U. S. DEPARTMENT OF ENERGY

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

OFFICE OF QUALITY ASSURANCE

SURVEILLANCE NUMBER HQ-SR-92-08

IMPLEMENTATION OF QAAP 2.2

VERIFICATION OF PERSONNEL QUALIFICATIONS

JULY 13-23, 1992

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT

WASHINGTON, D.C.

Prepared by: Rod Schaffer 10/30/92

Rod Schaffer
Surveillance Team Leader
Headquarters Quality Assurance Division

Approved by: R.W. Cole 11/23/92

For Donald G. Horton
Director
Office of Quality Assurance

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PDR WASTE
WM-11 PDR

1.0 EXECUTIVE SUMMARY

The surveillance was conducted to verify that the Office of Civilian Radioactive Waste Management (OCRWM) was in compliance with the program requirements for verifying the qualifications of personnel who are performing work subject to the QARD. The surveillance was conducted at the OCRWM and WESTON offices in Washington, D.C. and at the CER offices in Arlington, Virginia from July 13-23, 1992. The surveillance was performed by personnel from the Headquarters Quality Assurance Division (HQAD) of the Office of Quality Assurance. Except for three deficiencies identified during the surveillance, the team found that OCRWM had adequately implemented the QA program with regard to verifying the qualifications of personnel engaged in work subject to the QARD. Three Corrective Action Requests (CARs) were issued, all dealing with incomplete personnel qualification records. Information copies of the CARs are enclosed as Attachment 1.

2.0 SCOPE

Surveillance Number HQ-SR-92-08 was conducted to verify that personnel from the OCRWM and direct support contractor personnel were complying with the applicable program requirements for the verification of personnel qualifications. The surveillance was conducted in accordance with the requirements of Quality Assurance Administrative Procedure (QAAP) 18.3, Revision 3.

The surveillance team verified implementation of the requirements from Revisions 0 and 1 of QAAP 2.2, "Verification of Personnel Qualifications", OCRWM Quality Assurance Requirements Document (QARD), Revision 4 (ICN 4.1), and the additional guidance and clarifications contained in the memorandum from OQA dated January 13, 1992 regarding the implementation of DOE SYSTEM 80.

3.0 SURVEILLANCE TEAM

The surveillance team consisted of the following personnel:

Rod Schaffer, Surveillance Team Leader, WESTON
Pete Chomentowski, Surveillance Team Member, WESTON

4.0 PERSONNEL CONTACTED DURING THE SURVEILLANCE

The following OCRWM and direct support contractor personnel were contacted during the course of the surveillance:

W. E. Wowak, WESTON, APM, Storage, Transportation and Disposal
R. E. Gamble, WESTON, Manager, Geologic Analysis and Verification

D. Hodges, WESTON, Document Control Specialist
J. Saliunas, WESTON, Manager, Cost and Schedule Analysis
P. A. Bolton, WESTON, Manager, Transportation and Logistics
C. Charles, WESTON, Engineer, MRS Department
D. Ellis-Brown, TRW, Document Records Specialist
G. Ruffin, TRW, QRC Manager
C. Good, CER, Quality Assurance Specialist
R. W. Minning, Director, Contract Management Division, RW-53
T. Van, Chief, Configuration Management Branch, RW-323
T. Wood, Director, M&O Management Division, RW-321
M. Senderling, General Engineer, System Engineering, RW-321
J. Arpia, Training Coordinator, Management Services, RW-131
J. Roberts, Acting Associate Director, Office of Systems and Compliance, RW-33
S. J. Brocoum, Director, Analysis and Verification Division, RW-22
W. A. Lemeshewsky, Chief, Systems Engineering Branch, RW-321
C. M. Lukasik, Chief, Management Services Branch, RW-131
J. Roccapriore, Administrative Officer, RW-131
D. Stucker, General Engineer, RW-22
R. Clark, Director, Headquarters Quality Assurance Division, RW-3.1
J. Williams, Branch Chief, RW-421
L. Campbell, WESTON, Division Secretary

5.0 SURVEILLANCE RESULTS

Evaluation:

It was determined that OCRWM had adequately implemented the requirements of the quality assurance program with regard to verifying the qualifications of personnel who are engaged in work subject to the QARD.

Corrective Action Requests:

The three Corrective Action Requests resulting from the surveillance activity are summarized below:

1. CAR-HQ-92-13

   Only one member of the Analysis and Verification Division (Office of Geologic Disposal) has been identified as performing work subject to the QARD. There was no objective evidence that the records of personnel

qualifications for that individual had been completed or forwarded to the Quality Records Center (QRC) for entry into DOE SYSTEM 80 records.

In addition, at least one other member of the Analysis and Verification Division has been performing work subject to the QARD without being designated as such, and without having the appropriate personnel qualification records completed as required by QAAP 2.2.

2. CAR-HQ-92-14

There was no objective evidence that the records of personnel qualifications for an individual contracted to perform work subject to the QARD for the Office of Systems and Compliance had been completed or transmitted to the QRC for entry into DOE SYSTEM 80 records.

3. CAR-HQ-92-15

The surveillance team could not locate the records for two individuals formerly assigned to the staff of the Office of Quality Assurance. Both of these individuals have since left the program.

Surveillance Methodology:

The surveillance team reviewed personnel qualification record files to determine compliance in the following key areas of the governing procedures:

- Verification of experience and education by the individual's supervisor.
- The presence of a position description and, if applicable, the appropriate page from the X-118 manual.
- Verification that education and experience of the individual matched the requirements stated on the position description or X-118 requirement.
- Degree of compliance by affected organizations of records requirements.
- Verification that individual training files contained an I&T matrix established for that position by the supervisor and that the document identified the training completed by the individual.

- Verification that the supervisors were maintaining working files of the personnel reporting to them.

Review of Records for Individuals Designated as Performing Work Subject to the QARD:

The team reviewed the qualification records of those individuals who have been designated as performing work subject to the QARD. The list of designated individuals was obtained from the OCRWM Training Coordinator. The qualification records reviewed are identified in the "Objective Evidence" section of this report. A total of 96 personnel qualification records were reviewed with the following results:

The documentation for Mr. S. Brocoum (Director, Analysis and Verification Division) could not be located by the team. When the surveillance team brought this to the attention of Mr. Brocoum, he indicated that the required verifications had been performed and it should just be a matter of placing them in the QRC. As of the completion of this surveillance, the records have not been placed in the QRC. It was also noted that Mr. Brocoum is the only individual in the Analysis and Verification Division who is designated as performing work subject to the QARD. When one of his staff was questioned about this it was explained that a management decision had been made to not designate staff personnel as performing work subject to the QARD. This resulted in Analysis and Verification Division staff personnel performing work subject to the QARD without having their qualifications documented and verified in accordance with QAAP 2.2. The above conditions have been addressed in CAR-HQ-92-13.

The personnel certifications for Mr. G. Gardner (Office of External Relations) could not be located by the team. In a conversation with Mr. Gardner, he indicated that the sole quality affecting activity of the Office of External Relations is the sign off function as a member of the PCCB. No CAR resulted from this since the review by the Office of External Relations is not likely to involve a review from a quality assurance or technical standpoint. This situation is addressed in the "Recommendations" section of this report.

The review of the files submitted by the Office of Storage and Transportation identified that no qualification records had been submitted for Mr. L. Stewart, who is designated as performing work subject to the QARD. A record package had been opened but no information had been placed in it. This was discussed with personnel from the Office of Storage and Transportation and the appropriate records were subsequently transmitted to the QRC. The file was reviewed by the surveillance team and was found to be satisfactory.

Qualification records submitted by the Office of Quality Assurance, were found to be complete for current staff members, however the surveillance team could not locate the records for two former OQA staff members, Mr. K. Summer and Mr. K. Mutreja. The above condition has been identified in CAR-HQ-92-15.

The review of qualification files for WESTON personnel indicated that records packages for eight individuals were incomplete. The surveillance team was able to verify that steps had been taken to obtain the information from previous employers and schools for all of the individuals, however the inquiries had not yet received a response. In addition, the review of the associated I&T Matrices, to verify compliance to paragraph 6.4.1 of QAAP 2.2, identified that the files of two individuals from the WESTON Technical Support Team contained no evidence that training had been completed. One file contained only an initial I&T and the other file contained no I&T. These conditions were not documented on a CAR because the surveillance team could find no evidence that the individuals involved had performed work subject to the QARD.

Qualification files for several members of the CER staff could not be located in the QRC. When this was brought to the attention of CER personnel, the surveillance team was informed that the files had been completed (or were in the final stages of completion) and were undergoing a final review before transmittal to the QRC. The files were reviewed at the CER offices and no deficiencies were identified. The files were subsequently transmitted to the QRC prior to the completion of the surveillance.

The surveillance team interviewed several supervisory personnel to determine if they were maintaining working copies of personnel files and if the files were being maintained in a locked cabinet as required by procedure. The surveillance team also verified that the files included copies of resumes and SF-171 forms to review as indicated on the Personnel Qualification Forms signed by the supervisors. All of the files reviewed contained sufficient documentation to substantiate the statements. No deficiencies were noted.

The surveillance team discussed the implementation of QAAP 2.2 with the management and staff of the Management Services Branch. The personnel interviewed seemed knowledgeable of the requirements and explained their efforts to assure compliance by OCRWM management. A guidance memo was produced, dated February 5, 1992, which provided additional details to supplement a memorandum issued on January 13, 1992 by OQA. Personnel from the Management Services Branch also presented a standard memo which will be used to advise cognizant supervisors of their responsibilities regarding personnel verifications prior to offering employment to potential employees.

During discussion with the OCRWM Training Coordinator, it was identified that the personnel files for inactive OCRWM employees had all been placed under one file number. The Training Coordinator explained that this was done to get the files into SYSTEM 80 as soon as possible. There had been some confusion by OCRWM personnel as to who was responsible for obtaining the file number from the QRC, so the number was established by the Training Coordinator. When the team asked the Coordinator how the file would eventually be closed out she indicated that she had not considered it. No CAR was issued since no specific requirement of the procedures had been violated, however, a method to transition this file into the standard format needs to be established to allow for traceability, retrievability and closeout (validation) of records related to specific individuals.

Review of Documentation Packages for Work Activities Subject to the QARD:

The surveillance team reviewed several records packages to verify that the personnel qualification records for individuals performing specific work activities had been completed in accordance with the requirements of QAAP 2.2. The document packages reviewed during this segment of the surveillance are identified in the "Objective Evidence" section of this report.

The surveillance team reviewed several packages which identified Mr. Duffy as having been involved in performing work activities subject to the QARD.. The package for Document Change Proposal 46 (Physical System Requirements-Store Waste, Revision 0) contained a Proficiency Report attesting to Mr. Duffy's qualifications based upon a review of his resume, job description, and previous experience and education. The documentation package for the Physical System Requirements - Accept Waste, Revision 0 contains draft responses to the PCCB with a letter stating that responses were prepared under the direction of Mr. Duffy. The review of the documentation package for the Physical System Requirements - Store Waste, Revision 1 identifies Mr. Duffy as the Task Coordinator. The surveillance team was not able to locate a complete set of Mr. Duffy's qualification records as required by QAAP 2.2. Only a copy of his resume was found. The PQS Form and the verifications of the education and experience could not be located. The absence of documentation to certify Mr. Duffy's qualifications was discussed with Mr. Lemeshewsky (Office of Systems and Compliance) who stated that he would obtain the necessary records. The above condition has been identified in CAR-HQ-92-14.

The review of the Physical System Requirements- Transport Waste (DCP-59) contained Technical Document Input Control Forms prepared by Mr. M. Senderling and approved by Mr. W. Lemeshewsky, both from the Office of Systems and Compliance. At the time that this package was being reviewed, the QRC had not yet received the qualification

files for either individual. The files were placed in the QRC before the surveillance ended and a review of their contents identified no deficiencies.

The review of the document package for the Physical System Requirements - Overall System identified another individual from Office of Systems and Compliance (Mr. Gomberg) whose file had not been sent to the QRC. The file was transmitted to the QRC files shortly after personnel from the Office of Systems and Compliance were informed of the condition.

Objective Evidence

The surveillance team examined SYSTEM 80 records and supervisor working files to assess the implementation of QAAP 2.2. The following personnel files were examined:

Name	Org.	Name	Org.	Name	Org
P. Chomentowski	W	B. Cerny	DOE	C. Lukasik	DOE
J. Marchand	W	J. Roccapriore	DOE	A. Gillen	DOE
V. Montenyohl	W	J. Arpia	DOE	C. Gertz	DOE
R. Schaffer	W	B. Jarrett	DOE	A. Hunt	DOE
R. Howard	W	D. Johnson	DOE	T. Wood	DOE
W. Booth	W	C. Russomanno	DOE	J. Leahy	DOE
R. Gamble	W	F. Bearham	CER	R. Brown	CER
H. Cleary	W	J. Christy	CER	M. Donovan	CER
J. Docka	W	N. Frank	CER	J. George	CER
D. Dresser	W	P. Richerson	CER	T. Rodgers	CER
R. Mele	W	P. White	CER	J. Lewis	DOE
D. Rasmussen	W	C. Quan	DOE	S. Peterson	DOE
P. Bolton	W	D. Shelor	DOE	W. Lemeshewsky	DOE
R. Hahn	W	T. Nguyen	DOE	T. Truong	DOE
M. Rahimi	W	M. Senderling	DOE	M. Popa	DOE
L. Boesch	W	S. Gomberg	DOE	H. Cadoff	DOE
R. Goffi	W	J. Roberts	DOE	T. Van	DOE
L. Killpack	W	R. Milner	DOE	V. Trebules	DOE
H. Minwalla	W	J. Williams	DOE	L. Stewart	DOE
R. Palabrica	W	D. Kane	DOE	P. Kumar	DOE
A. Prindiville	W	N. Del Gobbo	DOE	J. Jones	DOE
H. Victor	W	J. Carlson	DOE	W. Lake	DOE
J. Richardson	W	M. Conroy	DOE	A. Brownstein	DOE
C. Charles	W	E. Svenson	DOE	M. Payton	DOE
D. Bochardt	W	N. Montgomery	DOE	J. Pirro	DOE
J. Kowal	W	D. Horton	DOE	D. Hendrix	CER
S. Dixit	W	R. Clark	DOE	H. Lentz	CER
W. Wowak	W	R. Murthy	DOE	M. Meyer	CER
P. Friedman	W	T. Isaacs	DOE	C. Morell	CER
J. Saltzman	DOE	G. Gardner	DOE	C. Nye	CER
S. Rousso	DOE	J. Bresee	DOE	P. Narducci	CER
T. Preisser	CER	T. Swift	CER	C. Weber	DOE

The surveillance team examined the following record packages:

QRP-90-0332-00- Physical System Requirements, Store Waste, Revision 0
QRP-91-0652-00- System Specification, MRS CDR
QRP-91-0573-00- MRS Design Requirements
QRP-92-0594-00- WMS Description Document, Revision 0
QRP-92-0603-00- Physical System Requirements, Transport Waste, Revision 0
QRP-92-0641-00- Physical System Requirements, Overall System, Revision 1
QRP-92-0642-00- Physical System Requirements, Store Waste, Revision 1
QRP-92-0643-00- MRS System Requirements Document
QRP-90-0330-00- Physical System Requirements, Accept Waste, Revision 0 (documents not yet placed in QRC)

6.0 RECOMMENDATIONS

The following recommendations do not require a response, however, OCRWM management is expected to address the recommendations and take appropriate action. These areas may be evaluated during subsequent verification activities.

1. It was stated earlier in this report that the qualification documents for Mr. Gardner were not in the QRC. In a discussion with Mr. Gardner, he emphasized that the extent of his involvement with work subject to the QARD consists of participation in the PCCB. The team recommends that the Office of External Relations reassess the necessity to maintain Mr. Gardner's quality designation . If the determination is made to maintain his designation, then it will be necessary to comply with QAAP 2.2 and provide the required documentation to the QRC. The same evaluation should be made about maintaining Mr. Saltzman's designation.

2. During the course of the review activities the team members were asked by QRC personnel if the Proficiency Review Reports required by the superseded QAAP 3.1 are considered a document which should be placed under the controls of SYSTEM 80. The forms are currently included as part of the documentation associated with the respective document package for which the individual was involved.

The surveillance team recommends that a meeting be held between OQA and the Office of Program and Resources Management to determine whether these forms need to be treated as System 80 Records. Based on the results of this meeting, further guidance should be provided to Line Organizations.

3. Personnel contacted during the audit expressed some confusion as to the correct method for documenting the qualifications of personnel who perform work under OCRWM procedures, but who are not OCRWM employees (e.g., M&O or National Laboratory employees who participate in a review of a technical document in accordance with QAAP 6.2). The team recommends that a clarifying statement be added to the next revision of QAP 3.5, QAP 5.1, QAP 6.2, and QAAP 18.1. The statement should indicate that non-OCRWM personnel, who participate in work controlled by OCRWM procedures, need not duplicate personnel qualification files for the QRC if qualifications were verified and documented under their own approved program. A memo certifying that the personnel qualifications have been verified and documented in accordance with the requirements of QAAP 2.2, or equivalent, is permissible.

4. As stated earlier in this report the Training Coordinator had placed the files of inactive OCRWM personnel into the QRC SYSTEM 80 records under one SYSTEM 80 number (SY80-92-0338.00). The team recommends that the files be maintained as currently set up in the QRC. However, when an individual's personnel file is closed out (validated) it should be provided with its own unique file number to assure future retrievability.

5. Several of the files of RW-40 personnel contained a form used to document the inquiries made to previous employers and schools to verify the validity of statements made on the résumé. The information entered on the form was complete with regard to the name of the person contacted and the essence of the phone conversation, however, the forms provided no provisions to identify the requestor and the forms contained no evidence of who had made the inquiry. The team recommends that these forms be signed by the supervisor who made the inquires.

Attachment I

[8] CAR NO. HQ-92-013
DATE: N/A
PAGE: ____ OF ____
QA

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

CORRECTIVE ACTION REQUEST

[1] Controlling Document
QA Administrative Procedure 2.2 Rev. 1

[2] Related Report No.
HQ-SR-92-08

[3] Responsible Organization
RW-20

[4] Discussed With
S. Brocoum

[5] Requirement:

Sections 6.1 and 6.2 of QAAP 2.2 require that supervisors develop a position description, complete a Position Qualification Statement, and verify, to the extent possible, accuracy of the information provided against the minimum education and experience required for the position. This requirement applies to OCRWM and direct-support contractor personnel who perform activities subject to QA program control.

[6] Adverse Condition:

There is no evidence of a position description, a Position Qualification Statement or that a verification of education and experience for Mr. S. Brocoum had been completed. Mr. Brocoum is designated as performing work subject to the QARD.

In addition, Mr. Brocoum is the only member of RW-22 who has been identified as performing work subject to the QARD. At least one other member of RW-22 (D. Stucker) has been performing work subject to the QAR without the appropriate documentation as required by QAAP 2.2.

[9] Does a significant condition adverse to quality exist? Yes___ No X
If Yes, Circle One: A B C

[10] Does a stop work condition exist? Yes___ No X; If Yes - Attach copy of SWO
If Yes, Circle One: A B C D

[11] Response Due Date: 12/7/92

[12] Required Actions: ☒ Remedial ☒ Extent of Deficiency ☐ Preclude Recurrence ☐ Root Cause Determination

[13] Recommended Actions: The supporting documents needed to certify the qualifications of Mr. Brocoum should be obtained and forwarded to the QRC as soon as possible. Other members of RW-22 who perform work subject to the QARD should be identified, and their qualifications should be documented and verified in accordance with QAAP 2.2. If the appropriate documentation can not be obtained, the work performed by these individuals will need to be evaluated for impact.

[7] Initiator: Rod Schaffer — Date 10/30/92	[14] Issuance Approved by: QADD R.W. [illegible] — Date [illegible]
[15] Response Accepted: QAR — Date	[16] Response Accepted: QADD — Date
[17] Amended Response Accepted: QAR — Date	[18] Amended Response Accepted: QADD — Date
[19] Corrective Actions Verified: QAR — Date	[20] Closure Approved by: QADD — Date

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OFFICE OF CIVILIAN
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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

[8] CAR NO. HQ-92-014
DATE: N/A
PAGE: ____ OF ____
QA

CORRECTIVE ACTION REQUEST

[1] Controlling Document
QA Administrative Procedure 2.2 Rev. 1

[2] Related Report No.
HQ-SR-92-08

[3] Responsible Organization
RW-30

[4] Discussed With
W Lemeshewsky

[5] Requirement:

Sections 6.1 and 6.2 of QAAP 2.2 require that supervisors develop a position description, complete a Position Qualification Statement, and verify, to the extent possible, accuracy of the information provided against the minimum education and experience required for the position. This requirement applies to OCRWM and direct-support contractor personnel who perform activities subject to QA program control.

[6] Adverse Condition:

There is no evidence of a position description, a Position Qualification Statement or that a verification of education and experience for Mr. Michael Duffy had been completed. Mr. Duffy is designated as performing work subject to the QARD.

[9] Does a significant condition adverse to quality exist? Yes___ No X
If Yes, Circle One: A B C

[10] Does a stop work condition exist? Yes___ No X; If Yes - Attach copy of SWO
If Yes, Circle One: A B C D

[11] Response Due Date: 12/7/92

[12] Required Actions: ☒ Remedial ☐ Extent of Deficiency ☐ Preclude Recurrence ☐ Root Cause Determination

[13] Recommended Actions:
The supporting documents needed to certify the qualifications of the referenced individual should be obtained and forwarded to the QRC as soon as possible. If the appropriate documentation can not be obtained, the work performed by this individual will need to be evaluated for impact.

[7] Initiator: Ron Schaffer — Date 10/20/92	[14] Issuance Approved by: QADD R.W. Clap — Date 11/9/92
[15] Response Accepted: QAR — Date	[16] Response Accepted: QADD — Date
[17] Amended Response Accepted: QAR — Date	[18] Amended Response Accepted: QADD — Date
[19] Corrective Actions Verified: QAR — Date	[20] Closure Approved by: QADD — Date

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RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

[8] CAR NO. HQ-92-015
DATE: N/A
PAGE: ____ OF ____
QA

CORRECTIVE ACTION REQUEST

[1] Controlling Document
QA Administrative Procedure 2.2 Rev. 1

[2] Related Report No.
HQ-SR-92-08

[3] Responsible Organization
RW-3.1

[4] Discussed With
R.W. Clark

[5] Requirement:

Sections 6.1 and 6.2 of QAAP 2.2 require that supervisors develop a position description, complete a Position Qualification Statement, and verify, to the extent possible, accuracy of the information provided against the minimum education and experience required for the position. This requirement applies to OCRWM and direct-support contractor personnel who perform activities subject to QA program control.

[6] Adverse Condition:

There is no evidence of a position description, a Position Qualification Statement or that a verification of education and experience for Mr. K. Summers and Mr. K. Mutreja had been completed. Mr. Summers and Mr. Mutreja were formerly assigned to the project and were designated as personnel performing work subject to the QARD.

[9] Does a significant condition adverse to quality exist? Yes___ No X
If Yes, Circle One: A B C

[10] Does a stop work condition exist? Yes___ No X; If Yes - Attach copy of SWO
If Yes, Circle One: A B C D

[11] Response Due Date: 12/7/92

[12] Required Actions: ☒ Remedial ☐ Extent of Deficiency ☐ Preclude Recurrence ☐ Root Cause Determination

[13] Recommended Actions:
The supporting documents needed to certify the qualifications of the referenced individuals should be obtained and forwarded to the QRC as soon as possible. If the appropriate documentation can not be obtained, the work performed by these individuals will need to be evaluated for impact.

[7] Initiator: Rod Scheffler Date 10/30/92	[14] Issuance Approved by: QADD R.W. Clark Date 11/9/92
[15] Response Accepted: QAR Date	[16] Response Accepted: QADD Date
[17] Amended Response Accepted: QAR Date	[18] Amended Response Accepted: QADD Date
[19] Corrective Actions Verified: QAR Date	[20] Closure Approved by: QADD Date

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