

NUCLEAR WASTE MANAGEMENT PROGRAM

CONTROLLED COPY NO. 0089

No.: 033-YMP-R 15

Revision: 0

Date: December 15, 1988

Page: 1 of 4

Subject: CONTROL OF NONCONFORMING ITEMS

Approved: FEB 10 1989

Approved by: [Signature] 12/19/88 Date
Yucca Mountain Project Leader

Approved by: [Signature] 12/15/88 Date
Quality Assurance Manager

1.0 GENERAL REQUIREMENTS

Measures are established to control items that do not conform to requirements to prevent their inadvertent installation or use. These measures include documented procedures for identification, documentation, evaluation, segregation (when practical), disposition, and notification to affected organizations. All personnel involved in LLNL-YMP activities are responsible for reporting nonconformances in accordance with established nonconformance control procedures. These procedures are consistent with the minimum requirements listed below.

1.1 IDENTIFICATION

1.1.1 METHOD OF IDENTIFICATION

Identification of nonconforming items are made by marking, tagging, or other methods that do not adversely affect the end use of the item. The identification is legible, easily recognizable, and contains the nonconformance report number. The nonconformance report number is a sequential number preceded by the organizational acronym (e.g., LLNL-1, etc). If tags are used, they are securely attached to avoid loss during handling.

1.1.2 EXCEPTIONS

If identification of each nonconforming item is not practical, the container, package, or segregated storage area, as appropriate, is identified.

1.1.3 CONDITIONAL RELEASE

Work on the nonconforming item is stopped until completion of the action specified in the Nonconformance Report (NCR) disposition. If only a specific portion of the item is in nonconformance, then that specific area is identified and work may proceed on the remaining areas.

9210260156 921013
PDR WASTE
WM-11 PDR

No.: 033-YMP-R 15	Revision: 0	Date: December 15, 1988	Page: 2 of 4
----------------------	----------------	----------------------------	-----------------

work on a nonconforming item must be continued (conditional release) prior to implementation of the disposition, the approval of the DOE Project Office is obtained before such continuance. Requests for conditional releases on nonconforming items include documented justification that the following conditions are met:

- o The nonconforming item can be removed or corrected at a later date without damage to, or contamination of the associated permanent facility equipment or structure.
- o The nonconforming item remains accessible for inspection.
- o The nonconforming item is evaluated and limitation(s) for use of the equipment or system is established.
- o Traceability and identification of the nonconforming item are maintained.

1.2 LOGGING

1.2.1 NONCONFORMANCE CONTROL LOG

The LLNL-YMP maintains a nonconformance control log to track nonconforming items. This log contains the following information:

- o The nonconformance report number.
- o A brief description of the nonconforming condition.
- o Identification of the person or organization responsible for determining and carrying out the nonconformance disposition.
- o The status of each nonconformance report (open or closed).

1.3 SEGREGATION

1.3.1 HOLD AREA

When practical, nonconforming items are segregated by placing them in a clearly identified and designated hold area until they are dispositioned properly.

1.3.2 ALTERNATIVE

When segregation is impractical or impossible because of physical conditions, such as size, weight, or access limitations, other precautions are employed to preclude inadvertent use of a nonconforming item.

1.4 DISPOSITION

1.4.1 NONCONFORMANCE CHARACTERISTICS

nonconforming characteristics are reviewed and recommended dispositions of nonconforming items are proposed and approved in accordance with documented procedures. Further processing, delivery, installation, or use of a nonconforming item is controlled pending an evaluation and an approved disposition by authorized personnel. Distribution of nonconformance documentation is made to all affected organizations.

1.4.2 RESPONSIBILITY AND AUTHORITY

The responsibility and authority for the evaluation, disposition, and close-out of nonconforming items is defined and documented. Those personnel assigned signature approval of the disposition are identified. Quality Assurance (QA) responsibilities relating to nonconformances are described.

1.4.3 PERSONNEL

Personnel performing evaluations to determine a disposition have demonstrated competence in the specific area they are evaluating, an adequate understanding of the requirements, and access to pertinent background information.

1.4.4 DISPOSITIONING OF NCR

The person or organization assigned the responsibility of dispositioning the NCR assures the following:

- o Nonconformance documentation adequately identifies and describes the nonconformance.
- o Appropriate justification for the disposition is documented. In the case of use-as-is or repair dispositions, technical justification is required. The as-built records, if such records are required, reflect the accepted deviation.
- o The disposition references any approved design documents, procedures, plans, work orders, etc., used for the correction of the nonconforming condition.
- o The technical details for correction of the nonconforming condition are adequate for the recommended disposition.
- o If continuance is requested, justification for the activity to continue is documented and approved by the appropriate DOE Project Office Branch Chief and the DOE Project Office Quality Assurance Manager.
- o The disposition complies with existing design documents, test plans or procedures, reports, and regulatory requirements.
- o If a change to reflect the as-built condition is appropriate, then the disposition addresses action to change the existing design documents, test plans or procedures, reports, etc. Any documents changed are cross-referenced on the NCR.
- o Disposition identifies and documents the correction as repair, rework, use-as-is, or reject/scrap.
- o Disposition identifies the people or organization responsible to implement the disposition.

No.:	Revision:	Date:	Page:
033-YMP-R 15	0	December 15, 1988	4 of 4

1.4.5 DOE PROJECT OFFICE APPROVAL

In those cases where the proposed disposition is "repair", the DOE Project Office approves the proposed disposition prior to implementation. In the case of a proposed disposition of "use-as-is", the NCR is forwarded to the DOE Project Office for approval after all actions necessary to support the technical justification of the disposition is completed. The appropriate DOE Project Office Branch Chief and the DOE Project Office Quality Assurance Manager approve NCR dispositions involving "repair" or "use-as-is" determinations and conditional release recommendations.

1.4.6 CORRECTIVE ACTION

The action taken to correct the nonconforming item is verified and documented. Repaired or reworked items are reexamined in accordance with applicable procedures and with the original acceptance criteria, unless the nonconforming item disposition establishes alternate acceptance criteria.

1.4.7 INTERFACES

Internal interfaces between LLNL-YMP units and external interfaces between LLNL-YMP and other High-level Nuclear Waste Program participating organizations are clearly described.

2.0 REPETITIVE NONCONFORMANCES

When repetitive or recurring nonconforming conditions are identified, an evaluation is made as to whether or not further programmatic corrective action is warranted to preclude repetition. This corrective action is beyond the scope of the action taken for the disposition on the existing NCRs and is processed in accordance with corrective action procedures prescribed by the LLNL-YMP.

like R 16?

3.0 TRENDING

Nonconformance reports are periodically analyzed by the QA organization to show quality trends and to help identify root causes of nonconformances. Results are reported to upper management for review and assessment.

4.0 DISTRIBUTION OF DOCUMENTS

Copies of nonconformance reports for items are sent to the DOE Project Office Quality Assurance Manager upon issuance and upon closure. The original nonconformance reports are sent to the DOE Project Office for approval as required by Paragraph 1.4.5.