NYE COUNTY NUCLEAR WASTE REPOSITORY PROJECT OFFICE

QUALITY ADMINISTRATIVE PROCEDURE

TITLE: **Control of Nonconforming Items or Activities**	REVISION: **2** DATE: **9-17-08** PAGE: **1 of 6**
PROCEDURE NUMBER: **QAP-15.1**	SUPERSEDES: **Revision 1, 3-31-04**
APPROVAL Director 9/18/08 Date	CONCURRENCE Geoscience Manager 9/17/08 Date Quality Assurance Officer 9/17/08 Date

1.0 PURPOSE

This quality administrative procedure (QAP) describes Nye County Nuclear Waste Repository Project Office (NWRPO) requirements and responsibilities for ensuring that items or activities that do not conform to project specifications and/or procedures are prevented from being used inadvertently in NWRPO technical programs.

2.0 APPLICABILITY

This QAP applies to quality-affecting items and activities that do not conform to specified requirements of NWRPO technical programs.

3.0 DEFINITIONS

3.1 ***Condition adverse to quality (CAQ)***—a nonconforming condition that, if left uncorrected, will have a significant negative effect on the quality of the NWRPO technical program or the safety of personnel.

3.2 ***Corrective action***—action taken to correct and prevent the recurrence of a nonconformance.

3.3 ***Nonconformance***—a deficiency in characteristic, documentation, or procedure that renders the quality of an item or activity unacceptable or indeterminate.

3.4 ***Quality administrative procedure***—a procedure developed to implement the quality assurance (QA) requirements described in the QA Program Plan (QAPP).

3.5 ***Quality Assurance Program Plan***—the controlled plan that outlines NWRPO QA requirements, which are based principally on the applicable portions of the requirements set forth by the U.S. Nuclear Regulatory Commission and the American National Standards Institute for nuclear power plants, as adapted for a nuclear waste repository.

4.0 RESPONSIBILITIES

All NWRPO personnel are responsible for reporting nonconformances to the responsible Principal Investigator (PI), QA Officer (QAO), and Geoscience Manager (GSM).

4.1 Director

The Director or designee is responsible for approving this QAP.

4.2 Quality Assurance Officer

The QAO is responsible for coordinating discussions to determine whether the item or activity is a nonconformance, logging the verified nonconformance in the nonconformance/corrective action (NC/CA) logbook maintained in the QARC, evaluating the NC/CA logbook to identify possible adverse trends, and reporting such trends to the Director and the GSM.

4.3 Geoscience Manager

The GSM is responsible for participating in nonconformance discussions and ensuring that the PI addresses nonconformances as described in this QAP.

4.4 Principal Investigator

The PI or designee is responsible for segregating and tagging nonconforming material, informing impacted personnel of nonconformances, proposing corrective action(s) and associated schedule, and participating in the nonconformance discussions.

4.5 Discoverer

The discoverer of the nonconformance is responsible for reporting the nonconformance to the PI, GSM, and QAO and participating in the nonconformance discussions.

5.0 PROCESS

5.1 Identification of Nonconformance and Proposed Corrective Action

Upon discovery of a potential nonconformance, the following steps shall be taken:

- The discoverer notifies the PI, GSM and QAO of the potential nonconformance in an email or memo. If the nonconformance is discovered in the field, the GSM shall be notified by phone and documentation made in the scientific notebook.
- The names of the discoverer and responsible PI and a brief description of the nonconformance are provided in communications with the PI, GSM, and QAO.
- A proposed corrective action and schedule are provided by the PI and/or the GSM and submitted to the QAO.
- The nonconformance, proposed corrective action, and schedule are documented in the NC/CA logbook by the QAO. The nonconformance and associated corrective action shall be assigned a unique number consisting of the letters "NC" for nonconformance, 2 numbers indicating the nonconformance in sequential order, and the year of the occurrence (i.e. NC-01-2008).

5.2 Condition Adverse to Quality

If a nonconformance is deemed to be a CAQ, the following steps shall be taken:

- The QAO verbally notifies the Director or designee immediately and GSM, and follows up with a written notification.
- The GSM, PI or designee immediately stops all work associated with the CAQ, and a written notification of the action is sent to the and QAO.
- The QAO, in consultation with the Director and attendees of the nonconformance discussions, determines whether the stopped work is to remain halted, immediately communicates this decision verbally to the responsible PI, and follows up with a written notification.
- The PI ensures that the decision of the QAO is implemented.

5.3 Tagging of Nonconforming Items

Upon confirmation of a nonconforming item, the PI or designee shall ensure that the nonconformance is clearly identified by attaching a tag to the item, marking it, or using another appropriate method and isolating it immediately. If a nonconformance tag is used, the name of the PI and the nonconformance number shall be specified on the tag (Attachment 1).

If the nonconformance is an activity, the PI shall inform impacted personnel via a memo copied to the QAO and GSM.

5.4 Nonconformance Discussions

The QAO shall coordinate discussions with the discoverer, PI, and GSM to decide whether the specified item or activity is a nonconformance. The discussions shall be held soon after discovery, unless the discoverer believes that the potential nonconformance is a CAQ, in which case the discussions shall be convened as soon as possible to decide whether work shall remain stopped until corrective action can be implemented.

If it is determined during discussions that the item or activity in question is not a nonconformance, no further action is required.

If it is determined that the item or activity is a nonconformance, the QAO will document it as such in the NC/CA logbook, as described in section 5.5. Actions described in QAP-16.1, *Corrective Action*, shall then be implemented.

5.5 Logging a Nonconformance

The following shall be logged by the QAO in the NC/CA logbook:

- Date of discovery
- Names of the discoverer and responsible PI
- Brief description of the nonconformance
- Proposed corrective action and schedule
- Proposed date of the required follow-up surveillance
- Proposed date of completion of the follow-up action

The QAO shall review the NC/CA logbook semi-annually and sign it to verify that it has been reviewed. In addition, the QAO shall track all nonconformances and prepare an annual report for the Director or designee indicating possible trends.

6.0 RECORDS

Documents generated by this QAP are QA records and shall be submitted to the QARC by the responsible individual. Prior to submittal, the sender shall ensure that each document is complete, legible, and adequately identifiable. Control of these records shall be in accordance with QAP-17.1, *Records Management*.

The QA records generated by this QAP include the following:

- Copy of relevant pages of the nonconformance /corrective action logbook
- All related correspondence

7.0 REFERENCES

QAP-16.1, *Corrective Action*. Quality Administrative Procedure. Nye County Nuclear Waste Repository Project Office (NWRPO). Pahrump, Nevada.

_QAP-17.1, *Records Management*.

QAPP, *Nye County Nuclear Waste Repository Project Office Quality Assurance Program Plan*. Quality Assurance Program Plan. NWRPO. Pahrump, Nevada.

8.0 ATTACHMENTS

Attachment 1 Nonconformance Tag

Attachment 1
Nonconformance Tag

Form QAP-15-1-1 Rev 1
9-17-08

NUCLEAR WASTE REPOSITORY PROJECT OFFICE

NONCONFORMING ITEM

NC No. _____

DO NOT USE

Without specific approval from:

_____
Principal Investigator