

HEADQUARTERS QUALITY ASSURANCE DIVISION
OBSERVATION REPORT
MANAGEMENT AND OPERATING CONTRACTOR
QUALITY ASSURANCE PROGRAM INTERNAL AUDIT 92-SRA-02
OF THE M&O SECRETARIAT
CONDUCTED AT VIENNA, VIRGINIA
OCTOBER 5-9, 1992

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1.0 INTRODUCTION

The OCRWM Office of Quality Assurance observed the Management and Operating (M&O) Contractor Internal Audit 92-SRA-02 of the M&O Secretariat. The audit was conducted on October 5-9, 1992 at the M&O Offices in Vienna, Virginia.

The purpose of the audit was to assess the implementation and effectiveness of the M&O Quality Assurance Program in the Secretariat organization as it relates to document control and quality assurance records management.

2.0 OBJECTIVE

This report addresses the evaluation of the adequacy and effectiveness of the audit process in determining the ability of the M&O Secretariat to implement selected QA Program controls for document control and QA records management.

3.0 AUDIT PARTICIPANTS

George P. Vaslos, Audit Team Leader
Hubert Dameron, Auditor-In-Training
Daniel Jennings (Duke Engineering & Services), Technical Expert
Cheryl Good (CER/RW-3), Observer

4.0 REVIEW OF AUDIT PROCESS

The audit process was observed to determine the audit team's ability to adequately assess implementation and effectiveness of the M&O's QA program for M&O Secretariat activities. The primary activities of the M&O Secretariat that are subject to the M&O QA Program are records management and document control. To investigate M&O Secretariat activities the audit team used a formal checklist. The majority of checklist items were based on the series of Quality Assurance Procedures (QAPs) which govern QA records management activities. The checklist also included items covering organization, quality assurance program, and corrective action.

The audit was effectively performed, as determined by direct observations during interviews; discussions with the auditors and those being audited; and reviews of the audit plan, checklists, and examined documents. The audit team leader was organized, well-prepared, and professional in the manner in which he directed the audit. The auditors were thorough in conducting interviews and examining objective evidence to complete the checklist items. The use of a records management technical specialist on the audit team was advantageous because of the focus on Criterion 17.

The audit team identified two Corrective Action Reports (CARs) during the audit; both of which were issued to the training organization. Six areas of concern and two recommendations, which require no written response, were identified in document control and records management activities. In addition, four potential CARs plus three areas of concern were identified and corrected during the audit. The audit team concluded, and the observer agreed, that the program is effective and adequately implemented in the areas audited.

5.0 OBSERVER COMMENTS

- 5.1 The records management staff was responsive in taking immediate action to correct or address audit team concerns.
- 5.2 The M&O has chosen to impose QA program controls on all OCRWM program records management activities, both QA and non-QA. Thus, the QAPs governing these activities prescribe procedural controls that are beyond the QARD requirements specific for QA records. Imposing consistent controls on all program records is certainly prudent, particularly given open issues relating to licensing records, which encompass more than QA records. However, the current QAPs could be considered to be overly detailed in defining non-QA administrative controls, thereby subjecting these activities to errors that are not strictly conditions adverse to QARD requirements.
- 5.3 Secretariat management expressed a concern during the audit exit meeting that QA records are not being submitted to the LRC in a timely manner. In response to this comment, the audit team recommended that the identification, preparation, submittal, and closure of associated QA records be included as checklist items on all future M&O Quality Assurance audits and surveillances of technical activities.