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CCP-CM-001

Revision 3

CCP
Equipment Change Authorization and Documentation

EFFECTIVE DATE: 12/11/2008

D. K. Ploetz

PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
0	05/25/2005	Initial issue.
1	12/20/2005	Changes to incorporate field comments to support CCP project office and the Host sites.
2	06/09/2006	Changes to add Configuration Management Engineers responsibilities and incorporate USQ screening into the equipment change process. Also quantified CCP's core areas of expertise and who to involve when performing work outside this area.
3	12/11/2008	Revised to clarify the use of the Host site's Unreviewed Safety Question (USQ) or safety analysis process and to improve the flow of the procedure.

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1.0 PURPOSE

The purpose of this procedure is to describe the Central Characterization Project (CCP) requirements and responsibilities pertaining to change control under CCP's configuration management (CM) for Mobile Characterization Units (MCU).

1.1 Scope

This procedure applies to characterization equipment under CCP's CM program. This includes vendor owned equipment and government furnished equipment operated by Washington TRU Solutions (WTS) or its subcontractors for the U.S. Department of Energy (DOE).

This procedure describes the method for requesting and authorizing changes to characterization equipment. This procedure applies to equipment changes at Host sites initiated by CCP or equipment changes affecting CCP operated equipment initiated by the Host site's maintenance program. This procedure DOES **NOT** apply to like-for-like equipment repairs that are conducted under the Host site's Work Control Program nor does it apply to equivalent equipment changes conducted under the Host site's Work Control Program. Equivalent changes are hardware changes that:

- Continue to meet the design requirements for the equipment
- Meet all interface requirements, and
- DO **NOT** impact the safety basis

2.0 REQUIREMENTS

2.1 References

Baseline Documents

- DOE-CBFO-94-1012, *U.S. Department Of Energy Carlsbad Field Office Quality Assurance Program Document* (QAPD)
- DOE-STD-1073-2003, *Configuration Management*
- CCP-PO-005, *CCP Conduct of Operations*
- CCP-PO-026, *CCP Configuration Management Plan*

Referenced Documents

- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*
- CCP-QP-008, *CCP Records Management*
- CCP-QP-010, *CCP Document Preparation, Approval and Control*
- CCP-QP-015, *CCP Procurement*
- DOE/WIPP 01-3187, *Quality Assurance Program Plan for TRUPACT-II Gas Generation Test Program*
- DOE/WIPP-02-3122, *Contact-Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*
- DOE/WIPP 02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*
- DOE/WIPP 06-3345, *Waste Isolation Pilot Plant Flammable Gas Analysis*
- NM4890139088-TSDF, *Waste Isolation Pilot Plant Hazardous Waste Facility Permit,* Attachments B-B6*, Waste Analysis Plan*
- U. S. Department of Energy, *Contact-Handled Transuranic Waste Authorized Methods for Payload Control* (CH-TRAMPAC), Carlsbad Field Office, Carlsbad, NM

3.0 RESPONSIBILITIES

3.1 Initiator

3.1.1 Develops all proposed equipment change/modification requests and provides them to the Vendor Project Manager (VPM) using Attachment 1, CCP Characterization Equipment Change Authorization.

3.2 Configuration Management Coordinator (CMC)

3.2.1 Reviews Attachment 1 for completeness.

3.2.2 With input from the Configuration Management Engineer (CME), coordinates the determination of appropriate reviewers for Attachment 1.

3.2.3 Coordinates the reviews of changes or modifications to characterization equipment.

3.2.4 Working with the CME, obtains appropriate approvals for equipment changes or modifications.

3.2.5 Ensures technical documentation is maintained on any equipment changes or modifications.

3.3 CCP Vendor Project Manager (VPM)

3.3.1 Completes the screening impacts of the proposed change using Attachment 1.

3.3.2 Coordinates with the CME to implement approved changes.

3.4 Site Project Manager (SPM)

3.4.1 Reviews the requested change and any accompanying documentation to determine if the change can be implemented without impacting safe operations, the certification status of the equipment, or causing a violation of CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan,* CCP-PO-002, *CCP Transuranic Waste Certification Plan,* or CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC).*

3.4.2 Documents comments in Section A2 of Attachment 1, **AND/OR** attaches comments to Attachment 1.

3.4.3 Documents approval of proposed change by signing and dating Section A2 of Attachment 1.

3.4.4 Supports CME/CMC in resolving comments with the designated reviewers.

3.5 Subcontract Technical Representative (STR)

3.5.1 Ensures that the Host site Documented Safety Analysis (DSA) is not violated by a modification as determined by the Host site's Unreviewed Safety Question (USQ) process or applicable Host Site Safety Analysis process.

3.5.2 Ensures that any changes required to the Host site DSA are approved through the Host site's approval process.

3.6 CCP Project Manager (PM)

3.6.1 Resolves comments that cannot be resolved between the designated reviewer and CME.

3.6.2 Approves equipment modifications at the Host sites under the CCP Project Manager's (PM) control.

3.6.3 Assists in the determination of training required due to equipment changes or modifications identified in this procedure.

3.7 CCP Manager

3.7.1 Ensures CCP/site roles and responsibilities are clearly defined in Site Interface documents, including CM.

3.7.2 Provides comment resolution on issues from reviewers which cannot be resolved at a lower level of management.

3.8 CCP Training

3.8.1 Provides training as determined during the review process for the change to equipment.

3.9 Configuration Management Engineer (CME)

3.9.1 Reviews proposed equipment changes or modifications.

3.9.2 Resolves comments from designated reviewers.

3.9.3 Coordinates with the CMC, SPM, CCP Training, the VPM, and the Host site to implement approved changes. The CME may coordinate and consult with other WIPP subject matter experts (SMEs) (i.e., Radiological Engineer), as necessary.

3.9.4 Assists CMC in determining appropriate reviewers for Attachment 1.

3.9.5 Coordinates with Host site STR to complete USQ process.

3.10 CCP Quality Assurance (QA)

3.10.1 Approves work that requires equipment design, fabrication, refurbishment, or modification to ensure that all QA requirements have been met. See Section 1.1 for outside support requirements.

3.11 Designated Reviewer

3.11.1 Reviews the requested change and any accompanying documentation to determine if the change will work as requested and can be implemented without impacting safe operations.

3.11.2 Documents comments and approval of proposed changes on Attachment 1, **AND** submits to CMC.

3.12 Facility Records Custodian

3.12.1 Receives, processes, and maintains the Equipment Change Authorization (ECA) data package.

4.0 PROCEDURE

NOTE

The CCP Manager will have final approval authority for the CCP Technical Baseline and Process Documents.

NOTE

CCP shall be provided with design drawings for systems/equipment, from the owner or supplier, under the responsibility of CCP. Changes to detail drawings are initiated by this procedure. Changes which affect design drawings are documented using Attachment 1. Vendor drawings are **NOT** revised; Attachment 1 is filed with the drawing to document the change.

4.1 Initiating a Change to CCP Characterization Equipment

NOTE

CCP's area of expertise is in the characterization and transportation activities related to the following documents:

- DOE/WIPP-02-3122, *Contact-Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*
- U. S. Department of Energy, *Contact-Handled Transuranic Waste Authorized Methods for Payload Control* (CH-TRAMPAC)
- NM4890139088-TSDF, *Waste Isolation Pilot Plant Hazardous Waste Facility Permit,* Attachments B-B6, *Waste Analysis Plan*
- DOE/WIPP 06-3345, *Waste Isolation Pilot Plant Flammable Gas Analysis*
- DOE/WIPP 01-3187, *Quality Assurance Program Plan for TRUPACT-II Gas Generation Test Program*
- DOE/WIPP 02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*

Any work outside of these areas, in particular regarding fabrication or refurbishment work, will require CCP to draw expertise from other organizations located at either the WIPP site or elsewhere. Areas that may require outside support include, but are not limited to, Engineering, Safety and Health, WTS QA, and operational activities.

NOTE
A description of the change or new equipment shall be submitted using Attachment 1. Sufficient detail shall be provided to describe the change or new equipment. Marked-up drawings shall be provided as necessary.

Initiator

4.1.1 Initiate Attachment 1 by obtaining an ECA number from the CMC, **AND** complete Blocks 1 through 6.

4.1.2 Forward Attachment 1 to the VPM.

VPM

NOTE
Input from the Host site STR will be needed to answer the screening questions.

4.1.3 Complete screening questions 1 and 2 in Section A1 of Attachment 1 in conjunction with the Host site.

4.1.4 Coordinate with the Host site STR to complete screening question 3 in Section A1 of Attachment 1.

[A] **IF NO** to all three screening questions, **THEN NO** further review is necessary.

[A.1] Obtain the STR's printed name, signature, and date; print name, sign, and date Section A1 of Attachment 1, **AND** submit to CCP Records.

[A.2] GO TO Section 4.6.

[B] **IF YES** to any of the screening questions, **THEN** continue to step 4.1.5.

4.1.5 Obtain the STR's printed name, signature, and date, **AND** print name, sign, and date Section A1 of Attachment 1.

4.1.6 Forward Attachment 1 to the CMC.

CMC

4.1.7 Review the requested change on Attachment 1 for completeness.

4.1.8 Consult with the CME, and determine the appropriate SPM to review Section A2 and the required reviewers in Section B1 of Attachment 1.

NOTE

The review completion date in Section B1 of Attachment 1 may be extended by the CME, if required, to complete analysis calculations and determine the impact of new calculations.

NOTE

All pages of Attachment 1 shall have the ECA number recorded on it.

4.1.9 With input from CME, determine and document the review completion date, **AND** print name of designated SPM/designated reviewer in Section A2/B1 of Attachment 1.

4.1.10 Distribute copies of Attachment 1, Section A and any attached documentation to the designated SPM.

NOTE

Work that requires equipment design, fabrication, refurbishment, or modification activity, the designated STR associated with the purchase order authorizing the work and CCP QA must give approval before the work begins to ensure all technical and QA requirements have been met. Work will be procured in accordance with CCP-QP-015, *CCP Procurement*.

4.1.11 Distribute copies of Attachment 1, Sections A and B, and any attached documentation to the designated reviewers, **AND** provide copies to those listed as notify only.

4.2 Reviewing a Change to CCP Characterization Equipment

SPM

4.2.1 Review the requested change and any accompanying documentation to determine if the change can be implemented without impacting safe operations, the certification status of the equipment, or causing a violation of CCP-PO-001, CCP-PO-002, or CCP-PO-003.

4.2.2 Document comments in Section A2 of Attachment 1, **AND/OR** attach comments to Attachment 1 labeling as required by CCP-QP-008, *CCP Records Management*.

4.2.3 Document approval of proposed change by signing, printing name, and dating Section A2 of Attachment 1.

4.2.4 Submit the completed Section A2 of Attachment 1 on or before the review completion date to the CMC.

Designated Reviewer

4.2.5 Review the requested change and any accompanying documentation to determine if the change will work as requested and can be implemented without impacting safe operations.

4.2.6 Document comments in Section B2 of Attachment 1, **AND/OR** attach comments to Attachment 1.

4.2.7 Document approval of proposed change by signing and dating Section B2 of Attachment 1.

4.2.8 Submit the completed Section B2 of Attachment 1 on or before the review completion date to the CMC.

4.3 Resolving Review Comments

CMC

4.3.1 Gather Reviewers comments.

NOTE

If comment resolution is received by email, a copy of the email shall be attached to Attachment 1.

4.3.2 Coordinate with the CME, SPM, and VPM to respond to the designated reviewer comments, as applicable.

4.3.3 Resolve each designated reviewer's comments.

4.3.4 **IF** comment resolution is received, document the resolution and approvals to comments in Section C of Attachment 1, **THEN** GO TO step 4.3.10.

4.3.5 **IF** designated reviewers' comments are conflicting and can **NOT** be resolved,

OR

IF a designated reviewer and the CME can **NOT** agree on the resolution to a comment,
THEN elevate the issue(s) to the CCP PM for resolution.

4.3.6 Forward comments from the Host site that can **NOT** be resolved at the Host site Operations level to the STR and the CCP Manager for resolution.

CCP PM/CME

4.3.7 Resolve comments.

4.3.8 Coordinate with designated reviewers who disapproved the change to obtain documented approval following comment resolution.

4.3.9 Coordinate with CMC to complete Section C of Attachment 1.

CMC

4.3.10 Upon comment resolution completion, print name, sign, and date Section C of Attachment 1.

4.3.11 **WHEN** Attachment 1 is approved with comments,
THEN provide comments to CCP PM or Designee for evaluation and implementation.

4.3.12 Obtain signature approval from the CCP PM or Designee in Section D of Attachment 1 to implement the change once all designated reviewer comments are resolved.

4.4 Disposition of Change

CCP PM/or Designee

4.4.1 Review the ECA package **AND** complete Section D by checking the appropriate box, provide comments if applicable, and print name, sign, and date.

4.4.2 Submit data package to CME/SPM.

4.5 Host Site USQ Review

NOTE

CCP may operate at facilities that are **NOT** controlled under a DOE approved Safety Basis. For these facilities, the portion of this procedure discussing the USQ process may be substituted with the applicable Host site's Safety Analysis process.

CME/SPM

4.5.1 Upon completion of Section D of Attachment 1, notify the Host site STR that CCP has approved the change and it is ready for the Host site's USQ review.

4.5.2 Work with Host site STR to complete the USQ process.

NOTE

The Host site USQ documentation shall be included with each ECA.

4.5.3 Upon receipt of USQ documentation, print name, sign, and date Section E of Attachment 1, **AND** submit to CMC.

4.5.4 **IF** USQ screen determines that proposed changes DO **NOT** involve a USQ,
THEN proceed with change.

4.5.5 If USQ screen determines that the proposed changes DO involve a USQ, work with the Host site STR to update Safety Basis documents and obtain approval by DOE prior to performing any physical work on the change.

CME

4.5.6 Provide the Host site with updated documentation.

4.6 Implementing the Approved Change(s) documented in Attachment 1.

CME

4.6.1 Coordinate with the VPM and the Host site to schedule and implement the change to the characterization equipment utilizing the Host site's Work Control Process.

4.6.2 Coordinate with the VPM, SPM, and CCP Training to determine the necessary training required to implement the change, as applicable.

4.6.3 Coordinate with CCP Document Services to implement changes to CCP documents in accordance with CCP-QP-010, *CCP Document Preparation, Approval and Control*, as applicable.

VPM

4.6.4 Coordinate the submittal of operating procedure(s) changes to CCP Document Services for review and approval in accordance with CCP-QP-010, as applicable.

4.6.5 Upon completion of work documentation submit a copy to the CMC.

4.7 Document Transmittal to File

CCP PM/VPM or Designee

4.7.1 Transmit approved ECA (Attachment 1) to the CMC along with all supporting documents (i.e., completed work packages, drawings) in accordance with CCP-QP-008.

CMC

4.7.2 Coordinate with CME to complete ECA data package.

4.7.3 Coordinate with CME to update the affected equipment description in accordance with CCP-QP-010.

4.7.4 Submit completed ECA data package to Facility Records Custodian.

Facility Records Custodian

4.7.5 Receive, process, and maintain the ECA data package.

5.0 RECORDS

5.1 Records generated during the performance of this procedure are maintained as QA records in accordance with CCP-QP-008. The records are the following:

5.1.1 QA/Nonpermanent

[A] Attachment 1, CCP Characterization Equipment Change Authorization, supporting documentation including comments and resolution.

[B] Purchase Order/property transfer/credit card purchases, if applicable

[C] AR/VRs, if applicable

[D] Operations and Maintenance (O&M) Manuals, if applicable

[E] Approved Testing and Calibration Documentation, if applicable

[F] Certificate of Compliance (C of C), if applicable

[G] Modification Documentation, if applicable

[H] Vendor Electrical and Mechanical Drawings, if applicable

[I] As-Built Drawings

[J] A manufacturer recommended Spare Parts List, if applicable

[K] An Equipment Design Description, if applicable

[L] Subcomponent Technical Document

[M] Document Containing Design Specifications

Attachment 1 – CCP Characterization Equipment Change Authorization

SECTION A - Change Description

1. ECA #:	
2. Initiator _____ Print Name	**3. Request Date** _____
4. Characterization Equipment Description and/or Equipment Number:	**5. Characterization Equipment Location:**
6. Proposed change/Impacted CCP documents/procedures/drawings (attach redline pages of each document/procedure/drawing if applicable):	

SECTION A1 – Screening

Screening Questions:

Is the change considered equivalent as defined in Section 1.1?

1. Does this request change the design requirements for the equipment?
   Yes_____ No_____

2. Does this request change any interface requirements? Yes____ No____

Question three (3) must be answered by the Host site STR. This may include performing a USQ determination.

3. Does this request impact the Host site DSA or Host site safety analysis?
   Yes____ No____

If **NO** to 1, 2, and 3, no further review is required. Obtain the VPM and Host site STR signatures below and submit to the CMC.

VPM:

_____	_____	_____
Printed Name	Signature	Date

STR:

_____	_____	_____
Printed Name	Signature	Date

Attachment 1 – CCP Characterization Equipment Change Authorization (Continued)

ECA #:

SECTION A2 – Impact

Review Completion Date: _____Designated SPM:_____
Printed name

Impact Questions:

1. Could the proposal affect the current certification of NDE, NDA, HSG or VE Systems? Yes_____ No_____

2. Is there a CCP Equipment Description (CCP-CM-0XX) for the equipment the change is proposed on? Yes _____ No_____

   If Yes, Document_____

3. Does the proposal result in a change to equipment or CCP Technical Baseline Documents? Yes ____ No_____

Review Comments

_____
_____
_____
_____
_____
_____
_____
_____

SPM:

_____	_____	_____
Printed Name	Signature	Date

Attachment 1 – CCP Characterization Equipment Change Authorization (Continued)

ECA #:

SECTION B – CCP Internal Review

Changes to equipment located at a host facility will require a screen to determine the impact on the Host site's documented safety analysis (DSA). This screen will be performed by the Host site through their established USQ process and procedures. The CCP internal review is intended to gain CCP approval for the change before it is screened by the Host site.

SECTION B1 – Designated Reviewers

If work requires equipment design, fabrication, refurbishment, or modification procurements, the STR designated in the associated Statement of Work for the Purchase Requisition and CCP QA must give approval before any modifications using this equipment can begin to ensure all procurement and quality requirements have been met.

YES	NO	Notify Only	
☐	☐	☐	Safety Analysis Group
☐	☐	☐	CCP QA
☐	☐	☐	STR (designated in SOW, if applicable)
☐	☐	☐	CCP Manager
☐	☐	☐	CME
☐	☐	☐	Initiator
☐	☐	☐	Other*
☐	☐	☐	Other*
☐	☐	☐	Other*

Review Completion Date: _____ Designated Reviewer: _____
Printed name

SECTION B2 - Review Comments

_____

_____

_____

_____

Designated Reviewer Signature: _____ Date: _____

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Attachment 1 – CCP Characterization Equipment Change Authorization (Continued)

ECA #:

SECTION C - Comment Resolution

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Comment resolution complete:

CMC:

Printed Name	Signature	Date

Attachment 1 – CCP Characterization Equipment Change Authorization (Continued)

ECA #:		Page ___ of ____

SECTION D – Disposition of Change

☐ Proceed with change, no certification impacts, Pending Host site USQ screen.

☐ DO **NOT** proceed with change, see comments below.

☐ Proceed with change, recertification activity required.

☐ Proceed with change, procedure change required.

☐ Proceed conditionally as described below:

_____

_____

_____

_____

CCP PM/or Designee:

_____	_____	_____
Printed Name	Signature	Date

SECTION E – Host Site Review

A USQ determination will be performed by the Host site through their established USQ process and procedures. The Host site's USQ documentation will be provided to CCP for inclusion in the involved ECA.

USQ documentation received and attached?

CME/SPM:

_____	_____	_____
Printed Name	Signature	Date

SECTION F – Work Complete

Work complete and all documentation received. Date: _____

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Appendix 1. Examples

A.1 Examples of activities to consider for screening (this is NOT an exhaustive list)

a. Activities affecting confinement of radioactive material. Examples: Changes to gloveboxes and glovebox ventilation systems. Changes in secondary confinement around a glovebox system.

b. A change to the output of gamma generators, change the activity of a check source, affect shielding, or other changes that could raise the dose to the operator or the co-located worker. Examples: Changing the x-ray generator on an RTR, changing the check source on an NDA instrument, changes in shielding around NDE/NDA.

c. Activities that affect assay chamber geometry or change the orientation or location of NDE/NDA detectors.

d. Activities that raise the background radiation levels around the NDA instrument. Examples: New drum storage area close to NDA. Removing or relocating poly shielding around the HENC chamber.

e. Changing the method or equipment used for sampling drum headspace.

f. Changing the method or equipment used for analysis for drum headspace.

g. Activities which change combustible loading, or modify fire protection system.

h. Removal of stairs, ladders or platforms described in the Authorization Basis Support Document (ABSD).

i. Changes in electrical components described in the ABSD.

j. Changes to HVAC that impact instrument operating temperatures or the ABSD description.