

OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM)

OFFICE OF QUALITY ASSURANCE (OQA)

AUDIT PLAN FOR AUDIT HQ-95-01

OF THE

CRWMS M&O (TRW)

VIENNA, VIRGINIA

OCTOBER 10-14, 1994

Prepared by:

Dennis Threatt

Date:

9/15/94

Dennis Threatt
Audit Team Leader
Headquarters Quality Assurance Division,
Quality Assurance Technical Support Services

Approved by:

R. W. Horton

Date:

9/16/94

For Donald G. Horton
Director
Office of Quality Assurance

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PDR WASTE
WM-11 PDR

1.0 SCOPE:

The scope of the audit will include the evaluation of processes and activities of the CRWMS M&O for purpose of controlling subcontract work. The focus of the audit will be a performance-based evaluation of the processes and products to determine the effectiveness of the M&O quality assurance (QA) program with regard to the performance of the subcontract work. In addition, the clarity of task descriptions provided to the CRWMS M&O will be evaluated.

Follow up of any open Corrective Action Requests (CARs) and a sample of discrepancies identified during previous QA audits and surveillances may be included in the scope of this audit to determine the effectiveness of M&O corrective actions.

2.0 AUDIT SCHEDULE

Pre-audit Team/Observer Meeting 8:00 a.m., October 10, 1994
Vienna, VA

Pre-audit Conference 8:30 a.m., October 10, 1994
Vienna, VA

Audit Activities 9:30 a.m. to 4:00 p.m.
October 10, 1994
Vienna, VA

8:00 a.m. to 4:00 p.m.
October 11 through 13, 1994

8:00 a.m. to 11:30 a.m.
October 14, 1994

Post-audit Conference 2:00 p.m., October 14, 1994
Vienna, VA

There will be a daily Audit Team/Observer Meeting at 4:00 p.m. and also a daily Management Briefing starting at 8:30 a.m. to discuss potential deficiencies and establish any needed liaison.

3.0 REQUIREMENTS TO BE AUDITED AND APPLICABLE REFERENCES

The requirements to be audited will be contained in process and technical checklists. These checklists will be developed based on the critical steps of the subcontract work control process as identified by the OCRWM OQA audit team and M&O representatives.

4.0 ACTIVITIES TO BE AUDITED

M&O processes and products associated with the control of subcontract work will be audited. The processes and products are the result of a joint OCRWM and M&O evaluation of M&O activities to identify critical steps in the control of subcontract work. The following is a list of the identified critical steps:

- 1 Work Definition
- 2 Work Classification
- 3 Procurement Planning
- 4 Procurement Document Preparation
- 5 Supplier Evaluation & Selection / P.O. Award
- 6 Post Award Activities
- 7 Evaluation & Acceptance
- 8 Adequate Control Process

5.0 AUDIT TEAM MEMBERS:

The audit team will consist of:

Dennis Threatt	QATSS, Washington, D. C.	Audit Team Leader
Fred Bearham	QATSS, Washington, D. C.	Auditor
Walter Coutier	QATSS, Washington, D. C.	Auditor
Hugh Lentz	QATSS, Washington, D. C.	Auditor
Tom Swift	QATSS, Washington, D. C.	Auditor
Gary Wood	QATSS, Washington, D. C.	Auditor

Observers from the State of Nevada, the NRC, and other interested parties will be invited to participate.

6.0 ORGANIZATIONS TO BE NOTIFIED:

CRWMS M&O

7.0 AUDIT CHECKLISTS:

The following audit checklists will be used in the performance of this audit.

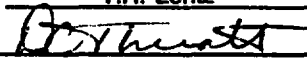
HQ-95-01 Performance based checklist: Checklist based on critical steps in the overall process involving control of subcontract work

HQ-95-01 Technical checklist: Checklist based on technical requirements.

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QUALITY ASSURANCE CHECKLIST

1 ORGANIZATION EVALUATED M&O	2 [x] EXTERNAL [] INTERNAL	3 [x] AUDIT [] SURVEILLANCE	4 PREPARED BY <u>F.H. Lentz</u>  DATE <u>9/27/94</u>	
5 CONTROLLING DOCUMENT (Title, Number, Revision) Quality Assurance Requirements and Description (QARD) DOE/RW-0333P, Rev. 1			7 ACTIVITY EVALUATED Work Definition	
8 ITEM NO.	9 CHARACTERISTICS TO BE EVALUATED		10 REMARKS	11 RESULTS
1	Evaluate work scope of subcontractors versus DOE Contract, DOE WADs, and DOE Technical Directives. (Determine which WBS activities are involved.)			
2	Evaluate the DOE process for determining the need for work activity.			

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QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
3	Evaluate DOE process for developing the Contract, WAD, TD scopes of work <ul style="list-style-type: none">• Personnel qualification/training• Procedures• QA/Technical requirements		
4	Evaluate DOE review of M&O procurement and task directives. <ul style="list-style-type: none">• Criteria• Personnel qualification/training• Procedures		

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
5	Evaluate M&O process of reviewing DOE task directives (Contract, WADs, TDs.) (Determine extent of technical and QA input.) <ul style="list-style-type: none">• Criteria• Personnel qualification/training• Procedures		
6	Determine process for M&O review feedback to DOE. <ul style="list-style-type: none">• Responsibilities• Decision making• Control of changes• Communication• Documentation		

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7	Evaluate M&O process for determining need for subcontract <ul style="list-style-type: none">• Criteria• Documentation		
8	Evaluate M&O process for developing/defining Subcontractor Scope of Work. <ul style="list-style-type: none">• Procedures• Personnel qualification/training• QA/Technical requirements• DOE interface• Responsibilities• Partial/shared scopes of work		

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
9	Evaluate DOE overview process for work scope assigned to the M&O. <ul style="list-style-type: none">• Personnel qualification• Documentation• Procedures• Responsibilities• QA/Technical Requirements		
10	Determine M&O understanding of task assignment based on subcontractor work scope analysis (QAP-2.0) and M&O procurement planning.		

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5 CONTROLLING DOCUMENT (Title, Number, Revision) Quality Assurance Requirements and Description (QARD) DOE/RW 0333P, Rev. 1			7 ACTIVITY EVALUATED Work Classification	
8 ITEM NO.	9 CHARACTERISTICS TO BE EVALUATED		10 REMARKS	11 RESULTS
1	Obtain from Work Definition Audit Group a list of items and activities assigned to the M&O by DOE/OCRWM. Verify Revisions of Controlling Document for Work Classification a. QAP-2-0/Rev. 1, <i>Work Control</i> b. QAP-2-3/Rev. 6, P0, <i>Classification of Permanent Items</i> c. Others procedures (VLP, NLP, CLP)			
2	Verify responsible personnel are consistently trained for Work Classification, and in IAW procedures and CFRs.			

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
3	Review list to verify a sample of items are properly listed in: a. Q-Lists b. Management Control (MC) List c. In Review Process		
4	Select sample that should be evaluated per: a. 10CFR71/Attachment III b. 10CFR72/Attachment II		

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
5	Review selected classification checklists a. Completed technical criteria identified in procedure. b. Cognizant designer provided design information. (QAP-2-3/para. 5.1.3b) c. Review Classification Analysis using format and content. (QAP-2-3, Para. 5.1.3c) d. Design inputs identified and controls e. To be verified items identified		
6	Verify analyst ensures analysis is effectively: a. Checked b. Approved c. Processed d. IAW Procedures (QAPs-2-3, 3-9)		

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
7	Verify proper resolution of verification comments.		
8	Verify the appropriate office manager forwards a copy of the completed analysis as appropriate to: a. YMPO (MGDS) b. RW-40 (storage and transportation)		

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
9	Evaluate if any changes are required as a result of preparation and verification of design output documents (drawings and specifications) (Example MPC DPS)		
10	Review previous audit findings, (QAP-2-0, 2-3) corrective action, lessons learned for M&O and OQA and review appropriate actions such as changes in procedures, and/or training.		

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5 CONTROLLING DOCUMENT (Title, Number, Revision) Quality Assurance Description (QARD) DOE/RW/0333P, Rev. 1			7 ACTIVITY EVALUATED Procurement Planning	
8 ITEM NO.	9 CHARACTERISTICS TO BE EVALUATED		10 REMARKS	11 RESULTS
1	Determine which revision of QAP-7-1 was in effect during the Procurement Planning phase of each subject procurement. (General)			
2	Review the procurement plan for each procurement for: consistency, adequacy, clarity, completeness, proper review and authorization. Does the plan include a clearly stated objective? Do all responsible staff have review and approval responsibilities? Does the plan address all procurement activities from conception to acceptance of the product? Does the plan include end user considerations.			

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
3	<p>Evaluate the adequacy of interface activities between the following responsible staff to ensure that all responsible staff are fully aware of progress and informed of changes.</p> <ul style="list-style-type: none"> a. Task Managers b. Subcontracts and Purchasing Manager c. Q Manager d. M&O Contracting Officer's Technical Representative (COTR) e. Source Evaluation Board (SEB) f. Source Selection Official (SSO) g. Plan Preparer h. Procurement Document Preparer i. Subcontract Specialist/Buyer (SS/B) <p>(QAP 7-1, Para. 4.2)</p>		

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4	<p>Review the evaluation process used to determine that a proposed procurement is, or is not, subject to QARD requirements.</p> <p>a. Review the process for existing procurements.</p> <p>b. Verify that procurements were processed in a similar manner; i.e., all steps performed, all reviews and qualifications completed.</p> <p>c. QA review and approval for Q and non-Q procurements.</p> <p>(QAP-7-1, Para. 5.1.1)</p>		
5	<p>Review the established requirements for controlling the services of qualified individuals; i.e, Purchase Requisitions, Purchase Orders, and Specific Requirements. Evaluate adequacy and consistency.</p> <p>(QAP-7-1, Para. 5.1.1.E)</p>		

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6	<p>Para. 5.2.1 of QAP-7-1 contains subjective requirements such as "Plan to ensure a systematic approach to the procurement process" and "Considering the level of importance, complexity and quantity of the item or service to be procured." Evaluate the plan preparers interpretation of these requirements and the interpretation of Paras. 5.2.1 A through H. Evaluate the consistency of the requirement between procurements.</p> <ul style="list-style-type: none"> a. What is to be accomplished by the supplier and by the M&O. b. Who is to accomplish it. c. How it is to be accomplished. d. When it is to be accomplished, including sequence of actions and milestones needed to effectively complete the procurement. e. Organizational responsibilities and procurement methods (including identification of the Task Manager and the M&O document(s) to be prepared and/or used to define the technical and quality assurance requirements to be used for the purchase such as a Statement of Work, specification, and/or Task Order) f. Use of a Source Selection Official and a Source Evaluation Board (if applicable) g. Technical and quality assurance requirements (to be refined further in applicable procurement documents, such as a Statement of Work, specification, and/or Task Order) 		

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6 (con.)	h. Approach to be used for offerer qualifications, proposal evaluation, and selection of suppliers. If the procurement is a single source procurement (including transition of an existing procurement to M&O responsibility), the steps of Solicitation, Source Evaluation, Proposal Evaluation, and Source Selection may be modified as necessary to fit the circumstances of the procurement. The Procurement Plan shall identify those steps applicable to the procurement and the QAP-4-1 review shall assure that the applicable QARD requirements are satisfied.		
7	Evaluate the process for procurement of Commercial Grade Items (CGI). What standards and procedures apply and what training is available or planned. (QAP-4-1, Para. 5.2.1f)		

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8	<p>Evaluate the Plan Preparer's interpretation of Para. 5.2.3 and verify the application and consistency of each element for the 6 subject procurements.</p> <p>The Plan Preparer shall provide for the integration of the following activities in the Procurement Plan:</p> <ul style="list-style-type: none"> a. Procurement document preparation, review, approval, and change control in accordance with this QAP and QAP-4-1. b. Solicitation c. Proposal evaluation and qualification of offerers. d. Subcontract award (including procurement source selection.) e. Monitoring and evaluation of supplier performance to include: <ul style="list-style-type: none"> 1. Verification (surveillance, inspection, or audit) activities by the M&O including notifications for any hold and witness points. 2. Control of supplier nonconformances. 3. Supplier Corrective Action. f. Acceptance of item or service. g. Identification of quality assurance records. <p>(Para. 5.2.3)</p>		

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9	Verify that required training is completed for all responsible personnel prior to performing quality affecting work. List all contacted personnel, their training requirements, and completed training records. Look for consistency. Training should include QAPs 2-3, 3-1, 3-5, 3-6, 3-8, 3-12, 4-1, and 7-1 in addition to core training. (QAP 7-1, Para. 5.2.2)		
10	Review any changes to procurement plans to ensure proper review and control. (General)		

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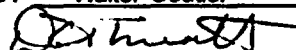
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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
11	Verify that LRC is on distribution for Procurement Plans and that the LRC working file copies are the same revision. (QAP-7-1, Para. 5.2.6)		

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5 CONTROLLING DOCUMENT (Title, Number, Revision) Quality Assurance Requirements and Description (QARD DOE/RW 0333P Rev. 1)			7 ACTIVITY EVALUATED Procurement Document Preparation	
6 ITEM NO.	8 CHARACTERISTICS TO BE EVALUATED		9 REMARKS	10 RESULTS
1	<u>PROCUREMENT DOCUMENT PREPARATION</u> Interview managers/supervisors and determine the interfaces and processes for the preparation, review, and approval of procurement documents Statement of Work Technical specifications Quality requirements Changes and revisions Schedules for deliverables and M&O overview			

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
2	<p>Review the procurement documents and determine/assess adequacy, clarity, and completeness with respect to the procurement plan.</p> <p>Statement of Work</p> <p>Technical specifications</p> <p>Quality requirements</p> <p>Changes and revisions</p> <p>Schedules for deliverables and M&O overview</p>		

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
3	Evaluate documentation for document reviews and determine the effectiveness of the review process Quality/importance of the review comments Resolution and incorporation of review comments Completeness of review		

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
4	Interview designated Reviewers and determine the scope of their reviews and their knowledge of the review process and review criteria.		

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5 DATES OF EVALUATION October 10-14, 1994		6 <input type="checkbox"/> INTERNAL	7 <input type="checkbox"/> SURVEILLANCE		
8 CONTROLLING DOCUMENT (Title, Number, Revision) Quality Assurance and Requirements Description (QARD DOE/RW 0333P, Rev. 1)				9 ACTIVITY EVALUATED Supplier Evaluation and Selection	
10 ITEM NO.	11 CHARACTERISTICS TO BE EVALUATED			12 REMARKS	13 RESULTS
1	<u>SUPPLIER EVALUATION AND SELECTION/PO AWARD</u> Review the supplier evaluation/selection documentation to determine that the specified evaluation/selection criteria was adequate and implemented.				

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2	Review supplier proposals for conformance to procurement document requirements. Assess adequacy, clarity, and completeness.		

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3	<p>Evaluate proposal documentation reviews to assess the adequacy and completeness of the proposal reviews.</p> <p>Adequate interface implemented</p> <p>Scope of the review performed by each participant organization</p> <p>Reviews adequately documented</p> <p>Quality/importance of comments generated</p> <p>Comment resolution and incorporation</p> <p>Resolution of exceptions, alternatives, etc.</p>		

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4	Interview supplier evaluation/selection process participants to assess their understanding and knowledge of the process.		

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5	Verify qualifications and that they were qualified prior to performing the evaluations/selections		

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6	Review purchase orders and changes to determine conformance to the purchase plan/documents requirements. Verify completeness, clarity, and adequacy.		

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
7	<p>Review purchase order and change review documentation and assess</p> <p>Implementation of interface requirements</p> <p>Resolution/incorporation of comments</p> <p>Scope and adequacy of reviews conducted</p> <p>Impact of changes/revisions on technical, QA, and contractual requirements</p>		

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ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
8	Evaluate the selection of the supplier and assess the implementation of, and conformance to, the procurement plan selection criteria.		

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QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
9	Review supplier survey reports and assess the adequacy and effectiveness of the surveys performed		

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QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
10	Evaluate M&O documentation for review and approval of supplier QA Programs. Assess adequacy and effectiveness of the methodology and criteria used.		

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QUALITY ASSURANCE CHECKLIST

* ORGANIZATION EVALUATED M&O	2 <input checked="" type="checkbox"/> EXTERNAL	3 <input checked="" type="checkbox"/> AUDIT	* PREPARED BY <u>Walter Courtier</u> 	
* DATES OF EVALUATION October 10-14, 1994	[] INTERNAL	[] SURVEILLANCE	DATE <u>10/4/94</u>	
* CONTROLLING DOCUMENT (Title, Number, Revision) Quality Assurance Requirements and Description (QARD DOE/RW 0333P, Rev. 1)			* ACTIVITY EVALUATED Post Award Activities	
* ITEM NO.	* CHARACTERISTICS TO BE EVALUATED		10 REMARKS	11 RESULTS
1	<u>POST AWARD ACTIVITIES</u> Review technical, QA, and contractual overview reports/schedules and evaluate their adequacy and effectiveness with respect to achieving supplier contract performance.			

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QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
2	<p>Evaluate the methodology and documentation used to monitor suppliers performance.</p> <p>Technical monitoring</p> <p>Contractual monitoring</p> <p>Schedule monitoring</p> <p>Audits/surveillance</p> <p>Expediting</p> <p>Supplier reports</p> <p>Meeting minutes</p> <p>Management overview/assessment/involvement</p>		

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AUDIT/SURVEILLANCE
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QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
3	<p>Evaluate the nonconformance and corrective action process for adequacy, timeliness, and effectiveness.</p> <p>Problems identification</p> <p>Technical dispositions</p> <p>Corrective/preventive actions</p> <p>QA concurrence</p> <p>Followup verification/closeout</p> <p>Tracking and trending</p>		

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QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
4	<p>Evaluate the QA audit/surveillance program to assess program adequacy and effectiveness for controlling subcontracted activities.</p> <p>Purpose and scope of audits/surveillances</p> <p>Schedule of visits verses suppliers scheduled activities</p> <p>Audit/surveillance results and problem identification</p> <p>Qualifications of personnel</p> <p>Timeliness of report distribution and distributees</p> <p>Adequacy of report content; coverage of suppliers activities</p> <p>Audit followup, verification, and closeout</p>		

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QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
5	<p>Review Hold/Witness Point documentation and evaluate supplier compliance and the adequacy and effectiveness of the program.</p> <p>Hold/Witness Points identified for critical/key process stages/activity.</p> <p>Waivers granted are adequately documented and justified</p> <p>Proper approvals obtained for waivers granted</p> <p>Hold/Witness Point verification results adequately documented</p> <p>Hold/Witness Point releases justified and documented</p>		

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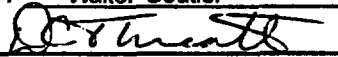
QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
6	Interview personnel involved in the audit/surveillance and hold/ witness point processes to assess their understanding and knowledge of the applicable criteria and requirements		

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QUALITY ASSURANCE CHECKLIST

1 ORGANIZATION EVALUATED M&O	2 <input checked="" type="checkbox"/> EXTERNAL <input type="checkbox"/> INTERNAL	3 <input checked="" type="checkbox"/> AUDIT <input type="checkbox"/> SURVEILLANCE	4 PREPARED BY <u>Walter Coutier</u>  DATE <u>9/29/94</u>	
5 CONTROLLING DOCUMENT (Title, Number, Revision) Quality Assurance Requirements and Description (QARD DOE/RW 0333P, Rev. 1)			6 ACTIVITY EVALUATED Evaluation and Acceptance	
7 ITEM NO.	8 CHARACTERISTICS TO BE EVALUATED		9 REMARKS	10 RESULTS
1	<u>EVALUATION AND ACCEPTANCE</u> Review and evaluate deliverables, acceptance documentation, and records turnover packages to assess their conformance to contractual requirements, adequacy, and process effectiveness.			

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QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
2	<p>Evaluate the methodology and criteria for the receipt, review, approval, and acceptance of supplier deliverables, including records.</p> <p>Adequacy and effectiveness of tracking and statusing</p> <p>Adequacy/effectiveness of distribution for review/acceptance</p> <p>Evaluate review/acceptance documentation for adequacy/completeness</p> <p>Review deliverables and records for legibility, completeness, and conformance to contract requirements</p>		

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QUALITY ASSURANCE CHECKLIST (continuation sheet)

ITEM NO.	CHARACTERISTIC TO BE EVALUATED	REMARKS Record objective evidence reviewed, method of verification, personnel contacted	RESULTS
3	<p>Evaluate the methodology for final procurement closeout.</p> <p>M&O verification of contract fulfillment and acceptance prior to final payment to the supplier</p> <p>Adequacy and effectiveness of the methodology/system utilized</p>		