

CCP-QP-021

Revision 7

CCP Surveillance Program

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PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
3	06/03/2002	Section 2.0, Requirements (page 2): Change the first paragraph after the bullets to read as follows: "Planned and periodic surveillance will be conducted to measure item and service quality, process effectiveness, and promote improvement. The organization performing the assessments will have sufficient authority and freedom from the activities being assessed to carry out its responsibilities. Persons conducting surveillances will be qualified in accordance with CCP-QP-002, <i>CCP Training and Qualification Plan</i> , and knowledgeable of the items and activities being assessed."
4	05/24/2004	Revised Sections 1.1, 2.0, 2.3, 2.4, 4.0, 5.0 and Figure 2.
5	11/16/2006	Reengineered Surveillance Program to make it more comprehensive, to ensure findings are identified and tracked, and to ensure consistency amongst CCP Quality Assurance (QA) personnel, and to implement the Waste Isolation Pilot Plant Hazardous Waste Facility Permit-requirements resulting from the Section 311/Remote-Handled (RH) Permit Modification Request (PMR). Addressed Carlsbad Field Office (CBFO) Document Review Record (DRR) comment.
6	12/10/2008	Revised to delete reference to "assessments" incorporate conditions Corrected During Surveillance (CDS) and clarify training and qualification of surveillance personnel.
7	05/07/2010	General revision to clarify follow-up to observations and provide clarity of text.

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1.0 PURPOSE

This procedure establishes the responsibilities and requirements for planning, performing, documenting, and reporting independent surveillances (evaluations) of Central Characterization Project (CCP) transuranic (TRU) waste characterization loading and shipping activities.

1.1 Scope

This procedure applies to CCP organizations and personnel performing surveillances of TRU waste characterization activities. This procedure also applies to CCP facilities being evaluated. Planned and periodic surveillances will be conducted to measure item and service quality, process effectiveness, and promote improvement. The organization performing the surveillance will have sufficient authority and freedom from the activities being evaluated to carry out its responsibilities. Person conducting surveillances will complete a Quality Assurance Surveillance Personnel Qualification Card prepared and approved by required individuals in accordance with CCP-QP-002, *CCP Training and Qualification Plan*, and be knowledgeable of the items and activities being evaluated.

Surveillances will accomplish the following:

- Monitor work in progress;
- Document compliance or noncompliance with established requirements and procedures;
- Identify actual and potential conditions adverse to quality;
- Obtain timely corrective action commitment from cognizant managers for identified conditions adverse to quality;
- Provide notification to responsible managers of the status and performance of work under surveillance; and
- Verify timely implementation of corrective action

All surveillances will have a unique Surveillance (SUR) Number. The Surveillance (SUR) Log, (See Attachment 3, Surveillance [SUR] log, for an example) will provide the following information:

- SUR Number
- Item, activity, or process being evaluated

- Date the surveillance was initiated (Initiation Date)
- Person(s) that initiated the surveillance (Surveillance Lead)

The SUR number system will provide the capability to determine the following:

- Designator for surveillance (SUR)
- Facility identifier (LANL, INL, SRS, ORNL, CCP, etc.)
- Sequential number issued for the organization or facility in that calendar year
- Calendar year issued

Example SUR numbers:

- SUR-LANL-0001-06
- SUR-SRS-0002-06
- SUR-CCP-0013-06

2.0 REQUIREMENTS

2.1 References

Baseline Documents

- DOE/CBFO-94-1012, *U.S. Department of Energy Carlsbad Field Office Quality Assurance Program Document*

Referenced Documents

- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*
- CCP-QP-006, *CCP Corrective Action Reporting and Control*
- CCP-QP-008, *CCP Records Management*
- CCP-QP-014, *CCP Quality Assurance Trend Analysis and Reporting*

3.0 RESPONSIBILITIES

3.1 CCP QA Manager

- 3.1.1 Ensures implementation of the surveillance program as described in this procedure.
- 3.1.2 Approves the surveillance schedule.
- 3.1.3 Ensures that surveillance personnel have successfully completed a Quality Assurance Surveillance Personnel Qualification Card.
- 3.1.4 Ensures surveillance personnel have sufficient authority and organizational freedom to carry out their assigned responsibilities.
- 3.1.5 Assigns Surveillance Lead.
- 3.1.6 Provides information on status and/or findings to the CCP Nonconformance Report (NCR) Coordinator, Corrective Action Report (CAR) Coordinator and Price-Anderson Amendments Act (PAAA) Coordinator.

3.2 Surveillance Lead

- 3.2.1 Selects the Surveillance Team Members and ensures they have been qualified by the CCP QA Manager.
- 3.2.2 Provides information to the surveillance team.
- 3.2.3 Notifies affected organizations of surveillances, as applicable.
- 3.2.4 Develops the surveillance plan.
- 3.2.5 Approves surveillance checklists, when used by surveillance team members.
- 3.2.6 Organizes and directs the surveillance.
- 3.2.7 Reports the surveillance results.
- 3.2.8 Follows up on observations and findings identified in previous surveillances.

3.3 Surveillance Team Members

- 3.3.1 Identifies the criteria to be used during the surveillance.

3.3.2 Develops the surveillance checklist(s), if applicable, under the direction of the Surveillance Lead.

3.3.3 Informs the Surveillance Lead of progress and/or problems with assigned tasks periodically during the surveillance.

3.3.4 Notifies the Cognizant Manager/Surveillance Lead if conditions are identified that are believed to be unsafe.

3.4 Surveillance Coordinator

3.4.1 Develops and maintains a surveillance schedule.

3.4.2 Develops and maintains a Surveillance (SUR) Log Example provided as Attachment 3, Surveillance Log).

3.4.3 Develops and maintains surveillance schedules that contain the anticipated surveillances for a specific time frame.

3.4.4 Prepares copies of the surveillance schedules for record or contract deliverable purposes, as necessary.

3.5 Cognizant Manager of Area Evaluated

3.5.1 Provides timely corrective action for conditions adverse to quality and tracks and follows up on Observations identified during the surveillance.

3.6 NCR/CAR Coordinator

3.6.1 Enters NCR/CAR data into the CCP Data Center or the WIPP Commitment Tracking System (CTS) for tracking and follow-up-purposes.

4.0 PROCEDURE

CCP QA Manager

- 4.1 In conjunction with CCP Management, determine areas/activities to be evaluated.

Surveillance Coordinator

- 4.2 Prepare and maintain the surveillance schedule based on CCP QA and CCP Management input, **AND** obtain CCP QA Manager approval.

CCP QA Manager

- 4.3 Approve the surveillance schedule.

NOTE

The CCP QA Manager's signature on correspondence transmitting surveillance schedules to CCP Management will constitute the CCP QA Manager's approval of surveillance schedules and assignment of Surveillance Leads.

- 4.4 Assign a Surveillance Lead.

Surveillance Lead

- 4.5 Obtain a SUR Number from the Surveillance Coordinator.

NOTE

The following should be considered when selecting Surveillance Team Members:

- Personnel having direct responsibility for performing the activities being evaluated shall **NOT** be involved in the selection of the team.
 - Surveillance Team Members shall have requisite authority to perform surveillances, and shall be independent from the organization being evaluated.
 - During surveillance, technical specialists shall be used when evaluating the adequacy of technical processes.
 - The Surveillance Lead will ensure that technical specialists are knowledgeable of the technical processes being evaluated, and that specialists receive the same instructions as other team members.
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- 4.6 Select Surveillance Team Members (as needed) based on the scope, complexity, or special nature of the work being evaluated, technical expertise, availability, experience, and the prospective member's ability to

provide an objective contribution.

- 4.7 Ensure that the Surveillance Team Members collectively have appropriate training and experience commensurate with the scope of the surveillance.
- 4.8 Prepare the Surveillance Plan (Example provided as Attachment 1, Surveillance Plan) to include the elements specified.
- 4.9 Review, with Surveillance Team members, any plan generated, pertinent background information including previous surveillance or oversight results, applicable procedures, and applicable technical documents to familiarize Surveillance Team members with the work being evaluated.
- 4.10 Notify the cognizant organization(s) of the surveillance date and the purpose of the surveillance.

Surveillance Team Members

- 4.11 Prepare surveillance checklists (as appropriate) listing the elements to be evaluated.
- 4.12 Evaluate the applicable quality program element(s) by examining objective evidence, observing activities in progress, examining items (including components, specimens, and machinery, etc.), and/or interviewing personnel responsible for the activity. Include technical evaluations of the applicable procedures, instructions, activities, and items, as appropriate.
- 4.13 Evaluate the objective evidence related to the planning and technical aspects of work performance to the depth necessary to determine if these elements are being implemented effectively.
- 4.14 Review previous corrective actions, as applicable, to evaluate implementation and effectiveness when recurring problems are found.
- 4.15 Review applicable documents, standards, and criteria pertaining to the process to be evaluated.
- 4.16 Observe, to the extent possible, actual operations to verify conformance to requirements.
- 4.17 Conduct interviews with selected personnel having knowledge of the activity or area of evaluation.
- 4.18 Document the results of the surveillance with sufficient detail to allow preparation of the surveillance report including but not limited to objective evidence examined and personnel interviewed:

- 4.19 Inform the Surveillance Lead of progress and/or problems with assigned tasks periodically during the surveillance.
- 4.20 Notify the Cognizant Manager/Surveillance Lead if conditions are identified that are believed to be unsafe.

Surveillance Lead

- 4.21 Notify the CCP QA Manager and the management of the cognizant organization as soon as practicable if conditions are discovered that could have a significant adverse impact on prior work or affect work in progress, or if conditions require prompt attention.
- 4.22 If applicable, prepare NCRs or CARS in accordance with CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control* or CCP-QP-006, *CCP Corrective Action Reporting and Control*.
- 4.23 Brief management of the cognizant organization.
- 4.24 Prepare the formal surveillance report following the guidance in the Surveillance Report (Example provided as Attachment 2, Surveillance Report) and include the following elements, as applicable:
- Identify findings which are conditions that deviate from the requirements, with sufficient detail to enable corrective actions to be taken by the cognizant organization, and subsequent closure by CCP QA. Briefly state the requirement(s) applicable to the deficiencies cited. Group findings of a common nature together whenever possible so that systematic problems can be identified.
 - If observations are identified, state that conditions observed, and if not addressed, could deteriorate into a finding.
 - Provide recommendations that could strengthen the existing program or process.
 - Include in the report descriptions of all actions taken to resolve conditions, and identify those conditions as being corrected during the surveillance (CDS).
- 4.25 Submit to the CCP QA Manager for review and approval.

CCP QA Manager

- 4.26 Review the surveillance report and resolve any issues with the Surveillance Lead.

NOTE

The preferred system for tracking CCP Surveillances is the CCP Data Center. However, if the system is unavailable for Surveillance Tracking, use of the WIPP CTS is acceptable.

- 4.27 Approve and issue the surveillance reports to CCP management, the PAAA Coordinator, the NCR/CAR Coordinator for input into the CCP Data Center or the WIPP CTS, the Surveillance Coordinator for scheduling activities, the Surveillance File (CCP Records), and the cognizant Subcontract Technical Representative (STR) for the Host site.

NCR/CAR Coordinator

- 4.28 Make a separate entry for each finding (NCR/CAR) identified in the report into the CCP Data Center or the WIPP CTS.

Cognizant Manager of Surveilled Area

- 4.29 Ensure timely and effective corrective actions in response to CARs or NCRs or other conditions requiring resolution resulting from the surveillance.
- 4.30 Work with the Surveillance Lead and the CCP QA Manager to resolve issues regarding necessary corrective actions.
- 4.31 Upon completion of corrective actions associated with surveillance, inform the NCR/CAR Coordinator and the Surveillance Coordinator.

Surveillance Lead/CCP QA Manager

- 4.32 Track the progress of corrective actions required by any CAR or NCR written as the result of the surveillance.

Surveillance Coordinator

- 4.33 Upon completion of corrective actions associated with surveillance, inform the NCR/CAR Coordinator.
- 4.34 Update the Surveillance Schedule and Log (Attachment 3).

5.0 RECORDS

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

5.1.1 QA/Nonpermanent

[A] Surveillance File which includes the following:

- Surveillance Notification, if applicable
- Surveillance Plan
- Surveillance Checklist(s), if applicable
- Surveillance Report(s)

[B] Surveillance (SUR) Log

[C] Surveillance Schedule

Attachment 1 – Surveillance Plan (Example)

SURVEILLANCE PLAN

Surveillance Number:

Organization to be Evaluated:

Location:

Surveillance Dates:

Surveillance Team:

Scope:

Applicable Requirements Documents:

Attachment 2 – Surveillance Report (Example)

SURVEILLANCE REPORT
SUR-XXXX-####-##
Central Characterization Project
Surveillance Number:

- I. SUMMATION OF RESULTS**
- II. SURVEILLANCE SCOPE**
- III. CRITERIA**
- IV. PERSONNEL CONTACTED**
- V. FINDINGS (NCR/CAR)**
- VI. ISSUES CORRECTED DURING THE SURVEILLANCE**
- VII. CONCERNS PREVIOUSLY IDENTIFIED**
- VIII. OBSERVATIONS**
- IX. RECOMMENDATIONS**
- X. OBJECTIVE EVIDENCE**

SURVEILLANCE LEAD _____ **DATE** _____

CCP QA MANAGER _____ **DATE** _____

