

United States Government

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Department of Energy  
Carlsbad Area Office

# memorandum



DATE: July 27, 1999

REPLY TO: CAO:QA:MLC 99-0892    UFC 2300.00

ATTN OF:

SUBJECT: Audit Report for CAO Audit A-99-14

TO: Joe Epstein, General Manager

The Carlsbad Area Office (CAO) performed Audit A-99-14 of the Westinghouse Waste Isolation Division (WID) on June 28 – July 2, 1999. Except as noted in CAO Corrective Action Reports (CARs) 99-083 through 99-088, the audit team concluded that, 1) the WID implementing procedures are adequate (the flowdown of requirements) in accordance with the WID Quality Assurance Program Description, 2) the WID procedures are being satisfactorily implemented, and 3) the evaluated processes are effective.

As a result of the audit, six CARs were issued and sent to WID under separate cover.

If you have any questions or comments, please contact me at (505) 234-7423.

*M. Sea Chism*

*for* Samuel A. Vega  
CAO Quality Assurance Manager

## Attachment

cc w/attachment:

G. Young, WID

K. Hunter, CAO

W. Walker, CAO

L. Chism, CAO

M. Eagle, EPA

✓ S. Zappe, NMED

B. Walker, EEG

W. Ledford, CTAC

T. Bowden, CTAC

990720



U.S. DEPARTMENT OF ENERGY  
CARLSBAD AREA OFFICE

AUDIT REPORT

OF THE

WESTINGHOUSE WASTE ISOLATION DIVISION (WID)

CARLSBAD, NEW MEXICO

AUDIT NUMBER A-99-14

JUNE 28 - JULY 2, 1999

WID QUALITY ASSURANCE PROGRAM



Prepared By:

Wayne Ledford  
Wayne Ledford

Audit Team Leader

Date:

7/26/99

Approved By:

M. Dea Chism  
for Samuel A. Vega  
CAO QA Manager

Date:

7/27/99

## **1.0 EXECUTIVE SUMMARY**

Carlsbad Area Office (CAO) Audit A-99-14 was conducted to evaluate the adequacy, implementation, and effectiveness of the Westinghouse Waste Isolation Division (WID) quality assurance (QA) program.

The audit was conducted at the WID facilities on June 28 through July 2, 1999. Except as noted in CAO Corrective Action Report (CAR) 99-087, the audit team concluded that the adequacy of the WID quality assurance program (the flowdown of requirements from the CAO Quality Assurance Program Document [QAPD]) has continued to be acceptable. Except as noted in CAO CARs 99-083 through 99-088, the audit team also concluded that the QA program has continued to be satisfactorily implemented in accordance with the WID Quality Assurance Program Description (QAPD) and implementing procedures. The WID QA program was determined to be effective.

The audit team identified seven conditions adverse to quality that resulted in the issuance of six CAO CARs. In addition, eight deficiencies, isolated in nature and requiring only remedial corrective actions, were Corrected During the Audit (CDA). Four Recommendations have been offered for management action and consideration. Three Observations were identified in the areas of system lineup checklists, Waste Stream Profile Form reviews, and review of waste processing data sheets. The audit team noted one Exemplary Practice being performed by WID personnel in the area of electronic document control and distribution. CARs, CDAs, Observations, Recommendations, and Exemplary Practices are described in Section 6.0.

## **2.0 SCOPE**

The audit team evaluated the adequacy, implementation, and effectiveness of technical and quality assurance processes related to the WID quality assurance program.

The following elements were evaluated in accordance with the CAO and WID QAPDs:

- Quality Assurance Program and Organization
- Personnel Qualification and Training
- Quality Improvement
- Inspection and Testing
- Work Processes
- Document Control
- Records
- Design Control
- Independent Assessment
- Control of Measuring and Test Equipment
- Procurement

The evaluation of WID quality assurance documents for adequacy was based on the current revisions of the following documents:

CAO QAPD  
WID QAPD  
Related WID technical and quality assurance implementing procedures

### **3.0 AUDIT TEAM AND OBSERVERS**

#### **CAO AUDIT TEAM**

Lea Chism	Management Representative/Auditor, CAO
Wayne Ledford	Audit Team Leader, CTAC
Amy Arceo	Auditor, CTAC
Earl Bradford	Auditor, CTAC
David Kimbro	Auditor, CTAC
Chet Wright	Auditor, CTAC

#### **OBSERVERS/INSPECTORS**

Ben Walker	Observer, EEG
John Goode	Inspector, EPA (Techlaw)

### **4.0 AUDIT PARTICIPANTS**

Individuals contacted during the audit are identified in Attachment 1. A preaudit conference was held in the WID Support Building Conference Room on June 28, 1999. A daily meeting was held with WID management and staff to discuss issues and potential deficiencies. The audit was concluded with a postaudit conference held in the WID Support Building Conference Room on July 2, 1999.

### **5.0 SUMMARY OF AUDIT RESULTS**

#### **5.1 Program Adequacy, Implementation, and Effectiveness**

The audit team concluded that, except for the areas identified in CAO CAR 99-087, the WID QA Program has continued to be adequate in meeting the requirements of the CAO QAPD, Revision 2 and the WID QAPD, Revision 16, Change 6. The audit team concluded that the QA Program continues to be satisfactorily implemented and effective, except as noted in CAO CARs 99-083 through 99-088.

## **5.2 QA Program Audit Details**

WID implementing procedures included in the audit are identified in Attachment 2. A summary table of audit results is provided as Attachment 3. Details of audit activities, including specific objective evidence reviewed, are contained within the audit checklists.

### **5.2.1 Design Control**

WID's design control processes were evaluated. Some design verification processes of the CAO QAPD have not been incorporated into the WID QAPD. This condition adverse to quality is documented in CAR 99-087. Instances were identified where the design verification procedure was not appropriately implemented (CAR 99-088).

Procedure, WP09-CN3007, contained a sequential step that was not being fully implemented. WID initiated a procedural change and deleted the paragraph in question (CDA 3). A Recommendation was identified regarding clarification of the instructions for changing the equipment register using a work order (Recommendation 2). Overall, design control was determined to be satisfactorily implemented and effective.

### **5.2.2 Inspection and Test Controls**

Inspection and test activities evaluated included the WID Metrology program, Nondestructive Examination, the WIPP start-up testing program, and control of health physics instrumentation. One CAR (99-085) and one other deficiency (CDA 2), both associated with the WID Metrology Program, were identified during the audit. The WID inspection and test programs were determined to be satisfactorily implemented and effective.

### **5.2.3 Compliance Reporting**

The Biennial Environmental Compliance Report (BECR) was included in the audit to provide evidence that the regulations contained in Public Law 102-579, as amended by Public Law 104-201, Section 9, were considered when developing the BECR. The assessment indicated that WID has appropriately considered the requirements of this law.

One Recommendation was identified concerning formalization of the process for obtaining input and reviewing the BECR (Recommendation 4).

### **5.2.4 WID Work Process Controls**

Various WID work processes were evaluated during the audit including, the administrative control of plant system lineups, equipment lock-out/tag-out procedures,

waste handling hoist operations, waste processing, waste handling area inspections, and corrective and preventive maintenance. Two Observations were identified in this area (Observations 1 and 2). Work process control was determined to be satisfactorily implemented and effective.

### **5.2.5 Records**

The audit team evaluated the control of QA records. This evaluation included a review of the development and maintenance of organizational Records Inventory and Disposition Schedules (RIDS), the training of records coordinators, records storage, correction, and validation, and other associated activities performed by Project Records Services. One condition adverse to quality was identified and is included as part of CAR 99-086. One deficiency regarding improper corrections to quality records was Corrected During the Audit (CDA 6). One Recommendation regarding the use of use of the "Best Available Copy Stamp" was noted (Recommendation 3). This area was determined to be satisfactorily implemented and effective.

### **5.2.6 Document Control**

The evaluation of document control included a review of the document change process; activities of the Document Review Committee; development, review, approval, and cancellation of WID controlled documents; and the document distribution process using the Pilgrim Q&MIS™ Electronic Document Control System. WID's use of the Q&MIS™ Electronic Document Control System was identified as an Exemplary Practice (Exemplary Practice 1). One condition adverse to quality regarding updating of Operator Handbooks was identified (CAR 99-086), and three deficiencies regarding identification of records generated by procedures were Corrected During the Audit (CDA 4, 5 and 6). Document control was determined to be satisfactorily implemented and effective.

### **5.2.7 QA Program and Organization**

WID QA program activities and organizational responsibilities were evaluated. This evaluation included review to assure that a QA management system was in place, including 1) the policies and procedures needed to implement the WID QAPD, 2) a system for the verification of quality, 3) Quality and Regulatory Assurance (Q&RA) Manager independence and freedom to effectively perform quality functions, and 4) a system to resolve differences of opinion involving QA program requirements. An adequacy issue was identified regarding the flowdown of requirements from the CAO QAPD into the WID QAPD. The deficiency was included in CAR 99-087. This area was determined to be satisfactorily implemented and effective. Due to the issues identified with the flowdown of requirements in CAR 99-087, the adequacy of this area was considered marginal.

### **5.2.8 Waste Stream Profile Form Reviews**

The audit team reviewed the process for WID's review and approval of Waste Stream Profile Forms (WSPFs). An Observation (Observation 3) was generated concerning deviations from the WSPF review procedure that occurred for the first three WSPFs reviewed by WID. This area was determined to be satisfactorily implemented and effective.

### **5.2.9 Procurement**

The audit team reviewed the processes for dealing with items and material that had identified nonconformances. Materials identified with problems, e.g., wrong part number, code not referenced, incorrect calibration record, etc, were verified as being satisfactorily maintained in the Stores QA Hold area, pending corrective action or other disposition.

WID procurement documentation was reviewed to assure the use of proper purchasing controls. Reviewed documents satisfactorily reflected the passing down of applicable technical and QA requirements including proper signatures for authentication and approval of applicable QA inspection requirements. Suppliers providing Design Classes II, IIIA, and IIIB (Essential Equipment) materials are qualified by audit and reevaluated annually.

This area was determined to be satisfactorily implemented and effective.

### **5.2.10 Independent Assessment**

Overall, WID's assessment/audit program, established in procedure WP13-QA.03, is satisfactory. However, the process for reporting audit results does not demonstrate full compliance with the CAO QAPD due, primarily, to a lack of direct correlation between the WID QAPD and the CAO QAPD, and the subsequent flowdown of requirements into WID's implementing procedure. WID QAPD adequacy issues are identified in CAR 99-087. A condition adverse to quality was identified in the contents of WID audit reports; the reports did not contain required statements of adequacy, implementation, and effectiveness. This condition is documented in CAR 99-083. One instance of procedural noncompliance was related to an audit records validation checklist not being completed. This item was Corrected During the Audit (CDA 1).

The assessment program described in WP02-PC.01 is specific to the WIPP Resource Conservation and Recovery Act (RCRA) Site Waste Screening and Acceptance Program. The procedure mirrors the requirements of the CAO audit process identified in CAO procedure MP 10.3, "Audits," but the procedure places several responsibilities on the RCRA Permitting Manager that are not under that position's purview. Other

portions of this document were simply not being implemented. This condition adverse to quality is identified on CAR 99-084.

This area was determined to be effective. However, due to the implementation issues identified in CARs 99-083 and 99-084, this area was determined to be marginally implemented.

#### **5.2.11 Quality Improvement**

The audit team evaluated WID processes for trending, corrective action reporting, work suspension and stop work, nonconformance reporting, the use of hold tags and root cause analysis. One Recommendation was identified regarding removing the arbitrary requirement for corrective action plans to be submitted within ten working days (Recommendation 1).

This area was determined to be effective and satisfactorily implemented.

#### **5.2.12 Training**

Training and Qualification programs were reviewed and found to be satisfactorily implemented in accordance with WID program requirements. Qualification/training programs were annually reviewed by the Facility Line Management for compliance with applicable changes, i.e., facility, procedures, regulations, etc. Continued training required for Level I Subject Matter Expert (SME) Instructors is conducted on two-year intervals. Examination records reviewed satisfactorily reflected scores of 80% or better for passing grades. Semiannual continuing training required for Level II and Level III Instructors was verified as accomplished. Personnel records (qualification, training, test scores, etc.) are stored and maintained in fire-rated steel file cabinets by the WID Technical Training Organization. Access to personnel records is effectively controlled by the Technical Training Manager.

One isolated condition adverse to quality regarding the continuing training for a Level I SME Instructor was Corrected During the Audit (CDA 8).

This area was determined to be satisfactorily implemented and effective.



## **6.0 CORRECTIVE ACTION REPORTS (CARs), DEFICIENCIES CORRECTED DURING THE AUDIT (CDAs), OBSERVATIONS, RECOMMENDATIONS, AND EXEMPLARY PRACTICES**

### **6.1 Corrective Action Reports**

#### **6.1.1 CAO CAR 99-083**

WID audit reports did not contain the required statements regarding adequacy, implementation, and effectiveness. The reports were also lacking audit details as required by the WID QAPD.

#### **6.1.2 CAO CAR 99-084**

Some requirements of the *WIPP RCRA-Specific Generator Site Waste Screening and Acceptance Program Plan*, WP02-PC.01, were not being implemented.

#### **6.1.3 CAO CAR 99-085**

Trending of calibration data for Monitoring and Data Collection Equipment was not being performed, as required by procedure WP10-AD3029, *Calibration and Control of Monitoring and Data Collection Equipment*.

#### **6.1.4 CAO CAR 99-086**

Operator Handbooks were not up to date. Some procedures did not specify records generated by the performance of the procedure.

#### **6.1.5 CAO CAR 99-087**

Several adequacy issues were identified in the WID QAPD in the areas of design verification and independent assessment.

#### **6.1.6 CAO CAR 99-088**

Several deficiencies were identified in the area of documentation of design verifications.

### **6.2 Deficiencies Corrected During the Audit (CDA)**

1. The audit records validation checklist for audit report I99-04 was not complete with regard to the content of the audit file. The checklist was properly completed.

2. Reporting requirements for Measuring and Test Equipment (M&TE) found to be out of calibration, as specified in WP10-AD.01, were not being followed. The procedure was revised to reflect actual practice.
3. Engineering Change Orders (ECOs) for temporary modifications were not being signed by the cognizant engineer, as required by WP09-CN3007, when the temporary modification was installed. The procedure was revised to delete this requirement.
4. Procedure WP15-PS3103 incorrectly identified records produced during the performance of the procedure. The procedure was revised.
5. Procedure WP15-PS3002 stated that records generated by the procedure were maintained electronically but, in practice, hardcopy records were being maintained. The procedure was revised to reflect actual practice.
6. Corrections to quality records that were not signed and dated as required were identified in several procurement files. These records were corrected.
7. Procedure WP15-PS3003 required that repeat NCRs (two similar occurrences within a six-month period) be evaluated by the NCR coordinator for possible documentation as a CAR. There had been several similar weld cracks on TRUPACT II trailers within a six-month period, but no evaluation had been documented. An evaluation was documented and placed in the NCR files.

### **6.3 Observations**

1. The fault tree analyses and the system lineup checklists for each plant system were initially developed and approved in the 1996 time frame. Both documents exhibit the 1996 approval signatures and are considered to be adequate and acceptable for extended use. The fault tree analyses and system checklists are based on the plant configuration and systems as defined in 1996. There is no defined process for update of either document because of system modifications or plant design modifications. In addition, the procedure is unclear about the process of reviewing completed checklists and/or the need for utilizing the results of the previous system verifications while preparing future checklists. This could result in the use of outdated system lineup checklists for verification of plant configuration. The process for updating system lineup checklists should be clarified.
2. The Waste Handling Operations organization allows cross-trained individuals to sign off any of the positions for which they are qualified. Consequently, many completed waste processing forms (QA records) show one individual signing off for performing a step as the Waste Handler (WH), verifying the step is completed by signing off as the Waste Handling Engineer (WHE) and signing off for validation of the completed

data as the WHE. The subject procedures use key words like “validation” and “inspection” which are normally performed by individuals other than those who perform or are responsible for the work. Allowing individuals to sign off on a QA Record as an action performer, a verifier that the action was performed, and then sign for validation of the data on that document is a questionable practice.

3. The waste stream profile form (WSPF) review checklists for three WSPFs were marked “conditionally acceptable” pending more information being supplied by the generator sites. When additional information was supplied, the checklists were approved unconditionally. The procedure, WP05-WA.03 allows only two options, to mark the checklist “acceptable” or “unacceptable”. The practice of marking the checklists “conditionally acceptable” occurred on the first three WSPFs reviewed and has not occurred on more recently reviewed checklists. Deviations from the approved procedure could lead to deficiencies in the future.

#### **6.4 Recommendations**

1. Procedure WP13-QA3003 requires that corrective action plans be submitted to the QA organization within ten working days of the issuance of a CAR. While this requirement is intended to facilitate timely corrective action, ten days is somewhat arbitrary and may not be reasonable for all situations requiring corrective action. One instance was found during the audit where more than ten days elapsed before the corrective action plan was submitted to QA. Timely corrective action was still achieved in this case. It is recommended that WID consider a more flexible requirement that takes into account the complexity of required corrective actions in establishing due dates for corrective action plans.
2. Procedure WP09-CN3021 contains a “NOTE” following paragraph 5.3 concerning using work orders to change the equipment register. The note as written could lead to an error regarding the type of work order required when changing an item listed on the equipment register. It is recommended that the note be further clarified to indicate when the actual practice of changing components utilizing a Type C work order is allowed.
3. A “Best Available Copy Stamp” is being used on documents that are completely legible. Recommend that use of this stamp be restricted to documents that have legibility problems.
4. The processes for soliciting input and obtaining reviews from WID organizations for material included in the BECR is not formalized. It is recommended that WID perform this process in a more structured manner.

## **6.5 Exemplary Practice**

1. WID procedures are now electronically available for users through the Q&MIS™ Electronic Document Control System. The system allows only current controlled procedures to be used. The system is user friendly. Document Services, the organization responsible for the Q&MIS™, provides users with assistance when needed. The implementation of this system was considered to be an exemplary practice.

## **7.0 LIST OF ATTACHMENTS**

- Attachment 1: Personnel Contacted During the Audit
- Attachment 2: Procedures Audited
- Attachment 3: Summary Table of Audit Results

**PERSONNEL CONTACTED DURING THE AUDIT**

<b>WID/D&amp;Z PERSONNEL CONTACTED</b>				
<b>NAME</b>	<b>ORGANIZATION</b>	<b>PREAUDIT MEETING</b>	<b>CONTACTED DURING AUDIT</b>	<b>POST AUDIT MEETING</b>
Abernathy, Angela	PSST		X	
Allen, Bill	WID QA	X	X	
Allen, Royce	WID Design & Construction	X		
Alonen, Allen	D&Z/PRS		X	
Azzinaro, Sam	WID Procurement		X	
Barnett, Don	WID Configuration Mgmt.		X	
Batchelder, Terry	WID Geotechnical Eng.		X	
Bellows, Hardy	WID Facility Operations		X	
Bickerstaff, Sheila	D&Z/PRS		X	
Biscaino, Debra	D&Z/PRS		X	
Boatwright, Wesley	WID		X	
Booth, Shane	WID		X	
Bradley, Bernard	WID Facility Ops		X	
Bradley, Sue	WID Controller		X	
Brewer, Danny	WID Work Control		X	
Britain, Randy	WID Waste Handling	X	X	X
Carrasco, Rey	WID Geotechnical Eng.		X	
Carrasco, Ruben	WID Hazardous Waste Ops	X	X	
Cassingham, Scott	WID HR		X	
Charlet, Pat	D&Z/PRS		X	
Chavez, Rick	WID Hazardous Waste Ops	X	X	
Clem, Penny	WID ES&H	X		
Cox, Nikki	WID QA	X		

<b>WID/D&amp;Z PERSONNEL CONTACTED</b>				
<b>NAME</b>	<b>ORGANIZATION</b>	<b>PREAUDIT MEETING</b>	<b>CONTACTED DURING AUDIT</b>	<b>POST AUDIT MEETING</b>
Dalton, Linda Jo	WID ES&H Integration	X	X	X
Donovan, Kevin	WID ES&H	X	X	
Dugger, Priscilla	WID Procurement		X	
Espinoza, Lolly	D&Z/PRS		X	
Estes, Dawn	WID QA		X	
Ferguson, Tom	WID QA	X	X	X
Fox, Michael	D&Z PRS	X	X	
Friend, Mark	WID		X	
Galle, Lane	WID QA		X	
Garcia, John	WID Engineering	X	X	
Garcia, Teddy	WH Hoist Ops.		X	
Gran, John	WID ES&H	X	X	
Gries, Ron	WID Technical Training		X	
Guillermo, Koreen	WID RCRA Permitting		X	
Haar, Dave	WID Engineering		X	X
Jackson, Kim	WID Facility Operations		X	
James, Mike	WH Hoist Ops		X	
Jones, Stewart	WID ES&H		X	X
Kirkes, B.	WID Technical Training			X
Kouba, Steve	WID ES&H	X	X	
Krause, Sandi	WID Configuration Mgmt.		X	
Langsteiner, Bruce	WID QA		X	X
Lee, John	WID General Managers Off.	X	X	
Legarreta, Jose	WID Controller	X	X	X

<b>WID/D&amp;Z PERSONNEL CONTACTED</b>				
<b>NAME</b>	<b>ORGANIZATION</b>	<b>PREAUDIT MEETING</b>	<b>CONTACTED DURING AUDIT</b>	<b>POST AUDIT MEETING</b>
Lipscomb, Michael	WID QA	X	X	X
Mikus, Ken	WID WWIS Data Administrator		X	
Miller, Darrell	WID Operations		X	
Morissette, Ann	WID Controller	X	X	
Nance, Candace	WID		X	
O'Conner, Jim	WID Maintenance		X	
Patterson, Terry	WID Operations	X	X	
Porter, Larry	WID Operations	X	X	
Porter, Philip	WID Operations		X	
Reber, David	WID Operations			X
Richardson, Ron	WID ES&H		X	
Roback, Billy	WID Stores		X	
Rodriquez, Doris	D&Z/PRS		X	
Rust, Martha	WID Controller	X		
Schoen, D. L.	WID U/G Ops		X	
Sethi, Subhash	WID Operations			X
Shafer, Heather	WID Document Services		X	
Simpson, Mike	CTAC QA		X	
Sleeman, Ted	WID Dosimetry		X	
Suggs, Craig	WID Operations		X	X
Treadway, Wayne	WID Design & Construction	X	X	
Trefren, Mike	WID QA		X	
Weyerman, C. Wade	WID WH Ops.		X	
Whatley, Miriam	WID ES&H		X	

<b>WID/D&amp;Z PERSONNEL CONTACTED</b>				
<b>NAME</b>	<b>ORGANIZATION</b>	<b>PREAUDIT MEETING</b>	<b>CONTACTED DURING AUDIT</b>	<b>POST AUDIT MEETING</b>
White, Roy	WID		X	
Williams, George	WID QA		X	
Yeager, Crystal	WID Operations		X	
Yeager, Sherry	WID Ops		X	
Youngerman, Steve	WID Operations	X		



Documents Reviewed During Audit 99-14

Activities	Applicable WID Documents
Quality Assurance Program and Organization	WID QAPD WP13-1, Rev 16, CN 6, <i>Quality Assurance Program Description</i>
Personnel Qualification and Training	WP14-TR.01, Rev 2, PCN 0, <i>WIPP Training Program</i> WP14-TR3307, Rev 1, PCN 1, <i>Qualification Programs</i>
Quality Improvement	MP1.2, Rev 1, PCN 0, <i>Work Suspension and Stop-Work Direction</i> WP13-QA3001, Rev 1, PCN 0, <i>Issuing Hold Tags</i> WP13-QA3003, Rev 2, PCN 4, <i>Corrective Actions Program</i> WP13-QA3004, Rev 0, PCN 1, <i>Nonconformance Report</i> WP15-MD3102, Rev 1, PCN 0, <i>Event Investigation and Root Cause Analysis</i> WP13-QA.04, Rev 1, PCN 0, <i>Q&amp;RA Administrative Program</i>
Documents	MC9.14, Rev 5, PCN 0, <i>Document Review Committee</i> WP15-PS3002, Rev 3, PCN 0, <i>Review, Approval, ;and Cancellation of WID Controlled Documents</i> WP15-PS3003, Rev 1, PCN 0, <i>Document Change Process</i> WP15-PS3103, Rev 2, PCN 0, <i>Document Distribution</i>
Records	WP15-PR, Rev 1, PCN 3, <i>Records Management Program</i> WP15-PR3002, Rev 1, PCN 1, <i>Records Filing, Inventorying, Scheduling, and Dispositioning</i> WP15-PR3003, Rev 1, PCN 1, <i>Disposal of Nonpermanent Records</i> WP15-PR3007, Rev 0, PCN 2, <i>Receipt of Records Boxes at CAO Records Holding Facility</i> WP15-PR3011, Rev 0, PCN 3, <i>Retrieving Records From the Carlsbad Area Office Records Holding Facility</i> WP15-PR3014, Rev 0, PCN 2, <i>Project Records Services Storage Configuration</i> WP15-PR3005, Rev 2, PCN 1, <i>Records Transfer and Retrieval</i> WP15-PR3006, Rev 0, PCN 3, <i>Records Inventory and Disposition Schedule Review and Approval</i> WP15-PR3013, Rev 0, PCN 2, <i>Destruction of Nonpermanent Records</i>

Documents Reviewed During Audit 99-14

Activities	Applicable WID Documents
Work Processes	WP04-AD3005, Rev 0, PCN 5, <i>Administrative Control of System Lineups</i> WP04-AD3011, Rev 2, PCN 4, <i>Equipment Tagout/Lockout</i> WP05-WH1011, Rev 2, PCN 2, <i>Surface Transuranic Mixed Waste Handling Area Inspections</i> WP05-WH1810, Rev 3, PCN 1, <i>Underground CH-TRU Waste Storage Area Inspections</i> WP10-2, Rev 2, PCN 0, <i>Maintenance Operations Instructions Manual</i> WP 10-WC3002, Rev 4, PCN 0, <i>Corrective Maintenance</i> WP 10-WC3004, Rev 4, PCN 0, <i>Preventive Maintenance</i> WP04-HO1003, Rev 2, PCN 2, <i>Waste Handling Hoist Operation</i> WP05-WH1011, Rev 4, PCN 0, <i>Waste Processing</i>
Design Control	WP09, Rev 2, PCN 8, <i>Engineering Conduct of Operations</i> WP09-9, Rev 4, PCN 0, <i>WID Operational Configuration Management Plan</i> WP09-CN3003, Rev 2, PCN 0, <i>As-Built Drawings: Process and Control</i> WP09-CN3007, Rev 1, PCN 5, <i>Engineering and Design Document Preparation and Change Control</i> WP09-CN3018, Rev 1, PCN 0, <i>Design Verification</i> WP09-CN3021, Rev 1, PCN 6, <i>Component Indices</i> WP09-CN3022, Rev 0, PCN 4, <i>Engineering Document Control and Distribution</i> WP09-CN3023, Rev 0, PCN 2, <i>Design Classification Determination</i> WP09-CN3024, Rev 1, PCN 4, <i>Configuration Management Board/Engineering Change Proposal</i> WP09-CN3031, Rev 0, PCN 1, <i>Engineering Calculations</i> WP 09-CN3034, Rev 1, PCN 0, <i>Configuration Management Determination</i>
Inspection and Testing	WP10-AD.01, Rev 0, PCN 1, <i>Metrology Program</i> WP10-AD3028, Rev 0, PCN 6, <i>Calibration and Control of Measurement and Test Equipment</i> WP10-AD3029, Rev 0, PCN 1, <i>Calibration and Control of Monitoring and Data Collection Equipment</i> WP10-AD3030, Rev 0, PCN 1, <i>Calibration Label Application and Control</i> WP13-QA1001, Rev 1, PCN 0, <i>Liquid Penetrant Examination -Visible Solvent Removable</i> WP13-QA1002, Rev 1, PCN 0, <i>Visual Inspection</i> WP13-QA1003, Rev 2, PCN 1, <i>Quality Assurance Inspections</i> WP13-QA1004, Rev 1, PCN 0, <i>Magnetic Particle Examination</i> WP09-SU.O1, Rev 0, PCN 1, <i>WIPP Start-Up Test Program</i>
Waste Stream Profile Forms	WP05-WA03, Rev 0, PCN 2, <i>Waste Stream Profile Form Review and Acceptance Program</i>

Documents Reviewed During Audit 99-14

<b>Activities</b>	<b>Applicable WID Documents</b>
Independent Assessment	WP13-QA.03, Rev 2, PCN 0, <i>Quality and Regulatory Assurance Department Assessment Program</i> WP02-PC.01, Rev 1, PCN 0, <i>WIPP RCRA-Specific Generator Site Waste Screening and Acceptance Program</i>
Radiological Controls Measuring and Test Equipment	WP12-HP1200, Rev 2, PCN 2, <i>Instrumentation and Calibration</i> WP12-HP1220, Rev 0, PCN 4, <i>Portable Contamination Detectors</i> WP12-HP1225, Rev 0, PCN 1, <i>Calibration of Continuous Air Monitors</i>
Procurement	WP12-DS1321, Rev 0, PCN 0, <i>Material Requisitions and Acceptance Testing</i> WP13-QA3012, Rev 2, PCN 0, <i>Supplier Evaluation/Qualification</i> WP15-PC3041, Rev 1, PCN 0, <i>Approval/Variation Request Processing</i> WP15-PC3042, Rev 0, PCN 0, <i>Credit Card Purchases</i> WP15-PC3609, Rev 3, PCN 0, <i>Preparation of Purchase Requisitions and Change Notices</i> WP15-PC3517, Rev 3, PCN 0, <i>Stores Inventory Control</i>

**CAO Audit A-99-14 Detail Summary**

Program Elements	Concern Classification				QA Evaluation		Technical
	CARs	CDAs	Obs	Rec	Adequacy	Implementation	Effectiveness
Organization and QA Program	99-087				M	S	E
Document Control	99-086	4,5		4	A	S	E
Training and Qualification		8			A	S	E
Records		6		3	A	S	E
Independent Assessment	99-083 99-084	1			A	M	E
Quality Improvement		7		1	A	S	E
Inspection and Testing	99-085	2			A	S	E
Procurement					A	S	E
Design Control	99-088	3		2	A	S	E
Work Processes			1,2,3		A	S	E
<b>TOTALS</b>	<b>6</b>	<b>8</b>	<b>3</b>	<b>4</b>	<b>A</b>	<b>S</b>	<b>E</b>

**Definitions**

E = Effective

S = Satisfactory

I = Indeterminate

M=Marginal

CAR = Corrective Action Report

CDA = Corrected During Audit

Obs=Observation

NE = Not Effective

Rec = Recommendation

A = Adequate

NA = Not Adequate