



## Office of Environmental Management

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### Administrative Procedure

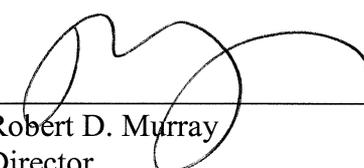
### *Surveillances*

### AP-2.2Q, Revision 1

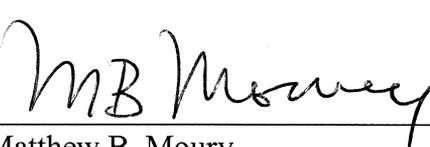
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## 1.0 PURPOSE

The purpose of this procedure is to establish responsibilities and processes for the scheduling, planning, performing, and documenting Quality Assurance (QA) surveillances of the High-Level Waste (HLW) and Used Nuclear Fuel (UNF) programs.

## 2.0 SCOPE

The scope of this procedure is to verify effective implementation through the review or observation of specific activities related to the High-Level Waste (HLW) and Used Nuclear Fuel (UNF) programs.

## 3.0 APPLICABILITY

This procedure applies to Environmental Management (EM) personnel and contractors that participate in activities associated with the HLW and UNF Oversight Program.

## 4.0 REQUIREMENTS and REFERENCES

### 4.1 Requirements

4.1.1 *Quality Assurance Requirements and Description (QARD)*, DOE/RW-0333P, Revision 20

4.1.2 EM-QA-002, *Quality Assurance Program Plan (QAPP)*

### 4.2 References

4.2.1 AP-2.1Q, *Qualification of Personnel*

4.2.2 AP-16.1Q, *Corrective Action*

4.2.3 AP-17.1Q, *Quality Assurance Records*

## 5.0 DEFINITIONS

N/A

## 6.0 GENERAL RESPONSIBILITIES

### 6.1 Director, Office of Standards and Quality Assurance

6.1.1 Responsible for the preparation, change, and approval of this procedure.

6.1.2 Review, approve, and issue the Surveillance Notifications.

- 6.1.3 Review, approve, and issue the Surveillance Report and the Transmittal Letter.
- 6.2 QA Lead for the HLW and UNF Oversight Program
  - 6.2.1 Responsible for the selection of the Surveillance Team Leader (STL).
  - 6.2.2 Responsible for the assignment of Surveillance Number designation.
- 6.3 Environmental Management Consolidated Business Center (EMCBC) Coordinator, Office of Technical Support and Asset Management.
  - 6.3.1 Responsible for maintaining QA Records associated with this procedure.
- 6.4 STL
  - 6.4.1 Responsible for the selection of the Surveillance Team Members and Technical Specialists.
  - 6.4.2 Development of Surveillance Notifications.
  - 6.4.3 Development of Surveillance Report and the Transmittal Letter

## 7.0 GENERAL INFORMATION

Surveillance is a planned and documented assessment of programs, processes, systems, or activities performed to determine compliance to requirements and to identify systemic issues, potential risk, emerging issues, and areas for improvement. The conduct of surveillance is less formal than an audit and usually maintains a more focused line of inquiry.

## 8.0 PROCEDURE

### 8.1 Surveillance Team Selection

- 8.1.1 The QA Lead assigns the STL to manage and conduct the surveillance as delineated in the HLW and UNF Annual Audit and Surveillance Schedule.
- 8.1.2 The QA Lead shall ensure that the STL has been qualified as an Audit Team Leader per the AP-2.1Q, *Qualification of Personnel*.
- 8.1.3 The STL Select Surveillance Team Member(s) or Technical Specialist(s) as needed to meet the scope and complexity of the surveillance.
- 8.1.4 Prior to performing the surveillance, the STL shall verify that the Surveillance Team Member(s) are qualified as auditors per AP-2.1Q,

*Qualification of Personnel.* Technical Specialist(s) shall be qualified as specified in AP-2.1Q, *Qualification of Personnel.*

8.1.5 The STL shall ensure that the selected personnel for conducting a surveillance meet the following criteria:

- Have sufficient authority and organizational freedom to make the process meaningful and effective.
- Will be independent of any direct responsibility for performing the work that is to be assessed by the surveillance.
- Will have experience and training commensurate with the scope, complexity, or special nature of the activities under the surveillance.

8.1.6 The Director shall provide the surveillance team the resources necessary to implement the surveillance.

## 8.2 Surveillance Notification

8.2.1 The STL should contact the management of the organization to be evaluated by the surveillance and discuss the following:

- The scope of the surveillance.
- The STL shall confirm activity schedules and the availability of personnel from the organization scheduled for surveillance
- Request a point of contact for the surveillance.

8.2.2 Prepare a Surveillance Notification Memorandum from the Director containing the following the elements

- Surveillance scope
- Surveillance schedule
- Activities to be evaluated
- A point of contact for the surveillance.
- Request access to the areas of activity, related documentation, and personnel.
- Request for logistical support (e.g., Meeting facilities for team caucus as well as separate management debriefings, workspace for

the surveillance team, access to computer stations, copy machines, telephone, or fax, etc.)

8.2.3 Submit Surveillance Notification Memorandum to the Director for review, approval, and issuance.

8.2.4 The Director shall review, approve, and sign the Surveillance Notification memorandum.

8.2.5 The Director shall Issue the notification memorandum to the organization subject to the surveillance

### 8.3 Preparing for Surveillance Activities

8.3.1 The STL shall identify and obtain the documents appropriate to the assigned surveillance.

8.3.2 The STL shall assign to the surveillance team member(s), the activities and criteria from the scope of the surveillance as applicable. When deemed necessary, by the STL, direct team members to prepare a Form 18.1-1, *Quality Assurance Audit Checklist* and use it as guidance during the surveillance.

### 8.4 Surveillance Performance

8.4.1 The STL shall initiate the surveillance at the organization with an entrance meeting, if requested by the organization. Give a brief overview of the surveillance scope, the schedule, and how the surveillance will be conducted.

8.4.2 The STL shall direct the surveillance team using the following methods for inclusion into the surveillance report, as applicable:

- Examine objective evidence for proper and effective implementation of the QARD
- Interview Personnel
- Review process objectives and measurement criteria
- Review records
- Observe activities, personnel performance, in-process analysis, and testing

- Determine the adequacy and effectiveness of implementation of the QARD

8.4.3 The STL shall coordinate the preparation and issuance of Corrective Action Reports (CARs) per AP-16.1Q, *Corrective Action*.

8.4.4 If a condition is identified as being a significant condition adverse to quality during the course of the surveillance the STL shall brief the organization's management as soon as practical.

#### 8.5 Completing the Surveillance Report

8.5.1 The STL shall document the results of the surveillance using Form 2.2-1 *Surveillance Report* in the report in accordance with Attachment A – Surveillance Report Instructions.

8.5.2 The STL shall process any CARs in accordance with AP-16.1Q, *Corrective Action*.

8.5.3 The STL shall sign the surveillance report, prepare a transmittal memo and submit to the Director for approval and issuance.

#### 8.6 Surveillance Report Issuance

The Director shall approve and sign the surveillance report, and issue the surveillance report and transmittal memo to the responsible organization's management and provide copies to the appropriate representatives to the interested organizations.

### 9.0 RECORDS MAINTENANCE

Records listed shall be collected and submitted to the EMCBC Coordinator in accordance with AP-17.1Q, *Quality Assurance Records*, as individual records or included in a records package, as specified.

#### 9.1 QA Records

9.1.1 Lifetime Records

None

9.1.2 Nonpermanent Records

9.1.2.1 Surveillance Notification Memorandum

9.1.2.2 Surveillance Report

9.1.2.3 Completed, if any, QA Checklists

9.2 Non QA Records

9.2.1 Attendance Sheets

9.2.2 Surveillance Report Transmittal Letter

10.0 FORMS USED

Form 18.1-1, *Quality Assurance Audit Checklist*

Form 18.1-2, *Attendance Sheet*

Form 2.2-1, *Surveillance Report*

11.0 ATTACHMENTS

N/A

## Form 2.2.1 Surveillance Report

1. Report Number	2. Date(s) of Surveillance	
3. Organization Responsible for Product, Process, or Activity	4. Responsible Manager	
5. Product, Process, Activity Assessed		
6. Existing Condition Report(s) Relevant to Block 5		
7. Description of Activity/Characteristics/Attribute Assessed		
8. Criteria Used in Evaluation (e.g., procedure requirements)		
9. Identify Personnel Contacted		
10. Conclusions		
11. Condition Report(s) Initiated		
12. Surveillance Team		
13. Surveillance Team Leader		
_____	_____	_____
Printed Name	Signature	Date
14. Director of Standards and Quality Assurance		
_____	_____	_____
Printed Name	Signature	Date

**Form 2.2.1 – Surveillance Report Instructions**

Format is optional; however, the following elements must be addressed in the surveillance report, as applicable. If using an alternate format, elements must be combined, as necessary.

1. Number assigned for the surveillance obtained from either the assessments schedule or the QA Lead, and title of the surveillance.
2. Include the dates of the surveillance occurrence.
3. Organization responsible for the product, process, or activity that is being assessed in the surveillance.
4. Manager of the organization identified in block 3 that is being assessed in the surveillance.
5. Describe the scope of the surveillance in detail, including product, process, or activity assessed in the surveillance.
6. Provide discussion of the verification of the effectiveness of previously completed corrective actions, when applicable.
7. Provide a detailed description of the observed activities, reviewed objective evidence, and the evaluation of QARD sections or procedures as applicable.
8. Identify or reference the criteria considered during the surveillance (QARD sections, procedures, specifications, drawings, etc.) as applicable.
9. Identify persons contacted during the surveillance by name and organization.
10. State conclusions resulting from the surveillance. When appropriate to the scope of the surveillance, include statements in relation to the adequacy of the requirements, their implementation, and the effectiveness of implementation.
11. Identify each Condition Report initiated during the surveillance by number and provide a summary of each (if none, enter N/A).
12. List the surveillance team member(s)
13. The name and signature of the STL and date signed.
14. The name and signature of the Director and date signed.

**Form 5.1-1 – Record of Revision**

DOCUMENT: AP-2.2Q, *Surveillances*

<b>Revision Number</b>	<b>Description of Changes</b>	<b>Revision on Pages</b>	<b>Effective Date</b>
0	Original	All	04/27/2011
1	General Revision	All	12/14/2012