmore, Randy	Swartz - CTAC, Laura	1/4/2016
294	Closed	Elmore, Randy	Hollowell, Clayton	1/4/2016
307	Dismissed	Elmore, Randy	Chiou, Hung-Cheng	11/2/2015
308	Closed	Elmore, Randy	Waters, Jim	1/4/2016
309	Closed	Elmore, Randy	Swartz - CTAC, Laura	11/20/2015
310	Closed	Elmore, Randy	Swartz - CTAC, Laura	11/20/2015
391	Closed	Elmore, Randy	Hollowell, Clayton	2/9/2016
407	Approved	Garza, Ed	Hollowell, Clayton	2/12/2016
450	Closed	Elmore, Randy	Waters, Jim	4/11/2016
451	Closed	Elmore, Randy	Waters, Jim	4/11/2016
452	Closed	Elmore, Randy	Hollowell, Clayton	4/11/2016
453	Closed	Elmore, Randy	Hollowell, Clayton	4/11/2016
454	Closed	Elmore, Randy	Hollowell, Clayton	4/11/2016
480	Approved	Elmore, Randy	Hollowell, Clayton	4/22/2016
482	Closed	Elmore, Randy	Hollowell, Clayton	4/25/2016
485	Approved	Elmore, Randy	Hollowell, Clayton	4/25/2016
539	Approved	Elmore, Randy	Carrasco, Joseph	8/4/2016
551	Approved	Elmore, Randy	Carrasco, Joseph	8/21/2016
730	Approved	Hollowell, Clayton	Hollowell, Clayton	3/13/2017
768	Approved	Garza, Ed	Hollowell, Clayton	4/13/2017
771	Approved	Garza, Ed	Elmore, Randy	4/24/2017
844	Approved	Garza, Ed	Elmore, Randy	9/12/2017
845	Approved	Garza, Ed	Elmore, Randy	9/12/2017
846	Approved	Garza, Ed	Elmore, Randy	9/12/2017
867	Approved	Hollowell, Clayton	Hollowell, Clayton	3/15/2018
881	Approved	Hollowell, Clayton	Sanders, Ralph	11/13/2017
884	Started (Unsubmitted)	Unassigned	Elmore, Randy	10/30/2017
889	Closed	Mackie, Bill	Ward, Anderson	11/21/2017
906	Approved	Hollowell, Clayton	Padilla, Ken	1/17/2018
922	Closed	Elmore, Randy	Carrasco, Joseph	2/1/2018
926	Approved	Elmore, Randy	Theisen, Philip	2/19/2018

List of the four Procurement based assessments of the NWP program

#	Title	Date	Assessment Report Summary
A-16-13	NWP Contractor Assurance System Program	July 19 – 21, 2016	<p>A-18-22 audit team reviewed the A-16-13 audit report and concurs with the determination that the NWP procurement and graded approach programs are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results, considering the six concerns identified during the audit.</p> <p>The A-16-13 audit scope included Procurement and Graded Approach programs.</p> <p>The A-16-13 audit team identified six CAQ during the audit and wrote the following six CBFO CARs.</p> <p>CAR 16-052 – The Management Level Determination (MLD) did not address vendor service aspects of procurement of an ICP-MASS Spectrometer.</p> <p>CAR 16-053 – There are conflicting MLDs for the same item in sections of procurement documents for one procurement.</p> <p>CAR 16-054 – mixed MLDs in one procurement.</p> <p>CAR 16-055 – lack of establishment of a training program for NWP buyers</p> <p>CAR 16-056 – lack of training documentation for six of the 22 requisitioners/reviewers/approvers personnel</p> <p>CAR 16-057 – lack of establishment of a procedure for the activities of the NWP Procurement buyers</p> <p>The A-16-13 audit team wrote no CDAs or Observations and identified one Recommendation.</p> <p>Recommendation 1 – The audit team recommends clarification of one statement in procedure WP 15-PC3605, section 3.1.</p>

List of the four Procurement based assessments of the NWP program (continued)

#	Title	Date	Assessment Report Summary
A-17-19	NWP Procurement and Graded Approach	July 25 – 27, 2017	<p>A-18-22 audit team reviewed the A-17-19 audit report and concurs with the determination that the NWP procurement and graded approach programs are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results, considering the two concerns identified during the audit.</p> <p>The A-17-19 audit scope included Procurement and Graded Approach programs.</p> <p>The A-17-19 audit team identified two CAQ during the audit and wrote the following two CBFO CARs. CAR 17-042 – conflicting QA nondestructive examination requirements in one procurement CAR 17-043 – revision of one purchase order included conflicting MLDs.</p> <p>The A-17-19 audit team wrote no CDAs, Observations, or Recommendations.</p>

List of the two Materials Handling based assessments of the NWP program

#	Title	Date	Assessment Report Summary
A-17-32	NWP Material Control and Stores Inventory	February 7 – 9, 2017	<p>A-18-22 audit team reviewed the A-17-32 audit report and concurs with the determination that the NWP material control and stores inventory program is adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results, considering the six concerns identified during the audit.</p> <p>The A-17-32 audit scope included material control, receiving, and stores inventory programs.</p> <p>The A-17-32 audit team identified six CAQ during the audit and wrote the following five CBFO CARs and one CDA.</p> <p>CAR 17-017 – revise WP 12-HP3200, <i>Radioactive Material Control</i> to reflect the current process of handling packages containing radioactive material.</p> <p>CAR 17-018 – revise WP 15-PM3518, <i>Material Receiving</i> to state that purchased materials only be accepted by authorized representative.</p> <p>CAR 17-019 – improper alteration of EA15PM3525-1-0, Shipping Authorization form including incorrect or missing block numbers.</p> <p>CAR 17-020 – identified missing dates, signatures, and blank spaces on EA15PM3509-1-0, <i>Declaration of Excess/Retired Equipment</i> forms.</p> <p>CAR 17-027 – placement of materials into service prior to formal receipt and processing per WP 15-PM3518, <i>Material Receiving</i>.</p> <p>CDA #1 – lack of CBFO contracting officer signature for retiring property in excess of \$5000.00 cost</p> <p>The A-17-32 audit team wrote two Observations and no Recommendations.</p> <p>Observation 1 – clarification of the manual data entry and store stock request (SSR) number assignment and record keeping process</p> <p>Observation 2 – minor revision of the form EA15PM3509-2-0, <i>OnSite Property Transfer</i>.</p>

List of the two Materials Handling based assessments of the NWP program (*continued*)

#	Title	Date	Assessment Report Summary
A-18-08	NWP Material Control and Stores Inventory	January 30 – February 8, 2018	<p>A-18-22 audit team reviewed the A-18-08 audit report and concurs with the determination that the NWP material control and stores inventory program is adequately established for compliance with upper-tier requirements, satisfactorily implemented, and marginally effective in achieving the desired results, considering the five concerns identified during the audit.</p> <p>The A-18-08 audit scope included material control, receiving, and stores inventory programs.</p> <p>The A-18-08 audit team identified five CAQ during the audit and wrote the following five CBFO CARs and one CDA.</p> <p>CAR 18-012 – editorial and other errors identified in NWP procedure WP 15-PM3518, <i>Material Receiving</i>.</p> <p>CAR 18-014 – inventory items not found in warehouse.</p> <p>CAR 18-015 – proper handling of electronic parts and materials.</p> <p>CAR 18-016 – issues with warehouse access and material control.</p> <p>CAR 18-017 – equipment held for future projects program are being used as spare parts inventory</p> <p>The A-18-08 audit team wrote no CDA, two Observations, and no Recommendations.</p> <p>Observation 1 – editorial change to EA15PM3517-1-0, <i>Stores Stock Request (SSR)</i> form and clarification of instructions for completing block #9 of the SSR form requiring the requestor to work with inventory control personnel when making final "Category" determinations.</p> <p>Observation 2 – clarification of procedure WP 15-PM3517, <i>Stores Inventory Control</i> to direct users to complete an EA15PM3517-1-0, <i>Stores Stock Request (SSR)</i> form when making changes to stores inventory.</p>