NYE COUNTY NUCLEAR WASTE REPOSITORY PROJECT OFFICE

QUALITY ADMINISTRATIVE PROCEDURE

TITLE: **Control of Nonconforming Items or Activities**	REVISION: **1** DATE: **3-31-04** PAGE: **1 of 7**
PROCEDURE NUMBER: **QAP-15.1**	SUPERSEDES: **Revision 0, 9-30-95**
APPROVAL Project Manager 4-5-04 Date	CONCURRENCE On-Site Geotechnical Representative 3/31/04 Date Quality Assurance Officer 3/28/04 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.

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 On-Site Geotechnical Representative (OSGR).

4.1 Project Manager

The Project Manager (PM) or designee is responsible for approving this QAP.

4.2 Quality Assurance Officer

The QAO is responsible for holding a conference to determine whether the item or activity is a nonconformance, verifying that the Nonconformance Report (NCR) is complete and has been submitted to the QA records center (QARC), logging the verified nonconformance in the nonconformance/corrective action logbook, evaluating NCRs and the logbook to identify possible adverse trends, and reporting such trends to the PM.

4.3 On-Site Geotechnical Representative

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

4.4 Principal Investigator

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

4.5 Discoverer

The discoverer of the nonconformance is responsible for preparing a Nonconformance Report (NCR) and participating in the nonconformance conference (Attachment 1).

5.0 PROCESS

5.1 Identification of Nonconformance and Proposed Corrective Action

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

- An NCR is filled out by the discoverer and submitted within two days of discovery to the PI, OSGR and QAO, unless the discoverer believes the potential nonconformance to be a CAQ, in which case the QAO is contacted as soon as possible after discovery.
- The names of the discoverer and responsible PI and a brief description of the nonconformance are provided in the appropriate sections of the NCR.
- A proposed corrective action and schedule are provided by the PI in the appropriate section of the NCR.

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 PM or designee immediately, and follows up with a written notification.
- The PI or designee immediately stops all work associated with the CAQ, with a written notification of the action to the OSGR and QAO.
- The QAO, in consultation with the PM and attendees of the nonconformance conference, 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 receipt of an NCR for an item, the PI 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 2).

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

5.4 Nonconformance Conference

The QAO shall arrange a conference with the discoverer, PI, and OSGR to decide whether the specified item or activity is a nonconformance. The conference shall be held no later than two weeks after discovery, unless the discoverer believes that the potential nonconformance is a CAQ, in which case the conference shall be convened as soon as possible to decide whether work shall remain stopped until corrective action implemented.

If it is determined at the conference that the item or activity in question is not a nonconformance, the box beside “Not a nonconformance” shall be checked and the NCR shall be signed and dated by the discoverer, PI, OSGR, and QAO. The completed NCR shall be sent to the QARC by the QAO. The PI shall appropriately address and close the issue that prompted the NCR.

If it is determined that the item or activity is a nonconformance, the box beside either “Nonconformance” or “CAQ” shall be checked and the NCR shall be signed and dated by the discoverer, PI, OSGR, and QAO. Actions described in QAP-16.1, *Corrective Action*, shall then be implemented.

5.5 Logging a Nonconformance

Based on the NCR, the following shall be logged by the QAO in a nonconformance/ corrective action 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 or audit.
- Proposed date of completion of the follow-up action.

The QAO shall review the 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 PM 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:

- Completed NCR original.
- Copy of relevant pages of the nonconformance /corrective action logbook.
- All related correspondence.

The above records shall be combined with records generated in QAP-16.1, if any, to form an NCR/Corrective Action Report data package, and submitted to the QARC by the QAO.

7.0 REFERENCES

QAP-16.1, *Corrective Action*.

QAP-17.1, *Records Management*.

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

8.0 ATTACHMENTS

Attachment 1 Nonconformance Report

Attachment 2 Nonconformance Tag

Attachment 1
Nonconformance Report

Form QAP-15.1-1 Rev 0
03-31-04

Nye County Nuclear Waste Repository Project Office **NONCONFORMANCE REPORT**	**NCR No.** (issued by the QAO)

Discoverer	
Brief description of potentially nonconforming item or activity. Use a continuation sheet, if necessary.	
Principal Investigator	
Proposed corrective action and schedule. Use a continuation sheet, if necessary.	
Date(s) of above item or activity	_____/_____/_____
Date of conference	_____/_____/_____
Conference attendees	
This item or activity is	☐ Not a nonconformance ☐ A nonconformance ☐ An unusual occurrence or condition affecting quality (CAQ)
Discoverer	Signature _____ Date _____
Quality Assurance Officer	Signature _____ Date _____
Principal Investigator	Signature _____ Date _____
On-Site Geotechnical Representative	Signature _____ Date _____

Attachment 2
Nonconformance Tag

Form QAP-15-1-2 Rev 0
3-31-04

NUCLEAR WASTE REPOSITORY PROJECT OFFICE

NONCONFORMING ITEM

NCR No. _____

○ **DO NOT USE**

Without specific approval from:

_____
Principal Investigator