

United States Government

Department of Energy

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**memorandum**Carlsbad Area Office  
Carlsbad, New Mexico 88221**ENTERED**

DATE: April 13, 1999

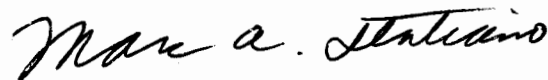
REPLY TO  
ATTN OF: CAO:QA:MAI:99-0596:UFC 2300.00

SUBJECT: CAO Quality Assurance Program Document (QAPD) Interpretation Number 99-01

TO: Distribution

CAO has recently observed instances of misinterpretation of the QAPD requirements in the area of preparation and maintenance of the QAPD procedures matrix and in the area of CAO review and approval of revisions to Graded Approach procedures. Attached is QAPD Interpretation 99-01, which should assist in clarifying the QAPD requirements.

If you have any questions, please contact me at (505) 234-7484.



Marc A. Italiano  
Quality Assurance Manager

Attachment

990412



## CAO QAPD INTERPRETATION NUMBER 99-01

### QAPD PROCEDURES MATRIX REQUIREMENT

CAO QAPD, Revision 2, paragraph 1.1.2.2 A. *Procedures Matrix*; states that: "Each organization that directly supports CAO activities shall prepare and maintain a procedures matrix that identifies applicable documents of each organization or project that implement each applicable requirement of this QAPD. The matrix shall specifically reference the applicable portion of the procedure or document. The matrix shall be updated as implementation procedures are revised"

#### INTERPRETATION

While the QAPD no longer requires organizations to submit their QAPD Procedures Matrix for formal CAO review prior to issuance, the matrix is subject to informal CAO review at any time, and especially in the support of audit preparations. However, the QAPD requires the matrix to be updated as implementation procedures are revised – not simply at the time of, or in preparation for, upcoming audits. Additionally, the level of detail must be such that each requirement in the QAPD can be correlated to a specific portion of an implementing procedure or document.

#### IMPLEMENTATION

Organizations' procedure(s) and/or plans must require that the matrix shall be maintained and updated as implementing procedures are revised. It must also be clear that it is required to correlate each requirement in the QAPD to a specific portion of an implementing procedure or document.

### GRADING PROCEDURES REQUIREMENT

CAO QAPD, Revision 2, paragraph 1.1.2.4 D. *Grading Items and Activities and Applying Management Controls*; states in part that: "Program participant procedures which establish and implement a graded approach...shall be submitted to the CAO QA Manager for approval for use in CAO programs." Paragraph 1.4.2.3, *Document Changes*, states in part that: "Changes to documents...shall be reviewed and approved by the same organizations that performed the original review and approval."

#### INTERPRETATION

Organizations are to submit their respective grading procedures **and** subsequent revisions to the CAO QA Manager for review and approval prior to implementation.

#### IMPLEMENTATION

Organizations' procedure(s) and/or plans must require that grading procedures **and** their subsequent revisions shall be submitted to the CAO QA Manager for review and approval prior to implementation.

NOTE: Failure to maintain a current matrix and/or to submit revisions to grading procedures can result in the issuance of CAO Corrective Action Reports (CARs) upon discovery of the deficiency.

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