

# CCP-QP-005

Revision 19

## CCP TRU Nonconforming Item Reporting and Control

EFFECTIVE DATE: 10/14/2010

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PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
5	03/11/2002	Modified document to include e-QA® information. Added Figure 3 - Electronic e-QA® Nonconformance Report Form.
6	05/14/2002	Clarified sections 2.1.0 and 4.2 to state that items with Hold tags may be moved and processing in order to implement the NCR disposition. Revised section 4.0 to correct a previous error in the steps for entering NCR information in e-QA. Rewrote the responsibilities of the SPQAO and FQAO to state that only the SPQAO is allowed to sign for final closure of an NCR in Block 22.2. Made other editorial corrections.
7	10/24/2002	Revised 4.34 based on SRS Recertification Audit.
8	05/08/2003	Revised to address issues identified in CAR-CCP-0512-02, Revision 0, First Quarter 2002, Trend Report (ref; Inter-Office Correspondence TP:02:04131), and WTS Audit I 02-07. Made changes from Adela Cantu: changed Use-As-Is, and made changes to Figure 1.
9	09/17/2003	<p><u>General Changes</u></p> <ol style="list-style-type: none"> <li>1. Revised document to comply with format requirements as defined in Section 2.3 of CCP-QP-010.</li> <li>2. Incorporated electronically fillable forms and updated references in procedure.</li> <li>3. Incorporated QAPD Rev 5 requirements.</li> <li>4. Revised Section 4.0 to reflect process flow from initiation thru closure and added validation/verification criteria.</li> <li>5. Added <ul style="list-style-type: none"> <li>• NCR Continuation Sheet as new Record</li> <li>• Added CBFO Notifications as new Record</li> <li>• Deleted e-QA NCR as CCP-QP-005 Record (Part of e-QA Software)</li> <li>• Added Appendix A Trend Codes</li> </ul> </li> </ol>
10	08/23/2005	Revised to delete e-QA® processing. Revised to incorporate corrective actions for CAR-SRS-0002-04 and CAR-NTS-0007-04 and SRS Audit Report 2004-AR-26-0006. Also added additional validation criteria for verification/validation of container and Batch Data Report (BDR) identifications.

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
11	06/22/2006	Revised to incorporate corrective actions resulting from the Los Alamos National Laboratory (LANL) Recertification Audit A 06-11, Corrective Action Reports (CAR 06-24 and 06-25, and CAR CCP-0003-06.
12	09/19/2006	Revised in response to CAR 06-037.
13	11/16/2006	Revised to implement changes to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit requirements resulting from the Section 311/RH PMR.
14	04/16/2007	Changes included a reference to container management procedures for control of containers with restrictions other than nonconformances, a clarification of responsibilities for NCR validation and approval of interim and final dispositions, and addition of Section 4.13 addressing work suspension/stop work.
15	07/12/2007	Revised in response to Corrective Action Report CBFO-07-015 to provide clarification of the requirements for reporting/notifications of Nonconformance Reports. Also revised Section 4.9 to clarify the process for voiding Nonconformance Reports.
16	05/07/2008	Revised in response to Corrective Action Report (CAR) CAR-SRS-0001-08. Revised to address paragraph 1.3.2.4 D of DOE/CBFO-94-1012, <i>Quality Assurance Program Document (QAPD)</i> , Revision 9, regarding not solely relying on a single administrative control to differentiate waste containers that are acceptable for shipment to the Waste Isolation Pilot Plant (WIPP) from those containers that do not meet the WIPP waste acceptance criteria.

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
17	08/27/2008	Revised to include language describing the process the Central Characterization Project (CCP) personnel use when performing open Nonconformance Report (NCR) checks and whether the NCR is "resolved" for a particular container in conjunction with software changes to the Progress Tracking System (PT-S) (NCR status) portion of the CCP Datacenter. Also included additional language with respect to reconciliation of HOLD Tags once the NCR's are cleared for containers and incorporated the directive in Standing Order CCP-SO-30, Clarification of Rework and Reject. This is in response to U.S. Department of Energy-Carlsbad Field Office (DOE/CBFO) Corrective Action Report (CAR) CAR-08-025.
18	08/13/2009	Revised to incorporate freeze file editorial changes, clarify the ability to delete/remove containers from the Batch Data Report (BDR)/Container ID list when revising a nonconformance report (NCR) per CAR-LANL-0001-09, and incorporate Central Rev. Characterization Project (CCP) Standing Order (SO) CCP-SO-024, 1.
19	10/14/2010	Revised to: clarify hold tag application; Carlsbad Field Office (CBFO) notification requirements including responsibility, incorporate CCP-SO-054, 1 and CCP-SO-065, 0; revisions to Attachment 1, CCP Nonconformance Report (NCR); and other minor editorial changes.

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## 1.0 PURPOSE

This procedure, used in conjunction with CCP-QP-004, *CCP Corrective Action Management*, identifies the process for documenting and controlling deficient items using a nonconformance report (NCR) process.

### 1.1 Scope

This procedure applies to activities affecting the quality of Central Characterization Project (CCP) waste characterization, certification, packaging, and transportation. It establishes the process for identifying, documenting, controlling, evaluating, dispositioning, and verifying completion of corrective actions for nonconforming conditions associated with items, systems, equipment, and Batch Data Reports (BDRs). It also establishes the controls for processing NCRs.

The process for initiating Corrective Action Reports (CARs) for conditions adverse to quality related to programmatic or process failures, malfunctions, and deficiencies is addressed in CCP-QP-006, *CCP Corrective Action Reporting and Control*.

Evaluation of NCRs for significant and or recurring conditions adverse to quality is addressed in CCP-QP-004.

Evaluation of NCRs for Price-Anderson Amendment Act (PAAA) issues and activities is covered in CCP-PO-008, *CCP Quality Assurance Interface with the WTS Quality Assurance Program*.

Trend Codes for NCR conditions are contained in CCP-QP-014, *CCP Quality Assurance Trend Analysis and Reporting*.

## 2.0 REQUIREMENTS

### 2.1 References

#### Baseline Documents

- DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*
- DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*

#### Referenced Documents

- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan (QAPjP)*
- CCP-PO-008, *CCP Quality Assurance Interface with the WTS Quality Assurance Program*
- CCP-QP-004, *CCP Corrective Action Management*
- CCP-QP-006, *CCP Corrective Action Reporting and Control*
- CCP-QP-008, *CCP Records Management*
- CCP-QP-010, *CCP Document Preparation, Approval and Control*
- CCP-QP-014, *CCP Quality Assurance Trend Analysis and Reporting*
- CCP-TP-001, *CCP Project Level Data Validation and Verification*
- 10 Code of Federal Regulations (CFR) Part 71, *Packaging and Transportation of Radioactive Materials*

2.2 Conditions Adverse to Quality

- 2.2.1 CCP personnel who discover nonconforming items, activities, and processes have the responsibility to originate NCRs for nonconforming items, systems, or equipment or to notify their managers for assistance in ensuring that an NCR is written. Personnel are encouraged to suggest improvements. Nonconformances will be documented, evaluated, and dispositioned with a no-fault attitude fostered by management at all levels.
- 2.2.2 Personnel evaluating and determining the disposition of nonconforming items will have demonstrated competence in the specific area they are evaluating, adequate understanding of the requirements, and access to pertinent background information.
- 2.2.3 NCRs are not to be used as administrative holds (e.g., to stop a shipment where there is **NO** nonconformance). Reference the container management procedures for specific sites for more details on the proper use of administrative holds.

## 2.3 Reporting and Control

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### NOTE

The precautions selected SHALL **NOT** be solely reliant on a single administrative control to differentiate waste containers that are acceptable for shipment to the Waste Isolation Pilot Plant (WIPP) from those containers that **DO NOT** meet the WIPP acceptable criteria.

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### NOTE

When it is determined that CCP HOLD TAGS will be applied, the CCP HOLD TAGS SHALL remain on the containers until the nonconforming condition has been resolved and the technical disposition has been implemented and verified under the CCP Program.

Resolution of nonconforming containers is not predicated on the closure of the NCR but rather by verifying the acceptable completion of the disposition for individual containers and releasing them for shipment to WIPP. For all containers resolution confirmation is performed by Quality Assurance (QA) using the "Resolve" or "Return" feature in the Nonconformance Report Module (NCRM).

Other methods used to control the affected items may include segregation and/or the use of dual independent check systems (for non-compliant remote-handled [RH] waste packages based on the As Low As Reasonably Achievable [ALARA] principle) which utilize two separate and distinct processes and data sets for verifying waste packages are acceptable for shipment.

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- 2.3.1 The Site Project Manager (SPM) is responsible for overseeing the NCR process, developing a plan to identify and track all nonconformances, and reporting this information. The requirement for the SPM to develop a plan is satisfied by approval of this procedure. Nonconforming items will be identified by marking or tagging, and/or segregating. The identification will provide traceability to the NCR number, will be legible and easily recognizable, and will remain attached to the nonconforming item(s) until all actions required by the disposition have been completed and accepted. It is required that all containers that are identified with an NCR be physically tagged with a CCP HOLD TAG until resolution of the nonconformance, except as identified in step 4.1.2[A].

2.3.2 Most CCP NCRs are written to document conditions that DO **NOT** reflect on the adequacy of the CCP QA program (e.g., NCRs for containers that have a prohibited item). NOTE on page 26 after Section 4.2.7 of this procedure lists the types of NCR conditions that fall into this category. These are designated with Trend Code K in accordance with CCP-QP-014.

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**NOTE**

CCP Training will maintain a list of personnel designated to perform NCR validation and approve interim and final dispositions for Trend Code K NCRs.

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[A] NCR validation and approval of interim and final dispositions for these NCRs may be performed by designated CCP personnel. Those steps in Section 4.0 of this procedure which contain steps that may be performed by designated CCP personnel, as described above, will be identified by “or Designee.”

[B] In all cases, the final verification and closure of Trend Code K NCRs will be performed by CCP QA.

[C] NCRs which are not designated with Trend Code K must be validated and approved throughout by CCP QA.

2.3.3 **IF** marking or tagging of a nonconforming item is not practical, **OR** segregation is impractical or impossible due to physical conditions, **THEN** other precautions will be employed to preclude inadvertent use and/or shipment.

2.3.4 Nonconforming items will be documented on an NCR, including those found by CCP personnel at a supplier's facility or during a receipt inspection.

2.3.5 NCRs will be clearly identified and will describe the characteristics that do not conform to specified requirements.

2.3.6 NCRs will have a unique numbering and logging system and will account for all NCRs issued, including voided NCRs. An NCR log will be maintained (generated either manually or electronically by the generator site and the CCP Project Office) and will identify the following, as a minimum:

[A] NCR number

[B] Initiation date

[C] NCR Originator

This log is used to account for all NCRs issued during a calendar year at a generator site and the CCP Project Office.

The NCR numbering system will provide the capability to determine the following:

- Document is an NCR
- Site Designator
- Sequential number issued for the organization or site in that calendar year
- Calendar year issued
- Revision number

Example NCR Numbers

- NCR-INL-0001-06, Rev. 0
- NCR-SRS-0001-06, Rev. 1
- NCR-LANL-0001-06, Rev. 2

2.3.7 Nonconforming items will be controlled to prevent any adverse impact on test, installation, use, waste certification, or waste shipment. Organizations affected by the nonconformance will be notified.

## 2.4 CBFO Notification

2.4.1 The CCP SPM will notify the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) of identification of any non-administrative nonconformances which are first identified at or after the SPM's signature release level (i.e., a failure to meet a data quality objective [DQO]) as follows:

- **IF** related to applicable requirements specified in CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan (QAPjP)*, **THEN** the notification will be within seven (7) calendar days
- **IF** related to applicable requirements specified in DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*, **THEN** notification will be made within five (5) Calendar days.

- **IF** the results of the sampling and analysis are inconsistent with Acceptable Knowledge (AK) documentation **AND** are first identified at or after the SPM's signature release level within seven (7) days, for all types of notification, **THEN** the NCR will be submitted to DOE CBFO within thirty (30) calendar days of identification of the deficiency.

## 2.5 Evaluation and Disposition

- 2.5.1 NCRs are validated before beginning the evaluation and disposition process.
- 2.5.2 Once an NCR is validated, the NCR will be evaluated for significance and recurrence in accordance with CCP-QP-004.
- 2.5.3 NCRs will be reviewed and recommended dispositions of nonconforming items will be proposed.
- 2.5.4 The disposition for nonconforming items will be identified and documented.
- [A] The standard schedule for completing the NCR disposition is ninety (90) calendar days from the date of the final NCR disposition.
- [B] **IF** completion of the NCR is anticipated to take more than ninety (90) calendar days from the date of the final NCR disposition, **THEN** the final disposition must identify the expected completion date.
- [C] NCRs with a final disposition that is outside the control of CCP are exempted from the requirement to identify an expected completion date. These are typically NCRs where the disposition is to return the container to the host location for correction of the nonconforming condition.
- 2.5.5 Interim dispositions will only be used when necessary to achieve a final disposition.
- 2.5.6 Items that do not meet original design requirements that are dispositioned Use-As-Is or Repair will be subject to design control measures commensurate with those applied to the original design. If changes to the specifying document are required to reflect the as-built condition, then the disposition shall require action to change the specifying document to reflect the accepted nonconformance. Any document or QA record change required by

the disposition of the nonconformance shall be identified in the nonconformance documentation, and when a document or record is changed, the justification for the change shall reference the nonconformance documentation.

- 2.5.7 The disposition of an item to be reworked or repaired will contain requirements to re-examine, inspect, test, or conduct nondestructive examination (NDE) to verify acceptability. Repaired or reworked items will be re-examined using the original process and acceptance criteria, unless alternative acceptance criteria or methods have been established and approved as part of the nonconforming item disposition.
- 2.5.8 Reject dispositions will be accompanied by instructions for the disposal of the item(s), such as Scrap or Return-to-Vendor, in accordance with applicable procedures.
- 2.5.9 Final dispositions will address all items described by the NCR and are limited to Use-As-Is, Reject, Repair, Rework, and Scrap. Validated NCRs cannot be closed until completion and verification of the final disposition.
- 2.5.10 NCRs are limited to only one Interim or Final Disposition type per NCR.
- 2.5.11 Recommended dispositions will be evaluated and approved.
- 2.5.12 Further processing, delivery, installation, or use of a nonconforming item will be controlled, pending the evaluation and approval of the disposition.
- 2.6 Nonconformance Reporting Module (NCRM)
  - 2.6.1 The NCRM will provide the capability for an accurate and timely assessment of the status of all NCRs.
  - 2.6.2 The NCRM will provide the capability to trend NCRs for conditions adverse to quality.
  - 2.6.3 The NCRM will provide, as a minimum, the following:
    - [A] NCR Number and Revision
    - [B] Initiation Date
    - [C] NCR Originator

- [D] Responsible Manager
- [E] BDR/Container (as applicable)
- [F] Actual Condition
- [G] Final Disposition
- [H] Trend Code
- [I] Closure Date

2.6.4 The NCRM is maintained in the CCP Project Office. The NCRM may also be updated by specified Host facilities.

### 3.0 RESPONSIBILITIES

#### 3.1 NCR Originator

- 3.1.1 CCP personnel who discover conditions adverse to quality are responsible for originating an NCR or ensuring an NCR is written.
- 3.1.2 Applies or ensures application of a CCP HOLD TAG or provides other segregation/control methods.

#### 3.2 CCP QA

- 3.2.1 Validates the NCR.
- 3.2.2 Performs NCR evaluations in accordance with this procedure and CCP-QP-004.
- 3.2.3 Approves interim and final dispositions.
- 3.2.4 Ensures that NCRs are entered into the NCRM.
- 3.2.5 Verifies interim and final disposition completion and closes NCRs.
- 3.2.6 Applies, removes, and/or ensures application/removal of CCP HOLD TAGS (if applicable) and will reconcile the removed HOLD TAGS prior to releasing a container or closing an NCR.
- 3.2.7 Immediately notifies the SPM/Vendor Project Manager (VPM) when HOLD TAGS DO **NOT** reconcile or when orphan HOLD TAGS are found in process areas.
- 3.2.8 Provides CCP Training with a notification of individuals who are designated to validate and approve dispositions for NCRs that are Trend Code K. These individuals will have been briefed and designated for this function by CCP QA.

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#### **NOTE**

Designees are only allowed to review and sign NCRs that are assigned Trend Code K. All other NCRs must be reviewed and signed by CCP QA.

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#### 3.3 CCP QA Designee

- 3.3.1 Validates Trend Code K NCRs.
- 3.3.2 Approves interim and final dispositions for Trend Code K NCRs.
- 3.3.3 Ensures that NCRs are forwarded to the Host site CCP QA NCR Coordinator or the CCP Project Office NCR Coordinator for entry into the NCRM.

- 3.3.4 Applies, removes, and/or ensures application/removal of CCP HOLD TAGS (if applicable) for Trend Code K NCRs and will deliver removed HOLD TAGS to CCP QA for validation of removal and reconciliation.
- 3.4 Responsible Manager
  - 3.4.1 Provides interim and/or final dispositions to correct identified deficiencies.
  - 3.4.2 Identifies corrective action(s) to resolve deficiencies and (when applicable) identifies actions to preclude recurrence.
  - 3.4.3 Monitors progress of nonconformance resolution, including completion of dispositions in a timely manner.
  - 3.4.4 Provides for the control of further processing, delivery, installation, or operation of nonconforming items, systems, or equipment.
- 3.5 CCP Site Project Manager (SPM)
  - 3.5.1 Ensures NCR process is followed in accordance with this procedure and is accountable for the implementation of the nonconformance program.
  - 3.5.2 Coordinates the CBFO notification process between the Certification Manager and the NCR Coordinator.
  - 3.5.3 Prepares interim and final dispositions.
  - 3.5.4 Verifies interim and final disposition completion.
  - 3.5.5 Ensures submittal of validated and in-process NCRs to the CCP Project Office for NCRM updates, as necessary.
  - 3.5.6 Ensures distribution of completed NCRs as required by applicable interface documents.
  - 3.5.7 Notifies CBFO of nonconformances as required by this procedure.
  - 3.5.8 Monitors to ensure timely completion of NCRs in their area of responsibility.
  - 3.5.9 Performs responsibilities of the Responsible Manager, when so assigned on an NCR.

- 3.6 Vendor Project Manager (VPM)
  - 3.6.1 Ensures site personnel performing NCR evaluations and dispositions have demonstrated competence in the specific area they are evaluating, have an adequate understanding of the requirements, and have access to pertinent background information.
  - 3.6.2 Monitors to ensure timely completion of NCRs in their area of responsibility.
  - 3.6.3 Performs responsibilities of the Responsible Manager, when so assigned on an NCR.
  - 3.6.4 Concurs with interim and final dispositions (as requested).
  - 3.6.5 Ensures the application of CCP HOLD TAGS and, in coordination with CCP QA, ensures their removal upon container resolution and/or NCR closure, as required, and will assure removed CCP HOLD TAGS are delivered to CCP QA for validation of removal and reconciliation.
  - 3.6.6 Notifies the host facility of drums that are inaccessible with a request to make them available as soon as possible in order for the drums to be monitored and tagged as soon as they are available.
- 3.7 NCR Coordinator (Site CCP QA serves as the QA Coordinator for the assigned site)
  - 3.7.1 Maintains the NCR Log.
  - 3.7.2 Distributes NCRs in accordance with this procedure.
  - 3.7.3 Provides closed NCRs to CCP Records.
  - 3.7.4 Updates the NCRM.
- 3.8 CCP Training
  - 3.8.1 Annotates each site-specific List of Qualified Individuals (LOQI) with a qualified statement for individuals that have been designated by CCP QA.
  - 3.8.2 Maintains designation notifications in each individual's training file.

3.9 Certification Manager

- 3.9.1 Ensures a consistent review for all NCRs that have the potential to require CBFO notification according to the 5/7-day notification requirement.

4.0 PROCEDURE

4.1 NCR Initiation

**NCR Originator**

4.1.1 Upon identification of a nonconforming item, perform the following:

- [A] Obtain the latest issued revision of Attachment 1, CCP Nonconformance Report (NCR).

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**NOTE**

The NCR Coordinator in the CCP Project Office and the CCP QA representatives located at the host site maintain the NCR Logs. The CCP QA representatives located at the host site maintain NCR Logs and issue numbers when requested. The NCR Coordinator in the CCP Project Office issues NCR numbers for those locations without CCP QA at the host site (e.g., ECL, ALD, etc.). Any NCR generated after the DGL validation and verification of a BDR will be designated as a project-level NCR and will be processed through the Carlsbad Project Office.

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**NOTE**

Expert analyst review of Nondestructive Assay (NDA) results can result in NCR tags being prepared and hung after the NCRs are written.

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- [B] Obtain an NCR number from the NCR Coordinator, **OR** obtain the next sequential NCR Number from the block of numbers assigned to Host sites, **AND** enter the number and revision on all pages of Attachment 1.

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**NOTE**

Block 1 is to list applicable lot numbers when a procurement/supplier issue is identified. This block is not used to refer to certification lot numbers. Block 6 is to list applicable suppliers. A site is not a supplier.

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- [C] Complete Blocks 1 through 7, as applicable, of the NCR form.
- [C.1] Enter N/A (Not Applicable) for those blocks **NOT** applicable to the NCR. (Use Attachment 2, CCP Nonconformance Report (NCR) Continuation Sheet, if necessary.)

**NOTE**

An NCR shall be prepared for each nonconformance identified. Multiple containers and/or other items may be identified on one NCR provided the nonconformances are the same. Each NCR shall be initiated by the individual(s) identifying the nonconformance. For global NCRs where containers may be added without revising the NCR, the individual that identifies the nonconformance assures the container is added to the appropriate NCR. For NCRs that are written for multiple BDRs and containers (Block 3), the relationship between containers and their applicable BDRs **MUST** be maintained. Use Attachment 2 or attachments, as necessary. All NCRs shall be processed by knowledgeable and appropriate personnel.

An NCR may be prepared on a calendar year basis to allow drums to be added without revision to the NCR, if there are a number of occurrences, or an extended time period anticipated. For global NCRs where containers may be added without revising the NCR, the individual that identifies the nonconformance assures the container is added to the appropriate NCR. In this case, the fact **MUST** be clearly stated on the NCR to add drums. Drums may **NOT** be added to global NCRs from a previous year. The existing drum list will not be carried forward to the new NCR number.

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- [D] **IF** the NCR is written against a container and a BDR, **THEN** ensure that Block 3 correctly identifies the container number and BDR number, **AND** that it matches exactly the container ID and BDR ID as identified in the BDR.

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**NOTE**

NCRs generated during Project Level reviews in accordance with CCP-TP-001, *CCP Project Level Data Validation and Verification*, which are written against BDR(s) and associated container(s) shall be managed through the Carlsbad Project Office and the NCR shall indicate a project level issue. The associated containers may require application of CCP HOLD TAGS and shall be controlled at the applicable Host site. The Responsible Manager shall ensure control of these containers and completion of Section 4.1.2[A].

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**NOTE**

For those NCRs identified as Transportation, a copy of the NCR shall be provided to the Manager of Packaging for consideration of 10 CFR 71, *Packaging and Transportation of Radioactive Materials*, applicability.

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**WCO/WCA/CCP QA**

[E] The NCR Originator with assistance from the WCO, WCA and CCP QA will determine the status of all affected container(s) associated with NCRs written at the Project level as follows:

[E.1] **IF** the container(s) is/are not in a shipping lot,  
**THEN** go to step 4.1.3[C]

[E.2] **IF** the container(s) is/are in a shipping lot,  
**THEN** it must be determined if the container is in Waste Data System (WDS).

(a) **IF** the container(s) is/are in WDS **AND** the NCR is not data affecting,  
**THEN** go to step 4.1.3[C]

(b) **IF** the container(s) is/are in WDS **AND** the NCR is data affecting,  
**THEN** the container(s) must be moved into Pre-sub certification **OR** removed from WDS before the NCR can be validated by QA

**NOTE**

When it is determined that CCP HOLD TAGS will be applied, the CCP HOLD TAGS SHALL remain on the containers until the nonconforming condition has been resolved and the technical disposition has been implemented and verified under the CCP Program.

Other methods used to control the affected items may include segregation and/or the use of dual independent check systems (for non-compliant RH waste packages based on the ALARA principle) which utilize two separate and distinct processes and data sets for verifying waste packages are acceptable for shipment.

4.1.2 NCR Originator/Designee

[A] Determine whether CCP HOLD TAGS will be applied **OR** whether other methods will be used to control the affected items, **AND** document in Block 9(b) of the NCR form.

[A.1] Apply CCP HOLD TAGS UNLESS the following conditions exists:

- **IF** containers are physically inaccessible, **THEN** (inform the VPM to notify the host facility of drums that are inaccessible with a request to make them available as soon as possible in order for the drums to be monitored and tagged as soon as they are available
- Container is an RH container
- Other physical identification methods (i.e., Permanent Reject Labels Not Certifiable to WIPP)

[B] The minimum information required on the CCP HOLD TAG is as follows:

- NCR number
- Container/Item number
- BDR number (if applicable)
- Brief description of nonconforming condition
- Name/Date/Signature of individual applying the CCP HOLD TAG

- Limitations on further processing, if any
- [C] Complete Blocks 7(a), 7(b), and 7(c) of the NCR form (use Attachment 2, if necessary).
  - [C.1] Ensure that the Required Condition (7b) correctly identifies the procedure, revision, and section and that the Actual Condition (7c) is correct.
- [D] Print name, sign, and date Block 8.

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**NOTE**

The CBFO shall be notified of identification of any non-administrative nonconformances related to applicable requirements specified in CCP-PO-001 and/or DOE/WIPP-02-3214 or when the sampling and analysis are inconsistent with AK documentation which are first identified at or after the SPM level (e.g., CCP-TP-001).

---

**SPM**

- 4.1.3 **IF** the NCR is initiated during or subsequent to SPM review, in accordance with CCP-TP-001, contact the Certification Manager via e-mail for determination if notification to CBFO is required, **THEN** prepare a notification to the CBFO, as required by CCP-QP-004, Attachment 6, CBFO Notification Process Requirements. Ensure the NCR Coordinator receives the determination emails for further processing of the NCR.
- [A] Transmit notification to CBFO within seven (7) calendar days (CH & sampling/analysis) or five (5) calendar days (RH) (Refer to Section 2.4.1 for detail).
  - [B] Any NCR designated as a project-level NCR will receive an e-mail confirmation from the certification manager whether or not the NCR is reportable. Forward a copy of the e-mail and CBFO Notification to the NCR Coordinator within the allotted 5/7 days for inclusion in the NCR file and updating the NCRM.
  - [C] Transmit the current revision of the NCR requiring notification to CBFO within thirty (30) calendar days of identification.

---

**NCR Originator**

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**NOTE**

Designees are allowed to review and sign only NCRs that are assigned Trend Code K. All other NCRs must be reviewed and signed by CCP QA.

---

4.1.4 Forward the NCR to the CCP QA Engineer or Designee for review.

4.1.5 **IF** the NCR is initiated at the Host site, **AND** there is **NOT** an SPM/CCP QA Engineer or Designee available, **THEN** perform the following:

[A] Make a copy of the NCR and forward the copy to the responsible individual at the Host site for NCR Log update.

[B] Forward the NCR to the NCR Coordinator in the CCP Project Office. The NCR Coordinator will initiate a review by a CCP QA Engineer in the CCP Project Office.

4.2 Review and Validation

**CCP QA Engineer or Designee**

4.2.1 Review **AND** validate the NCR by performing the following, at a minimum:

[A] Verify that the identified condition and requirement meet the criteria for an NCR (i.e., hardware items and/or BDRs) and **NOT** programmatic or process failures, malfunctions, and deficiencies as addressed in CCP-QP-006.

---

**NOTE**

There may be instances where both an NCR and a CAR are appropriate. The NCR may be needed to provide control of nonconforming items, and the CAR may be needed to address programmatic issues relating to the nonconformance. In these instances, both shall be processed as required by each implementing procedure.

---

[B] **IF** the nonconformance is determined to meet the criteria for a CAR, **THEN** void the NCR in accordance with Section 4.9, **AND** instruct the NCR Originator to initiate a CAR in accordance with CCP-QP-006.

- [C] **IF** the NCR is written against a container and a BDR, **THEN** verify that Block 3 correctly identifies the Container number and BDR number, **AND** that it matches exactly the Container ID and BDR ID as identified in the BDR.
- [D] Verify that the latest issued revision of the NCR form is used, the NCR number and revision are on all pages of the NCR, **AND** the form is filled out correctly.
- [E] Verify that the actual condition requiring corrective action adequately addresses the identified requirement (procedure, revision, section, and text).

4.2.2 **IF** any inconsistencies, clarifications, or other concerns are identified, **THEN** resolve with the NCR Originator, **AND** reprocess per step 4.1.1.

4.2.3 **IF** the NCR is determined to be valid, **THEN** validate the NCR by concurring in Block 9.

4.2.4 **IF** the NCR is determined to be invalid, **THEN** void the NCR in accordance with Section 4.9.

---

**NOTE**

Steps 4.2.5 and 4.2.6 may be completed in any order.

---

4.2.5 Determine if the identified condition has the potential to impact AK, complete Block 9a, **AND GO TO** step 4.2.7 (i.e., related to waste stream variance, waste matrix code, etc). Refer to NOTE on page 26.

---

**NOTE**

Verification of CCP HOLD TAGS can be performed by physically placing or confirming tag placement on the container, or by receiving in writing from the VPM/Designee.

---

4.2.6 Verify that the hold tags have been applied as needed, **AND** complete block 9b.

4.2.7 Determine if the identified condition is significant and/or a recurring condition adverse to quality by evaluating in accordance with CCP-QP-004.

4.2.8 Enter results of review in Block 10 and 11 of the NCR, **AND** initiate a CAR in accordance with CCP-QP-006 (if applicable).

[A] Enter the assigned CAR number in Block 10 or 11 (if applicable).

4.2.9 Identify the Trend Code utilizing NCR Trend Codes found in CCP-QP-014, Attachment 2, Trend/Cause Codes, **AND** enter the Trend Code in Block 12, if not previously identified in step 4.2.5.

4.2.10 NCRs that identify possible changes to the AK of a waste stream (Trend Code L) will be forwarded to the SPM as the Responsible Manager.

[A] **IF** re-evaluation is warranted as a result of:

- Inconsistencies noted during the process of comparing AK information to characterization results, **OR**
- The initiation of an NCR(s) identifies potential changes to the AK of a waste stream,

**THEN** the SPM notifies the AK Expert.

---

**NOTE**

Suggested examples of possible changes to the AK of a waste stream are:

- Incorrect assignment of a waste container to a waste stream (e.g., sludge matrix in a debris container).

Identification of unanticipated waste material parameters (WMPs) in a container (e.g., metal in a combustibles-only debris container).

---

**NOTE**

The Responsible Manager determination is based on negotiations and agreements between the SPM and/or CCP QA Engineer and applicable Responsible Managers.

---

4.2.11 Determine the manager responsible for resolution.

4.2.12 Enter the Responsible Manager's name in Block 13.

4.2.13 Forward the NCR to the NCR Coordinator at the Host site (if applicable) or the NCR Coordinator in the CCP Project Office for processing.

---

**NOTE**

The SPM and/or CCP QA Engineer may, if deemed expedient, submit directly to the Responsible Manager NCRs that can be readily dispositioned, and then submit to the NCR Coordinator for processing.

---

4.3 NCR Processing

**NCR Coordinator**

4.3.1 Upon receipt of the NCR, perform the following:

[A] Verify the NCR information matches information in the NCR Log.

[B] Update NCRM in accordance with NCRM Data Input Instructions.

[B.1] **IF** the NCR Description in Block 7(a) is Transportation,  
**THEN** a copy of the NCR must be submitted to the Transportation manager for review requesting the results of the review.

[B.2] **IF** the NCR is determined to be reportable,  
**THEN** place a copy of the email from the Transportation manager in the file with the NCR.

[B.3] **IF** the NCR was generated at or after the SPM signature level,  
**THEN** a copy of the NCR must be submitted to the Certification Manager for review to determine CBFO notification in accordance with Section 2.4.1 and 4.1.4 of this procedure.

[B.4] **IF** the NCR is determined to be or not to be reportable, ensure the notifications and related e-mails are received in the 5/7 days allotted time,  
**THEN** update the NCRM, **AND** place a copy of the WIPP notification and related e-mails in the file with the NCR.

[C] Forward the NCR to the Responsible Manager.

4.4 Disposition Determination

**Responsible Manager**

---

**NOTE**

The Responsible Manager may assign responsibility for interim and final dispositions to responsible individuals (Block[s] 15 and/or 20 of the NCR form), but maintains overall responsibility for NCR completion.

---

- 4.4.1 Determine the need for interim disposition, **AND**, if applicable, identify any additional approval requirements.
  - 4.4.2 Complete Block 14 of the NCR (Use Attachment 2, if necessary), **AND** print, sign, and date in Block 15.
  - 4.4.3 **IF** interim disposition is **NOT** required, **THEN** check N/A in Block 14.
- 

**NOTE**

Nonconforming items with their CCP HOLD TAGS may be further processed unless otherwise directed by the NCR. Specific limitations or actions identified in the approved NCR disposition must be written on the CCP HOLD TAG. However, no processing steps may be taken that would interfere with the ability to complete and accept the disposition stated in the NCR.

---

- 4.4.4 Evaluate nonconforming condition, **AND** provide a final disposition to correct the identified deficiency.
  - [A] **IF** the final disposition is expected to take more than ninety (90) days to implement, **AND** the disposition can be implemented by CCP, **THEN** include the anticipated completion date in the final disposition (see step 2.5.4 for additional detail).

4.4.5 Check the appropriate box in Block 19.

---

**NOTE**

Final dispositions may be deferred until after completion of interim dispositions, if applicable and if deemed necessary.

---

**NOTE**

Use-As-Is dispositions **MUST NOT** contain any actions. The nonconforming condition remains as identified in Section 7(b) and the technical justification provides for acceptance.

---

4.4.6 **IF** the disposition is Use-As-Is,  
**THEN** provide Technical Justification in Block 19(a) (use Attachment 2, if necessary).

4.4.7 **IF** the disposition is Repair,  
**THEN** provide Technical Justification in Block 19(a) and instructions for completion of Repair Disposition in Block 19(c) (use Attachment 2, if necessary).

---

**NOTE**

NCRs written on containers that have been characterized and the nonconformance identifies that the condition is such that the container is to be returned to the Host site for correction of the nonconforming item shall have a Final Disposition of Reject, with instructions similar to "Return to Host site". For these containers, the NCR is **NOT** closed, and the container returned to the Host site with the CCP HOLD TAG attached to the container (e.g., a container has a prohibited item and requires remediation to bring the container into compliance with CCP-PO-001 acceptance criteria). For such containers, CCP HOLD TAGS **SHALL NOT** be removed until nonconforming conditions have been corrected **AND** verified by CCP under the CCP Program. Any orphan tags found **SHALL** be presented to CCP QA for action to be taken in accordance with step 4.7.4[A].

---

4.4.8 **IF** the disposition is Reject or Scrap,  
**THEN** provide disposition instructions in Block 19(b) (use Attachment 2, if necessary).

4.4.9 **IF** the nonconforming condition is data which requires that the container be rerun through that characterization activity [e.g., NDA, Real-Time Radiography (RTR)/Visual Examination (VE), HSG, Flammable Gas Analysis (FGA), Gas Generation Testing (GGT)],  
**THEN** the NCR will disposition the container as Reject.

4.4.10 **IF** the nonconforming condition is data, for the container, that will be corrected without rerunning the container through the characterization activity (e.g., NDA, RTR/VE, HSG, FGA, GGT), **THEN** the NCR will disposition the container as Rework.

---

**NOTE**

When Historical NCRs with rework dispositions are encountered during the process of container certification that would have been written as a reject disposition using the clarification of 4.4.9, the NCR is to be revised to change the disposition to reject. This will allow the status of the individual containers to be updated in the NCRM as "Resolved" when the resolution for the drum has been completed.

If corrective actions have been completed prior to the revision of the NCR, the containers may be removed from the NCR but will remain in the NCRM and be resolved in the NCRM based on the clearly stated reason for revision, and provide objective evidence documenting completion of the actions.

---

**NOTE**

NCRs written on containers that have been characterized and the nonconformance identifies that the condition is such that the container associated documentation has to be corrected in order to be certifiable and/or shippable shall have a final disposition of rework. The container and/or applicable BDR will also be administratively controlled in NCRM with a status of NCR Hold until resolution of the nonconforming condition.

---

**NOTE**

Copies of NCRs that are to be included in the applicable BDRs that identify the container as nonconforming, must have an approved disposition before insertion into the BDR.

4.4.11 **IF** the disposition is Rework,  
**THEN** provide instructions for completion of Final Disposition in Block 19(c) (use Attachment 2, if necessary).

4.4.12 **IF** changes to the specifying document are required to reflect the as-built condition,  
**THEN** ensure the disposition requires action to change the specifying document to reflect the accepted nonconformance.

4.4.13 **IF** a document or QA record change is required by the disposition of the nonconformance,  
**THEN** identify in the nonconformance documentation.

- 4.4.14 **WHEN** a document or QA record is changed,  
**THEN** ensure that the justification for the change references the nonconformance documentation.

---

**NOTE**

Dispositions for Repair, Rework, and Actions to Prevent Recurrence (if applicable) **MUST** identify all actions to completely resolve the nonconforming condition. The Responsible Manager/individual may assign completion dates for required actions to meet project requirements/commitments. Repair is defined as the process of restoring a nonconforming characteristic to a condition such that the capability of an item to function reliably and safely is unimpaired, even though the item still does not conform to the original requirement. Rework is defined as the process by which an item is made to conform to original requirements by completion or correction.

---

- 4.4.15 Evaluate the need for Actions to Prevent Recurrence (Repair and Rework), **AND** document action in Block 19(d) (use Attachment 2, if necessary).
- 4.4.16 Identify any additional approval requirement, if applicable, **AND** record in appropriate block(s).
- 4.4.17 Print name, sign, and date in Block 20, **AND** forward the NCR to the CCP QA Engineer.

**CCP QA Engineer or Designee**

---

**NOTE**

Designees are only allowed to review and sign NCRs that are assigned Trend Code K. All other NCRs must be reviewed and signed by CCP QA.

---

- 4.4.18 Review the NCR and determine the following:
- [A] The disposition (Interim and/or Final) adequately addresses measures to be taken to correct the identified deficiency.
  - [B] The disposition (Interim and/or Final) has been completed in accordance with Section 4.4.
  - [C] Actions to prevent recurrence (as applicable) address adequate measures to control recurrence.
  - [D] Assure any attachments have been completed as required by Section 4.10.

- 4.4.19 **IF** disposition is deemed appropriate,  
**THEN** approve by completing Block 16 (Interim) or Block 21 (Final),  
**AND GO TO** step 4.4.21.
- 4.4.20 **IF** disposition is deemed to be deficient,  
**THEN** make recommendations, resolve with the Responsible  
Manager, **AND** reprocess per Section 4.4.
- 4.4.21 **IF** the NCR is written by the Data Generation Level (DGL) against a  
container/BDR,  
**THEN** make a copy of the validated and dispositioned NCR, **AND**  
submit a copy to the appropriate DGL process to be included in the  
BDR **OR**, if an NCR revision, to be submitted as an update to the  
BDR.
- 4.4.22 **IF** the NCR is written by the CCP Project Office against a  
container/BDR during CCP-TP-001 review,  
**THEN** make a copy of the validated and dispositioned NCR, **AND**  
forward a copy to the SPM to be included in the BDR.
- 4.4.23 **IF** the NCR is written by the CCP Project Office against a  
container/BDR, **AND** corrective actions are required to be  
completed at DGL that correct data in an existing BDR,  
**THEN**, at DGL, include a copy of the validated and dispositioned  
NCR with the corrected data as an update to the BDR.

4.4.24 Forward the NCR to the NCR Coordinator for processing.

4.5 NCRM Update

**NCR Coordinator**

4.5.1 Upon receipt of the NCR, perform the following:

- [A] Update the NCR in NCRM.
- [B] Retain the NCR, and any attachments, in a working file until  
NCR closure.

4.6 Disposition Completion

**Responsible Manager/Vendor Project Manager/CCP Site Project  
Manager**

4.6.1 Monitor disposition completion to assure timely completion.

**Responsible Manager**

- 4.6.2 Upon completion of the required dispositions (Interim and/or Final), request the original (if necessary) from the NCR Coordinator.
- 4.6.3 Provide objective evidence of completion of disposition (Interim, Final, and/or Actions to Prevent Recurrence) by one or more or any combination of the following:
- [A] Attachments prepared as required by Section 4.10.
  - [B] Reference to traceable documentation that substantiates completion of dispositions and actions to prevent recurrence.
  - [C] Statement(s) of Fact, signed and dated (Attachment 2, if necessary) or included as attachment.
- 

**NOTE**

Discussions with the SPM may be conducted to review the documentation that substantiates completion of dispositions prior to formal submittal in order to ensure that the documentation is adequate.

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- 4.6.4 Document in an attachment prepared as required by Section 4.10 or on Attachment 2 (step 4.6.3) that substantiates completion of dispositions (as applicable).
- 4.6.5 Print name, sign, and date Block 17 (Interim) and/or Block 22 (Final), **AND** submit original NCR with attachments (if applicable) to the CCP QA Engineer.
- 4.7 Completion Verification and Closure

**CCP QA Engineer**

---

**NOTE**

Although nonconforming items may, under certain controlled circumstances, be allowed to continue through normal processing with an open NCR, the approved disposition(s) must always be implemented **AND** verified prior to NCR closure.

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- 4.7.1 Review the NCR and verify the following:
- [A] Attachments provide traceability to objective evidence substantiating completion of disposition.
  - [B] Documentation provides adequate objective evidence of completion of disposition.

[C] Attachments (if applicable) have been completed as required by Section 4.10.

[D] Review the NCR and all attachments (if applicable) to assure conformance to applicable requirements.

4.7.2 Record the Attachment number(s) in Block 23 as needed. If no attachments, enter N/A.

4.7.3 **IF** Interim disposition **AND/OR** other requirements per step 4.7.1 are satisfactorily completed, **THEN** print name, sign, and date in Block 18, **OR** continue to step 4.7.4 for Final Disposition.

4.7.4 **IF** Final Disposition, **THEN** ensure removal of all CCP HOLD TAGS, as required, either by removing them personally or in coordination with the VPM or Designee. Reconciliation will be so noted by checking the box in Section 24 of Attachment 1 prior to closing the NCR.

[A] **IF** reconciliation identifies missing tags, **THEN** immediately notify the SPM/VPM.

---

**NOTE**

Checking the appropriate box in Section 24 [(a) or (b)] of Attachment 1 is confirmation that CCP QA has validated the basis for the removal of CCP HOLD TAGS and has verified that all CCP HOLD TAGS have been removed/reconciled, as applicable. This must be completed prior to proceeding to step 4.7.5.

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**NOTE**

NCRs, revised, **AND/OR** voided at DGL **OR** Project Level that are written against containers/BDRs **MUST** be submitted as an update to the applicable BDR(s) (except as identified in the note below) to ensure adequate Project Level reviews are conducted.

---

---

**NOTE**

For NCRs that were written against a container and associated BDR and later corrected in another BDR, including a copy of the closed NCR in the original BDR is **NOT** required.

---

4.7.5 Print name, sign, and date in Block 25.

---

**CCP QA Engineer**

4.7.6 **IF** disposition (Interim **OR** Final) **AND/OR** other requirements per step 4.7.1 are **NOT** satisfactorily completed, **THEN** return to Responsible Manager (with detailed reasons for return) for correction and resubmittal.

4.7.7 Determine any distribution requirements as identified in applicable interface documents.

4.7.8 Forward the closed NCR and applicable attachments to the NCR Coordinator for processing.

4.8 Closeout

**NCR Coordinator**

4.8.1 Upon receipt of the closed NCR, perform the following:

[A] Update the NCR in the NCRM.

[B] Distribute as required.

[C] Submit the completed NCR with attachments, if applicable, to CCP Records in accordance with CCP-QP-008, *CCP Records Management*.

4.9 Voiding

**Originator/CCP QA Engineer**

4.9.1 **IF** an NCR is determined to be invalid during the review in accordance with Section 4.2 (prior to NCR validation), **THEN** perform the following:

[A] On the NCR, document the detailed justification for voiding, **AND** ensure that signatures by the NCR Originator and the CCP QA Engineer are obtained.

[B] Forward the NCR to the NCR Coordinator.

[C] GO TO step 4.9.3.

**Responsible Manager/Site Project Manager/CCP QA Engineer/NCR Originator**

4.9.2 **IF**, at any time after NCR validation, the NCR Originator, the SPM, the Responsible Manager, and the CCP QA Engineer agree that it is appropriate to void a validated NCR,  
**THEN** perform the following:

- [A] On the NCR, document the technical justification for voiding, **AND** ensure that signatures by the NCR Originator, the SPM, the Responsible Manager, and the CCP QA Engineer are obtained.
- [B] Stamp or write "void" on the first page of the NCR, initial, and date.
- [C] Forward the NCR to the NCR Coordinator.

**NCR Coordinator**

4.9.3 Update the NCR Log identifying that the NCR is voided.

4.9.4 Input the NCR into NCRM.

4.9.5 Submit voided NCR to CCP Records in accordance with CCP-QP-008.

4.10 Attachments

**NCR Originator/SPM/CCP QA Engineer/Responsible Manager**

4.10.1 When using attachments for an NCR, perform the following:

- [A] Identify the NCR number and revision number on each page of the attachment.
- [B] Identify the attachment number.
- [C] Paginate each page of the attachment.

EXAMPLE:

NCR-LANL-0700-06, Rev 0, Attachment 1,  
Page 1 of 1

NCR-SRS-0800-06, Rev 1, Attachment 3, Page 1 of 6,  
2 of 6, etc.

**NOTE**

Before validation (Block 9), technical changes may be lined through and the correct data entered, initialed, and dated.

Editorial changes that DO **NOT** affect technical content may be lined through and the correct data entered, initialed, and dated during the life cycle of the NCR.

Technical changes are defined as container and BDR identifications, Interim/Final Dispositions, Actual Conditions, and Requirements. Redistribution will be required.

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4.11 Revisions and Corrections

**NCR Originator/SPM/Responsible Manager**

4.11.1 After approval of the NCR, any changes to technical content shall require a revision and will be performed as follows:

- [A] Apply next sequential revision number to all pages of the NCR and all attachments.
  - [B] Record the reason for revision for the changes in Block 7c or use the Attachment 2, if necessary.
- 

**NOTE**

When superseding the revision, the word 'superseded' should be written on the first page of the document per CCP-QP-008.

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- [C] Supersede the previous revision by drawing a diagonal line across the first page of the NCR, **AND** adding a statement, "Superseded by Revision # (next sequential revision #)", **AND** initial and date.
- [D] Attach the superseded revision to the new revision.
- [E] Submit new revision for review and approval in accordance with Section 4.2.

4.12 NCR Log Reconciliation - CCP Project Office and Host Site

**NCR Coordinators/CCP QA Engineer**

4.12.1 At the end of the calendar year, reconcile NCR numbers issued with NCR logs maintained at Host sites (where applicable), the NCR Log, and the NCRM, as follows:

**CCP QA Engineer:**

- [A] Verify that all NCR numbers issued and that appear in the Host Site Log are accounted for in the NCRM.
- [B] Resolve all discrepancies identified with the NCR Coordinator.
- [C] Prepare **AND** submit a report to the NCR Coordinator that documents the reconciliation effort.

**NCR Coordinator**

4.12.2 Reconcile NCR numbers issued to the CCP QA Engineer at Host sites with the NCR Log, based on the report submitted by the CCP QA Engineer.

4.12.3 Annotate any NCR numbers **NOT** used during the year as “Number Not Used” in the Report.

4.12.4 Submit the NCR Reconciliation Report to CCP Records in accordance with CCP-QP-008.

4.13 Work Suspension/Stop Work

4.13.1 During Normal Work Activities

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**NOTE**

Any CCP employee having a concern for employee safety, the safety of the environment, or the quality of the activity has the responsibility and authority to suspend the performance of that activity.

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**Personnel Performing Work**

- [A] **IF** work **CAN NOT** be accomplished as described in a procedure **OR** accomplishment of such work would result in an undesirable situation, a condition adverse to quality, or an unacceptable safety risk, **THEN** suspend work in a safe configuration, **AND** inform the Lead Operator (LO) or VPM.

**Lead Operator/Vendor Project Manager**

- [B] Resolve the concerns of the employee or inform the SPM of the work suspension and the reason it is suspended.

**CCP Management**

- [C] Resolve the concerns prior to resuming operation **OR** initiate actions to correct the condition using existing procedures. In either event, the employee raising the concern will be kept informed of actions being taken in response to the concern.
- [D] Initiate the appropriate documentation per CCP-QP-004, CCP-QP-005, and CCP-QP-006, as applicable to the situation.

4.13.2 During Development of Corrective Actions

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**NOTE**

In accordance with CCP-QP-004, corrective actions developed in response to significant conditions adverse to quality require a documented determination whether to suspend work. Corrective actions in response to conditions adverse to quality will give consideration to the advisability of suspending work.

---

**CCP Management/CCP QA**

- [A] During evaluation of significant conditions adverse to quality in accordance with CCP-QP-004, document the determination whether to suspend work.
  - [A.1] **IF** the decision is to suspend work, **THEN** issue a written directive (e.g., memo, e-mail, Standing Order) to the SPM, VPM, or other cognizant personnel, identifying the work to be suspended.
- [B] Document the actions to be taken or conditions to be met before the restart of suspended work.
- [C] Resolve deficient conditions, as applicable, to allow restart of suspended work.

**CCP QA**

- [D] During review of the documentation for the significant condition adverse to quality, approve the corrective actions needed to restart suspended work.
- [E] Verify completion of corrective actions needed to allow restart of the suspended work.

**Site Project Manager**

- [F] **WHEN** all corrective actions have been completed and verified,  
**THEN** direct restart of suspended work.

4.13.3 CBFO Stop Work Orders

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**NOTE**

CBFO is authorized to issue Stop Work Orders for the protection of the environment and health and safety of CCP employees and the public.

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**CCP Personnel**

- [A] Immediately comply with the terms of any Stop Work Order issued by the CBFO.

**CCP Management**

- [B] Accept direction set forth in CBFO Stop Work Orders and carry out such directives in a safe and responsible manner in accordance with established procedures.

## 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 Records

- [A] Attachment 1, CCP Nonconformance Report (NCR)  
(Supporting Documentation if applicable)
- [B] Attachment 2, CCP Nonconformance Report (NCR)  
Continuation Sheet (if applicable)
- [C] CBFO Notifications (if applicable)
- [D] NCR Reconciliation Report
- [E] CCP NCRM Database
- [F] Written Directive to suspend work (e.g., memo, email)

Attachment 1 – CCP Nonconformance Report (NCR)		
<b>NCR No.</b>		<b>Revision</b>
1. Lot No./Heat No. or Serial No. (as applicable):	2. Process (e.g., NDA, HSG, NDE, VE, Other):	3. Batch Data Report #(s):
4. Order/Work Order/Job Control Number (as applicable):	5. PO # (as applicable):	Container #(s):
	6. Supplier (as applicable):	
<b>DESCRIPTION OF NONCONFORMANCE</b>		
7. (a) NCR Description: <input type="checkbox"/> < 100 nCi/g <input type="checkbox"/> Prohibited Item <input type="checkbox"/> >500 ppmv Flamm. VOCs  <input type="checkbox"/> E-Flag <input type="checkbox"/> Receipt Inspection <input type="checkbox"/> Transportation <input type="checkbox"/> WWIS/WDS <input type="checkbox"/> Other		
7. (b) Description of Nonconformance Required Condition (Implementing Procedure, Revision, Section, & Text):		
7. (c) Actual Condition		
8. NCR Originator (Print name, sign, and date)		9. CCP QA Engineer or Designee Validation (Print name, sign, and date)
9a. Does the identified condition have the potential to impact AK? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> INDETERMINATE If YES or INDETERMINATE, then apply Trend Code L in Block 12.		
9b. Have the CCP HOLD TAGS associated with the NCR been applied? <input type="checkbox"/> YES <input type="checkbox"/> NO   If no is marked, provide an explanation.		
10. Significant Condition? (If Yes, List CAR) <input type="checkbox"/> YES <input type="checkbox"/> NO		11. Recurring Condition? <input type="checkbox"/> YES <input type="checkbox"/> NO (If YES, List NCRs/CARs)
12. Trend Code:		13. Responsible Manager:

Attachment 1 – CCP Nonconformance Report (NCR)	
<b>NCR No.</b>	<b>Revision</b>
<b>INTERIM DISPOSITION</b>	
14. Interim Disposition (Check One)	
<input type="checkbox"/> N/A (See Final Disposition) <input type="checkbox"/> Hold <input type="checkbox"/> Conditional Accept <input type="checkbox"/> Conditional Use <input type="checkbox"/> Sort <input type="checkbox"/> Reinspect/Retest <input type="checkbox"/> Remediate	
(a) Instructions for Completion of the Interim Disposition:	
<b>INTERIM DISPOSITION APPROVALS</b>	
15. Responsible Manager/Individual (Print, sign, and date)	16. CCP QA Engineer or Designee (Print, sign and date)
Additional Approvals: (Print, sign and date)	Additional Approvals: (Print, sign and date)
<b>COMPLETION OF INTERIM DISPOSITION</b>	
17. Interim Disposition Complete Responsible Manager/Individual: (Print, sign and date)	
18. Interim Disposition Verified CCP QA Engineer: (Print, sign and date)	

Attachment 1 – CCP Nonconformance Report (NCR)	
<b>NCR No.</b>	<b>Revision</b>
<b>FINAL DISPOSITION</b>	
19. Final Disposition (Check One) <input type="checkbox"/> Use-As-Is <input type="checkbox"/> Reject <input type="checkbox"/> Repair <input type="checkbox"/> Rework <input type="checkbox"/> Scrap (a) Technical Justification (Required for Use-As-Is and Repair dispositions, N/A for Reject, Scrap, or Rework dispositions.)	
(b) Disposition Instructions (Required for Reject and Scrap, N/A for Use-As-Is, Rework, and Repair)	
(c) Instructions for Completion of the Final Disposition, including Inspection Criteria (Required for Repair and Rework, N/A for Use-As-Is, Reject and Scrap)	
(d) Corrective Actions (Actions to Prevent Recurrence) - as required, N/A if left blank.	
<b>FINAL DISPOSITION APPROVALS</b>	
20. Responsible Manager/Individual: (Print, sign, and date)	21. CCP QA Engineer or Designee: (Print, sign, and date)
Additional Approvals: (Print, sign, and date)	Additional Approvals: (Print, sign, and date)
<b>CLOSURE</b>	
22. Final Disposition Complete Responsible Manager/Individual: (Print, sign, and date)	
23. Attachments:	
24. (a) HOLD TAG removal has been validated and reconciled for all nonconforming items on the NCR. <input type="checkbox"/> (b) Check if not applicable (N/A) and provide an explanation here or on a continuation sheet. <input type="checkbox"/>	
25. Final Disposition Verified – NCR Closed	CCP QA Engineer: (Print, sign, and date)

Attachment 2 – CCP Nonconformance Report (NCR) Continuation Sheet				
<b>NCR No.</b>	Revision	Attachment #	Page	of
Continuation from Section Number:				

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