

WP 13-QA3004

Revision 11

Nonconformance Report

Management Control Procedure

EFFECTIVE DATE: 10/20/09

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APPROVED FOR USE

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INTRODUCTION ^{1,2}

This procedure describes the activities, responsibilities, and documentation necessary for identifying, controlling, resolving, determining dispositions, and verifying corrective actions of nonconforming items, materials, and products. In addition, this procedure controls items that are not nonconforming or quality indeterminate, but are awaiting documentation review and/or U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) evaluation and need to be controlled. Nonconforming items, materials, or products are those with a deficiency in characteristic or record that renders the quality unacceptable or indeterminate.

Identification and control of nonconforming items, materials, and products is the responsibility of all Washington TRU Solutions LLC (WTS) personnel and subcontractors contractually obligated to this procedure.

Control of nonconforming items, materials, and products includes tracking, trending, verification of disposition/resolution, revision, closeout, and retention of records. Nonconforming items will be controlled by Quality Assurance (QA) through the use of a Nonconformance Report (NCR) hold tag, and by placing the item in the nonconforming hold area when practical. Items and materials that do not conform to specified requirements, or whose conformance is indeterminate, will be controlled to prevent inadvertent installation or use.

The NCR process shall be used to document, control, and disposition suspect/counterfeit items (S/CIs) detected in Waste Isolation Pilot Plant (WIPP) systems or during receipt processes as described in WP 13-QA.05. WP 13-QA.05, Attachment 2, Suspect/Counterfeit Items Program QA Checklist, **shall** be completed as part of the NCR closure process.

QA will oversee the NCR process through closure, and will retain the record copy in accordance with the department's Records Inventory and Disposition Schedule. The following are records generated by the performance of this procedure:

- Attachment 2, NCR Hold Tag Log and Verification Sheet
- Attachment 3, QA Hold Tag Log and Verification Sheet
- EA13QA3004-1-0, Nonconformance Report
- NCR supporting documentation

REFERENCES

BASELINE DOCUMENT

- DOE G 414.1-3, Suspect/Counterfeit Items Guide for Use with 10 CFR 830 Subpart A, Quality Assurance Requirements and DOE O 414.1B Quality Assurance

- WP 13-1, Washington TRU Solutions LLC Quality Assurance Program Description

REFERENCED DOCUMENTS

- Title 10 *Code of Federal Regulations* (CFR) Part 21, "Reporting of Defects and Noncompliance"
- 10 CFR Part 71, "Packaging and Transportation of Radioactive Material"
- 10 CFR §71.95, "Reports"
- DOE G 414.1-3, Suspect/Counterfeit Items Guide for Use with 10 CFR 830, Subpart A, Quality Assurance Requirements and DOE O 414.1B, Quality Assurance
- DOE/WIPP 02-3183, CH Packaging Program Guidance
- DOE/WIPP 02-3283, RH Packaging Program Guidance
- DOE/WIPP-06-3336, CNS 10-160B RH Cask Program Guidance
- WP 02-AR3001, Unreviewed Safety Question Determination
- WP 04-IM1000, Issues Management Processing of WIPP Forms
- WP 08-NT3105, Transportation "Out-of-Service" Tags
- WP 08-PT3005, Nuclear Regulatory Commission Reporting Requirements for Type B Packaging
- WP 09, Engineering Conduct of Operations
- WP 09-CN3007, Engineering and Design Document Preparation and Change Control
- WP 13-QA.05, Suspect/Counterfeit Items Program
- WP 15-PC3041, Approval/Variation Request Processing
- WP 15-PM3526, Receipt Discrepancies
- EA04IM1000-1-0, WIPP Form
- EA10-2-1-0, Action Request
- EA13QA3004-1-0, Nonconformance Report

PRECAUTIONS AND LIMITATIONS

- Nonconforming items and materials that affect the safety of personnel, or the environment, must be corrected immediately, or mitigating actions taken immediately, to ensure the safety of personnel and the environment.
- NCRs are limited in scope to remedying the nonconforming and/or quality indeterminate condition of an item, material, or product. Corrective actions for programmatic issues, including multiple occurrences of similar nonconforming conditions, should be addressed through the use of a WIPP Form (EA04IM1000-1-0) in accordance with WP 04-IM1000.
- Transportation "Out-of-Service" (OOS) Tags are specifically used for identifying and controlling Type "B" packaging and trailers for out-of-service conditions at the WIPP Site only. OOS tags can not be used for tagging packaging or trailer parts. (Reference WP 08-NT3105)
- WP 08-PT3005 establishes the reporting requirements for WTS to report any significant reductions in effectiveness in Type B packaging, or instances which the conditions of approval in Certificate of Compliance (C of C) were not observed in making a shipment, in accordance with Title 10 CFR §71.95, "Reports." Nonconformances related to defects or failure to comply with requirements applicable to U.S. Nuclear Regulatory Commission (NRC) licensed packaging (e.g., TRUPACT II, RH TRU 72-B, CNS 10-160B) shall be reported to the CBFO Office of the National TRU Program. WTS shall evaluate issues and nonconformances for reporting to the NRC, under Title 10 CFR Part 21 or Part 71 and provide the results of the evaluation to CBFO.
- WP 09 incorporates the engineering protocol for determination of NCRs that are subject to USQ screening/evaluation. Nonconformance Report(s) (NCRs) that identify discrepant as-found conditions require an Unreviewed Safety Question (USQ) screening/evaluation in accordance with WP 02-AR3001. NCR dispositions leading to a design change will receive a USQ review via the engineering change process. Type "B" packaging is exempt from the USQ process.
- Discrepant material/equipment identified during the initial receipt and/or receipt inspection processes at the warehouse will be documented and resolved through the use of a Receipt Discrepance Report (RDR) in accordance with WP15-PM3526. An NCR will be required for discrepant items to be retained and dispositioned for use by WTS and subcontractors obligated to this procedure.

NOTE

"Item" is an all-inclusive term used in place of any of the following: appurtenance, assembly, component, equipment, material, module, part, structure, subassembly, subsystem, system, unit, or support systems. Item may also refer to samples, software, or data.

NOTE

Packaging items, parts, or components which are not correctable using DOE/WIPP 02-3183, DOE/WIPP 02-3283, DOE/WIPP-06-3336, or work instructions are evaluated by the contact-handled/remote-handled (CH/RH) Packaging Engineer for resolution. Discrepant conditions not corrected per the work instructions are entered into the Computerized History and Maintenance Planning System (CHAMPS) in the Deferred Maintenance module. After receipt of the packaging, an evaluation of the noted discrepant condition is performed to determine what repairs are required. This evaluation can be accomplished by the CH/RH Packaging Engineer at the WIPP Site or the maintenance vendor's facility, as appropriate.

PERFORMANCE**1.0 IDENTIFYING IF AN NCR IS REQUIRED**

1.1 Nonconforming items, materials, or products are those with a deficiency in characteristic or record that renders the quality unacceptable or indeterminate such that the item cannot perform its intended function. This does not include nonconforming conditions resulting from anticipated wear-and-tear.

1.1.1 The Plan of the Day (POD) working group *may* initiate a Request-for-Evaluation (RFE) to determine **if** the equipment and/or item represents a nonconforming condition or anticipated wear-and-tear (Reference EA10-2-1-0, Instructions for Completing Action Request (AR) Form).

1.2 Cognizant individual, determine if an NCR is required. If any of the following conditions exist, proceed to Section 2.0 to issue the NCR:

- Identification of equipment failures (including imminent failures) considered sudden or unexpected, or outside the anticipated performance history of the item (e.g., equipment failures before end of life cycle) are considered nonconforming.
- Equipment and/or item malfunction, damage or degradation, other than anticipated wear-and-tear, is considered to be nonconforming **if** it cannot perform its intended function and does not meet specified requirement(s) related to materials, dimensions, configuration, operation, or content.

- Equipment and/or item condition(s) that represent indeterminate quality or is found to be suspect (i.e., S/CI) are considered nonconforming.
- Discrepant material/equipment identified during the initial warehouse and/or receipt inspection process will require an NCR if the material/equipment is to be retained and dispositioned for use.
- Equipment and/or item condition(s) determined to include a discrepant "as-found" state (i.e., a condition where the plant configuration does not match the Documented Safety Analysis) are considered nonconforming.
- Discrepant equipment and/or Items will require an NCR if Section(s) 2 or 3 of Action Request Form (EA10-2-1-0) document a nonconforming condition.

1.3 Cognizant individual, determine if an NCR is not required by evaluating each of the following conditions. If an NCR is not required, exit the procedure.

- Discrepant equipment and/or item malfunction, damage or degradation is a result of anticipated wear-and-tear (Reference EA10-2-1-0).
- Discrepant material/equipment identified during initial warehouse and/or receipt inspection process is controlled through a Receipt Discrepancy Report (RDR) in accordance with WP 15-PM3526.
- When material/equipment rework was previously anticipated (i.e., tagged out-of-service) **and** instructions for rework have been incorporated into a work order and/or a pre-approved work package.
- Facility restoration/construction items (prior to final acceptance) identified during walk-downs that are controlled through an official "punch list."

2.0 DEVELOPMENT

2.1 NCR Initiator, notify the Cognizant Individual(s) (i.e., engineer, buyer, etc.) that a nonconformance has been identified, and provide applicable information relating to the nonconforming condition.

- 2.2 If the nonconforming item, material, or product poses a threat to the environment, personnel, or facilities, perform the following:
- 2.2.1 NCR Initiator, notify the Facility Shift Manager (FSM) and the Cognizant Engineer/Individual, as appropriate.
- 2.2.2 FSM, perform the following:
- [A] Immediately place the affected equipment in a safe condition.
- [B] Prevent further use or processing.
- 2.2.3 Cognizant Engineer/Individual, coordinate with QA to expedite the placement of a hold tag(s) in accordance with Section 8.0.

NOTE

The NCR number is based on the fiscal year and a sequential number for traceability and is issued by the QA/NCR Coordinator. The NCR number will also be used as the NCR hold tag(s) number. When more than one hold tag is needed, then a sequential number will be added to the NCR number that is applied to the hold tag (e.g., FY2006-003-1, FY2006-003-2).

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- 2.3 NCR Initiator, complete top portion (header) and Section A (applicable sections) of the NCR.
- 2.3.1 Contact Quality Engineer/NCR Coordinator for NCR number and record on NCR.
- 2.3.2 Clearly identify and describe the characteristics that do not conform to specified criteria.

The nonconformance description shall reflect the discrepant "as found" condition.

NOTE

Additional time will be required to process NCRs that are delivered by the Plant Mail System.

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- 2.4 NCR Initiator, print name, sign, and date the NCR, and forward it to the NCR Coordinator.

3.0 ISSUANCE

- 3.1 NCR Coordinator, stamp the NCR "ORIGINAL."
- 3.2 Quality Engineer/NCR Coordinator, review Section A of the NCR for concurrence that it meets the NCR criteria, adequately describes the nonconformance, and identifies the item(s) affected.
- 3.3 Quality Engineer/NCR Coordinator, if the nonconformance described does not meet the criteria for issuance of an NCR, discuss the condition with the NCR Initiator.
 - 3.3.1 If the NCR Initiator agrees the condition does not warrant an NCR, then:
 - [A] Quality Engineer/NCR Coordinator, complete Section B of the NCR.
 - [B] NCR Coordinator, return a copy of the NCR form to the NCR Initiator and file the original rejected NCR.
 - 3.3.2 If the NCR Initiator and Quality Engineer/NCR Coordinator agree the basis of the NCR should be changed, perform the following:
 - [A] NCR Initiator and Quality Engineer/NCR Coordinator, make the appropriate changes to the form.
 - [B] NCR Initiator, inform the cognizant organization manager of the changes (revision not required before original issuance).
- 3.4 If the nonconforming condition meets the criteria for issuance of an NCR, adequately describes the nonconformance, identifies the item(s) affected, and reflects the "as found" condition, Quality Engineer/NCR Coordinator perform the following:
 - 3.4.1 Forward a copy of the NCR to Nuclear Safety to perform a USQ screening/evaluation according to USQD protocol.
 - [A] Submit the NCR for USQ screening/evaluation within two working days.
 - [B] Notify affected organizations, if applicable.
 - 3.4.2 Enter quantity of hold tags issued in Section B of the NCR.
 - 3.4.3 Sign for concurrence in Section B of the NCR.

- 3.5 Quality Engineer/NCR Coordinator, verify the NCR is entered into the Commitment Tracking System (CTS) and document the CTS number in Section B of the NCR.
 - 3.6 Quality Engineer/NCR Coordinator, forward a copy of any NCR involving Type "B" packaging to the Packaging Group for the purpose of screening the nonconformance to determine the need for reporting to the NRC according to the provisions of WP 08-PT3005.
 - 3.7 Quality Engineer/NCR Coordinator, forward a copy of the NCR to the Price-Anderson Amendments Act (PAAA) Coordinator and document date PAAA Coordinator was notified in Section B.
 - 3.8 Quality Engineer/NCR Coordinator, assign an initial response due date in Section C of the NCR.
 - 3.8.1 Cognizant Engineer/Cognizant Individual, if an extension is deemed necessary, contact Quality Engineer/NCR Coordinator for concurrence. Initial extension may be granted at the discretion of the Quality Engineer/NCR Coordinator.
 - 3.8.2 Additional extensions shall require QA Management approval and shall be documented in Section C of NCR.
 - 3.8.3 Quality Engineer/NCR Coordinator, if extension is granted, check applicable extension box(es) in Section C.
 - 3.8.4 NCR Coordinator, if an extension has been granted, notify the Cognizant Individual/Engineer.
 - 3.9 Quality Engineer/NCR Coordinator, forward the original NCR to Cognizant Engineer for disposition.
 - 3.9.1 Cognizant Engineer/Cognizant Individual, notify the Cognizant Buyer identifying any action(s) required from the subcontractor.
- 4.0 PROCESSING
- 4.1 Cognizant Engineer/Cognizant Individual, ensure the following:
 - 4.1.1 Attachments may be added to expand on any section of an NCR to allow proper explanation, objective evidence and/or justification at the discretion of the Cognizant Engineer/Cognizant Individual. Attachments shall include the NCR number, revision level, and appropriate section number to maintain traceability. Fields that are not applicable will be identified by entering "N/A".
 - 4.1.2 Items which do not meet original design requirements and which are dispositioned "use-as-is" or "repair" shall be subject to design

control measures (e.g., WP 09-CN3007), commensurate with those applied to the original design. The as-built records, if required, shall reflect the accepted deviation. The disposition shall identify required changes to documentation, including specifying documents and QA records. Justification for documentation changes shall reference the applicable NCR. The technical justification for the acceptability of a nonconforming item that has been dispositioned "repair" or "use-as-is" shall be documented. The technical justification must be supported by objective evidence upon which the justification is based, at the discretion of the Cognizant Engineer.

- 4.1.3 The disposition of an item to be reworked or repaired shall contain a requirement to reexamine (inspect, test, or conduct nondestructive examination) the item to verify acceptability. Repaired or reworked items shall be reexamined 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. Acceptability of Type B packaging or component NCR disposition(s) is based on the intent of 10 CFR 71.101, where "repair" means to bring the component or package back to SAR compliance.

NOTE

Personnel analyzing and dispositioning nonconformances shall have demonstrated competence in the specific area they are evaluating, have an adequate understanding of the requirements, and have access to pertinent background information

- 4.2 Cognizant Engineer/Cognizant Individual, determine the disposition of the nonconforming item, material, or product, and discuss with responsible organizations in accordance with the following definitions for each disposition:

Scrap - (reject) removing an item from use by destruction or placing the item in a waste receptacle

Return to Supplier - (reject) a cost-effective process to scrap an item and receive credit from the Supplier

Rework - the process by which an item is restored to original specifications by completion or correction

Repair - the process of restoring an item to a condition such that the capability of an item to function reliably and safely is unimpaired even though that item still does NOT conform to the original requirement

Use-as-is - a disposition permitted for a nonconforming item when it can be established that the item is satisfactory for its intended use

Conditional Release - release of a nonconforming item from a controlled hold area when warranted for certain reasons, and with established controls in place to prevent inadvertent use

Reasons:

- Allowing work to proceed that is not directly tied to the nonconforming condition (examples - an item awaiting material certification would be a candidate for conditional release; a broken or damaged item would generally not be a candidate for conditional release).
- Pending evaluation of item nonconformance (reasonable expectation that the nonconforming condition can be resolved).
- Staging of the nonconforming item within its system or physical installation location to allow adjacent construction fit-up or line-up to proceed.

Controls:

- The release of the conditionally released item must not contribute to the nonconformance, or prevent its resolution.
- The conditionally released item must be identified and tracked to allow removal/replacement in the event the nonconformance cannot be resolved.
- The conditionally released item must not affect operability of vital safety systems.
- The conditionally released item must not be irreversibly installed (e.g., welded into place, poured in concrete).
- The conditionally released item must not be pressurized, energized, tested, or placed into service until the Cognizant Engineer has determined these actions are acceptable and has specified the limitations.

S/CI - a disposition of "use-as-is" or "replace" for identified S/CIs, based on engineering evaluation, in accordance with DOE G 414.1-3 or WP 13-QA.05. After initial disposition is determined, the S/CI Coordinator determines final disposition (i.e., destroy, maintain for evidence, dispose per the Inspector General, etc.).

- 4.3 If the nonconforming item is an S/CI, then:
- 4.3.1 Cognizant Engineer/Cognizant Individual, perform the following:
- [A] Check S/CI "Replace" or "Use-as-is" in the Disposition block.
 - [B] Provide details in the Justification block (including replacement schedule and Work Order number).
 - [C] When a Work Order is to be used to disposition S/CI, forward the Work Order to the Quality Engineer for review.
- 4.3.2 S/CI Coordinator, perform the following:
- [A] Process S/CI in accordance with WP 13-QA.05.
 - [B] Check the appropriate disposition in the Suspect/Counterfeit Items box.
 - [C] Sign and enter date in the Suspect/Counterfeit Items box.
 - [D] When a Work Order is to be used to disposition S/CI, review, input hold and witness points, and approve the Work Order.
- 4.4 Cognizant Engineer/Cognizant Individual, perform the following:
- 4.4.1 Determine the extent and impact of the identified nonconformance on other related items, if applicable.
- 4.4.2 Initiate corrective action in accordance with WP 04-IM1000, if necessary.
- 4.4.3 Provide justification for conditional release disposition, if applicable.
- 4.4.4 If Return to Supplier/Rework is identified, perform the following:
- [A] Identify actions required by the Supplier (e.g., Corrective Action Plan).
 - [B] Notify the Cognizant Buyer of the required actions for the purpose of flowing down NCR corrective action requirements to the subcontractor.
 - [C] Identify schedule completion date for Supplier to complete disposition requirements and ensure that the supplier's scheduled completion date is entered into the CTS.
- 4.4.5 Complete Section C of the NCR

- 4.4.6 Print name, sign, and date the NCR.
- 4.4.7 Ensure the correct disposition box (i.e., scrap, rework, repair, etc.) is checked appropriately.
- 4.4.8 Submit the NCR to the Cognizant Manager for review and signature.
- 4.5 Cognizant Manager, if concurring with the disposition, print name, sign, and date the NCR.
- 4.6 Cognizant Engineer/Cognizant Individual, forward a copy of the NCR to Nuclear Safety to perform a USQ screening/evaluation according to USQD protocol, as required.
 - 4.6.1 If the USQD is performed, record USQ number in Section C.
 - 4.6.2 Forward the original NCR to Quality Engineering/NCR Coordinator for review and concurrence.
- 4.7 Quality Engineer/NCR Coordinator, if concurring with the disposition, perform the following:
 - 4.7.1 Print name, sign, and date Section D of the NCR.
- 4.8 Quality Engineer, if the disposition is not concurred with, coordinate disposition resolution with Cognizant Engineer/Individual.
- 4.9 If the nonconformance is an S/CI, perform the following:
 - 4.9.1 Facility Manager Designee (FMD), if an Occurrence Reporting and Processing System (ORPS) report is generated, indicate by checking YES in Section D of the NCR, documenting ORPS report number, initialing, and dating.
 - 4.9.2 FMD, if an ORPS report is not generated, indicate by checking NO in Section D of the NCR, entering a brief explanation, initialing, and dating.
 - 4.9.3 S/CI Coordinator, complete WP 13-QA.05, Attachment 2, Suspect/Counterfeit Items Program QA Checklist, as part of the NCR closure process.
- 4.10 Quality Engineer, when NCR disposition is to be completed by a Work Package, establish hold points in Work Package for verification of NCR disposition.

- 4.11 NCR Coordinator, verify CTS is updated to ensure timely completion of item disposition:
- Corrective Action Plan due date
 - Disposition concurrence date
 - Approved corrective action task(s)
 - Task commitment completion date(s)
- 4.11.1 NCR Coordinator, file the original NCR.
- 4.12 Cognizant Engineer/Cognizant Individual, implement the disposition as follows:
- 4.12.1 Develop instructions for correcting/resolving the nonconforming condition.
- 4.12.2 Forward the NCR copy to the responsible organization for action.
- 4.13 Responsible Organization, implement the disposition as follows:
- 4.13.1 Initiate an Action Request, Shipping Authorization, change notice to Purchase Requisition, and/or revise an existing Work Package to implement NCR disposition, and obtain required QA approvals.
- 4.13.2 Include a copy of the NCR in the Work Package or as an attachment to the Shipping Authorization.
- 4.13.3 Forward evidence of disposition corrective action completion to Cognizant Engineer/Cognizant Individual.
- 4.13.4 Cognizant Engineer/Cognizant Individual, review evidence of disposition corrective action completion.
- 4.14 Cognizant Engineer/Cognizant Individual, when Supplier submits AR/VR, review and process in accordance with WP 15-PC3041.
- 4.15 Cognizant Engineer/Cognizant Individual, when disposition corrective actions are completed, assemble evidence of completion and attach to NCR. Return unacceptable disposition corrective actions to the responsible organization for further action.
- 4.15.1 Complete Section F of the NCR.
- 4.15.2 Print name, sign, and date the NCR.
- 4.15.3 Forward the NCR and evidence of completion to Quality Engineer/NCR Coordinator.

5.0 CLOSURE

- 5.1 Quality Engineer/NCR Coordinator, as delegated, perform the following:
 - 5.1.1 Verify completion of the actions identified in Section C of the NCR and the evidence submitted by the Cognizant Engineer.
 - 5.1.2 If concurring with completed actions, complete Section G of the NCR.
 - 5.1.3 If the NCR is for an S/CI, ensure WP 13-QA.05 Attachment 2, Suspect/Counterfeit Items Program QA Checklist, is completed and filed as part of the closure packet and include any additional documentation associated with S/CI.
 - 5.1.4 Verify hold tag(s) have been removed in accordance with Section 8.0 and quantity removed is entered in Section G.
 - 5.1.5 Print name, sign, and date the NCR.
 - 5.1.6 Quality Engineer/NCR Coordinator, verify that CTS commitments are updated in the site tracking system to indicate corrective actions are closed.
 - 5.1.7 Quality Engineer/NCR Coordinator, review for completeness, and file completed NCR documentation.
- 5.2 Quality Engineer/NCR Coordinator, as delegated, if not concurring with completed actions, return the NCR to the Cognizant Engineer for further corrective action or documentation of implemented corrective action(s).

6.0 REVISION

NOTE

NCR revisions are required when information in Section A or Section C has changed. NCR revisions may be used when other conditions make a revision necessary. Line out, initial, and date are used ONLY for minor editorial changes that do not change the original intent of the nonconformance identified or dispositioned. Any attachments are considered specific to the applicable section and revision.

- 6.1 NCR Initiator/Cognizant Engineer/Cognizant Individual, as appropriate, prepare an NCR revision using changed information as follows:
 - 6.1.1 Use the NCR, EA13QA3004-1-0, as needed.

- 6.1.2 Use the same NCR number when revisions (i.e., Rev. 1, Rev. 2, etc.) are used.
- [A] Document reason for revision in Section F.
- [B] Sign and date Section F of the previous revision.
- 6.1.3 Forward NCR revision to Quality Engineer/NCR Coordinator.
- 6.2 Quality Engineer/NCR Coordinator, add remarks to Section G of the previous revision that "disposition and closure transferred to Rev. 1, Rev. 2, etc."
- 6.3 Quality Engineer/NCR Coordinator, verify update to the site tracking system for the revised disposition action, as needed.

NOTE

If a task commitment date cannot be met, the Cognizant Engineer or responsible Individual must submit an e-mail or internal memo to request an extension request prior to the previously scheduled CTS due date.

- 6.4 Cognizant Engineer/Cognizant Individual, prepare a change in task schedule as follows:
- | 6.4.1 Submit written internal memo or e-mail task schedule changes and justification to Quality Engineer/NCR Coordinator.
- | 6.4.2 Include any correspondence that supports requested changes to the disposition action task schedule.
- 6.5 Quality Engineer/NCR Coordinator, verify updates to the site tracking system for the revised schedule.
- 6.6 Quality Engineer/NCR Coordinator, forward original NCR revision correspondence to the NCR Coordinator.
- 6.7 Quality Engineer/NCR Coordinator, file original NCR revision correspondence in the NCR record file.
- 7.0 RECORD REPLACEMENT
- 7.1 Quality Engineer/NCR Coordinator, if the NCR record file is missing an original form, make a diligent search for the missing form with all who might have possessed it.
- 7.2 Quality Engineer/NCR Coordinator, if the missing form is not found after inquiry, mark the best available copy of the form "Best Available Copy," and include with the NCR record file.

8.0 HOLD TAGS ^{3, 4, 5, 6}

NOTE

Quality Engineers and/or inspectors shall issue, conditionally release, and clear hold tags. QA management may delegate administrative activities (e.g., entering data on hold tags) to other QA department personnel.

Hold tags that are associated with an NCR, shall be blue **NCR HOLD TAGS** and shall be identified using the NCR number supplied by the NCR Coordinator.

Hold tags that are not associated with an NCR shall be blue and white **QA HOLD TAGS** and shall be identified using the next sequential number on Attachment 3.

8.1 Issuing Hold Tags

8.1.1 Enter the following on the hold tag, or "N/A" as applicable:

- Tag number
- Identification/description of the item being tagged
- Reason for hold
- Special instructions/conditional release information
- Reference document numbers (identify the related adverse condition documentation [e.g., WIPP Form, and any other related documentation, if applicable, such as a Work Order, Purchase Order, etc.])
- Quantity of hold tags issued
- Name and/or initials and extension of the Quality Engineer/inspector issuing the hold tag

8.1.2 Place the hold tag.

- [A] If practical, attach the completed hold tag to a visible location on the item.
- [B] If directly tagging the item is not practical, place the tag on, or otherwise clearly identify, the item's container, package, or hold area.
- [C] If an installed item cannot be directly tagged, place the completed hold tag in an appropriate location, such as the doorway to an equipment room, remote switch, etc.

- 8.1.3 If a segregated hold area is available:
- [A] Place the tagged item in the segregated hold area.
 - [B] Ensure the segregated hold area is designated, clearly identified, and access is controlled.
- 8.1.4 If it is not practical to place the tagged item in a segregated hold area, establish appropriate administrative controls as necessary to preclude use. (Using yellow caution tape is acceptable.)
- 8.1.5 If associated with an NCR, enter NCR number and each hold tag issued, location(s), name, date, and sign issued by on Attachment 2.
- 8.1.6 If not associated with an NCR, enter location(s), name, date, and sign issued by on Attachment 3.
- 8.1.7 When the item (e.g., hardware/equipment) has been tagged with a QA or NCR Hold Tag, perform the following:
- [A] Issue NCR or QA Hold Tag notification via e-mail to applicable organizations indicating which item is in "Hold" status.
 - [B] Check "Notifications" block on applicable Hold Tag Log.

8.2 Conditional Release

NOTE

Quality Engineering representative(s) shall process NCR "conditional releases" according to the provisions outlined in Attachment 4 and the following steps.

- 8.2.1 Evaluate request for conditional release. Discuss with QA management.
- 8.2.2 Attach supporting documentation provided by the Cognizant Engineer and include any additional terms and/or conditions for conditional release to the NCR.
- ## 8.3 Clearing Hold Tags
- 8.3.1 Quality Engineer and Cognizant Engineer/Cognizant Individual, coordinate removal of NCR hold tag(s) during the disposition verification.

- 8.3.2 Remove the affected NCR hold tag(s) and document quantity in Section G of the applicable NCR.
 - 8.3.3 When all applicable documentation has been received, reviewed and approved, and/or CBFO has authorized removal, remove affected QA hold tag(s).
 - 8.3.4 Enter initial and date of removal for applicable hold tag(s) on applicable attachment.
 - 8.3.5 Quality Engineer/NCR Coordinator, destroy and discard the hold tag(s).
- 8.4 Monthly Hold Tag Verification

NOTE

Hold tag verification **SHALL** be performed on a monthly basis, preferably on the last working day of the month, but no later than 15 working days thereafter.

- 8.4.1 Contact the CTS Coordinator for a CTS list of open NCRs at the end of each month. Use this list to determine open NCR hold tag status.
- 8.4.2 Locate applicable NCR number and associated NCR hold tag(s) to be verified on Attachment 2 and verify all information agrees with the CTS list.
- 8.4.3 Locate applicable QA hold tag number and associated QA hold tag(s) to be verified on Attachment 3.

NOTE

When it is not practical to physically verify tag(s) due to access or manpower constraints (e.g., off-site or underground), the Quality Engineer or inspector may request another individual to provide the information needed to verify the applicable attachment entries. The method of verification (if not direct observation) should be noted in the Comments section of the applicable attachment.

- 8.4.4 Verify hold tag(s) are in place per applicable attachment.
 - 8.4.5 Initial and date in the next available block on the applicable attachment for each hold tag verified.
 - 8.4.6 If hold tag(s) are still in place after 6 months, contact the cognizant individual to determine status of disposition.
- [A] If status of disposition is open, verify that the tag is legible and intact. If tag is found to be illegible or damaged,

re-issue new hold tag(s) in accordance with Subsection 8.1. Note on applicable attachment that new hold tag(s) have been issued.

- [B] If status of disposition is complete, clear hold tag(s) in accordance with Subsection 8.3.

8.5 Lost Hold Tag(s)

8.5.1 If a hold tag cannot be located, conduct a search to determine the status of the hold tag (i.e., check to see if the NCR has been cleared and the hold tag(s) have been removed, or documentation has been reviewed and approved, and/or CBFO authorization has been received etc.).

8.5.2 If unable to determine why the hold tag is missing, perform the following:

- [A] Generate a new hold tag with information from the applicable NCR, or if not associated with an NCR, use information on Attachment 3.
- [B] Number the new hold tag using the same number identified with a new sequence number (e.g., FY2006-40 is lost, replace with FY2006-40-1).
- [C] Identify on applicable NCR and hold tag log that original hold tag was lost.
- [D] Place the hold tag in accordance with Subsection 8.1.

Attachment 1 - Sample Hold Tags

NCR HOLD

Item _____
Reason for Hold _____
Special Instructions _____
Conditional Release _____
Ref. Doc. _____

Engineer/Inspector _____ Ext _____

NCR HOLD

WP 13-QA3004-1

The NCR hold tag is WIPP form WP 13-QA3004-1, blue and measures approximately 3 x 5 inches.

Attachment 1 - Sample Hold Tags

The image shows two sample QA Hold tags. The top tag is a detailed form with the following fields:

- QA TAG# |
- Item _____
- Reason for Hold _____
- Special Instructions/ _____
- Ref. Doc. _____
- Engineer/Inspector _____ Ext _____

The bottom tag is a simple form with the following text:

- QA HOLD
- WP 13-QA3004-2

The QA hold tag is WIPP form WP 13-QA3004-2, blue and white, and measures approximately 3 x 5 inches.

Attachment 2 - NCR Hold Tag Log and Verification Sheet

NCR HOLD TAG LOG AND VERIFICATION SHEET

NCR #	Hold Tag # & Location(s)	Issued by (initial/date)	Conditional Release (initial/date)	Off-Site Shipment (initial/date)	Return of Off-Site Shipment (initial/date)	Removal (initial/date)	Monthly Verification						Remarks/ Comments
	Notifications: <input type="checkbox"/>												
	Notifications: <input type="checkbox"/>												
	Notifications: <input type="checkbox"/>												
	Notifications: <input type="checkbox"/>												
	Notifications: <input type="checkbox"/>												

Working Copy

Attachment 3 - QA Hold Tag Log and Verification Sheet

QA HOLD TAG LOG AND VERIFICATION SHEET

Hold Tag #	Location(s)	Issued by (initial/date)	Removal (initial/date)	Monthly Verification					Remarks/ Comments
	Notifications: <input type="checkbox"/>								
	Notifications: <input type="checkbox"/>								
	Notifications: <input type="checkbox"/>								
	Notifications: <input type="checkbox"/>								
	Notifications: <input type="checkbox"/>								

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Attachment 4 - Conditional Release - NCR Hold Tags

NOTE

The following applies to NCR Hold Tags that require a conditional release for **Off-Site** shipment

Quality Engineering representative(s) shall conduct the following NCR "Conditional Release" activities prior to **Off-Site** shipment:

- Obtain the NCR conditional release from the Cognizant Individual/Engineer, including any terms and/or conditions for release.
- Obtain QA Management concurrence for the conditional release through the completion of Section E (Mgr's name, signature and date).
- Issue e-mail "conditional release" notification to applicable organizations, indicating the item is available for **Off-Site** shipment.
- Complete conditional release for applicable NCR on Attachment 2, initial and date.
- Ensure NCR Hold Tag is physically attached to the equipment or item.

Type "B" Packaging

- Provide copy of NCR with the conditional release to Transportation Engineering/Scheduler for Type "B" Packaging.
- Ensure NCR Hold Tag is physically attached to the Type "B" packaging.

NOTE

The following applies to NCR Hold Tags associated with equipment or items (including Type "B" Packaging) **returning** to the WIPP Site:

Quality Engineering representative shall conduct the following upon notification of the NCR "conditionally released" item *returning* to the Site:

- Verify that NCR Hold Tag is physically attached to the equipment, item or Type "B" packaging.
- **IF** NCR Hold Tag is missing, **THEN** generate a duplicate tag and attach to the equipment, item or Type "B" packaging.
- Complete applicable NCR Hold Tag entries on Attachment 2.
- Issue e-mail "return" notification to applicable organizations.

Attachment 4 - Conditional Release - NCR Hold Tags

NOTE

The following applies to NCR Hold Tags associated with items that ***remain On-Site***.

Quality Engineering representative(s) shall perform the following for NCR "conditional release" of items that are to remain **On-Site**:

- Obtain the NCR conditional release from the Cognizant Individual/Engineer, including any terms and/or conditions for release.
- Complete applicable "conditional release" entries on NCR Hold Tag, initial and date.
- Ensure NCR Hold Tag is physically attached to the equipment, item or Type "B" Packaging.
- Complete applicable NCR Hold Tag entries on Attachment 2.
- Issue e-mail "conditional release" notification to applicable organizations.