

1810
25/93

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES NONCONFORMANCE REPORT

Project No. 20-01402-159

NCR No. 2001-12

PART 1: DESCRIPTION OF NONCONFORMANCE

While conducting an internal review of project files, some discrepancies were noted, specifically, under the purchase requisition/purchase order segment of the files. The review found that at times Division 20 staff personnel has other division employees doing work for the CNWRA. These employees have been ordering supplies and/or services via purchase requisition, but not in accordance with QAP-016, Procurement, procedure requirements. Paragraph 5.1.1 specifically requires that when quality-affecting goods or services are required, applicable "Quality Requirements" or Q-notes are to be referenced on the requisition. (Copies of purchase requisitions are being received from purchasing after the fact.) Additionally, after acceptance or rejection of the item the receipt traveler is not being forwarded to the financial clerk in accordance with paragraph 7.1.1 of the same procedure.

Initiated by: Roseanne Ard *RA* *SDM* Date: 07/12/01
Action Required by: Vijay Jain - 04102.571 [(O.Moghissi-04331 & R9216), (L. Yang-R9209), & (D. Dunn -04382)]; L. McKague (C. Connor-03895); A. Chowdhury - 01405.041

PART 2: PROPOSED DISPOSITION AND CORRECTIVE ACTION

Response Date: 7/26/01

Disposition: Accept items as delivered and received.

Basis of Disposition: Based on the information provided by the Element Managers named above, only one of the orders involved quality-affecting purchases. That one item, a hole drilled to mount a test specimen, was determined acceptable by the Principal Investigator based on the proper fit to the test apparatus.

Action to correct nonconformance: As part of the disposition of this NCR, the Element Managers listed above reviewed their identified purchase and individually discussed the situation with their key Element staff. In addition, a special procurement training e-mail message (attached in this package) was sent out to all CNWRA staff instructing them of the need to put "Quality Requirements" or "Q-Notes" for purchase requisitions ordering any quality-affecting goods or services.

Note that the delay in closing this NCR because of a major NRC/DOE Technical Exchange involving key staff in Las Vegas the week of July 23, 2001.

Target date for completion: Action Completed

Proposed by: *[Signature]*

Date: 7/31/01

PART 3: APPROVAL

Element Manager: *[Signature]* Date: 7-31-2001 7/31/01

Director of QA: *[Signature]* - 7/31/01 Date: 7/31/2001

Comments/Instructions:

PART 4: CLOSE OUT

*The 3 identified EMs have responded on the evaluations to their respective comments: purchase requisitions. The final result is that only one purchase was made which should have contained a **

Distribution: Original - CNWRA QA Director/QA Records
ORIGINATOR
Principal Investigators - O. Moghissi, L. Yang, D. Dunn
Element Managers
B. Sagar/H. Garcia

Verified by: *[Signature]* Date: 8/2/01

* technical/quality requirement. This item was accepted by the P.I. & the Director of QA. CNWRA FORM QAP 9-1 has reinforced procurement requirements by E-mail (ref. E-mail 7/29/01). No further action is required.

3810
26/93

Subject: QAP-16, PROCUREMENTTRAINING

Date: Fri, 27 Jul 2001 15:01:59 -0500

From: Bruce Mabrito <bmabrito@gargol.cnwra.swri.edu>

Organization: CNWRA

To: STAFF-GROUP<STAFF_GROUP@gargol.cnwra.swri.edu>

Training Objective: To reinforce the requirements of the CNWRA Procurement Procedure.

Training Content: Portions of QAP-16, Procurement.

Recently it was noted that not everyone is complying with all the provisions of QAP-16 and Nonconformance Report (NCR) 2001-12 was initiated. This training is being sent in specific response to that NCR.

QAP-16, Para. 5.5.1, requires that when quality-affecting goods or services are being purchased, "**Quality Requirements**" or "**Q-Notes**" are to be listed on the purchase requisition. This requirement is not being met in all cases. In addition, copies of purchase requisitions have been received after goods or services have already arrived at the CNWRA or in SwRI Divisions working for the CNWRA.

To make the message simple and to the point, please consider the following.

1. When ordering a material or service for quality-affecting goods or services (meaning those that will have an impact on the quality of the data we produce and meaning that the goods are most likely materials being tested or directly utilized in the tests), ALWAYS put "Quality Requirements:" on the purchase requisition.
2. Quality Requirements are characteristics of an item. Such as, the material is to be cut X-inches long and wide, with a tolerance of plus or minus 0.010-inch, or, the chemical standard ordered must have a purity level of greater than 97%. The Quality Requirement words for quality-affecting goods and services can take many forms and it is a requirement in our contract that these words be referenced on the purchase requisitions.
3. **We order goods and services first** using a purchase requisition properly completed. **We then receive those goods or services.** Then we **inspect** those goods or services and, in effect, the CNWRA technical staff member writes a "receiving report." That typically takes place on the "SwRI Receipt Traveler" or on the Invoice from the consultant we utilize. That "receiving report" is the objective evidence that the CNWRA has formally accepted the supplier's goods or services.

Please call if this is not clear or if you have any procurement questions at all.
Bruce Mabrito x 5149

cc: Training Records/202

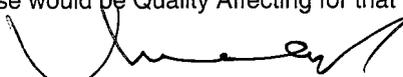
2810
27/93

Asadul Chowdhury

From: Asadul Chowdhury [achowdhury@gargol.cnwra.swri.edu]
Sent: Monday, July 30, 2001 2:55 PM
To: Bruce Mabrito (bmabrito)
Cc: Asadul Chowdhury (achowdhury)
Subject: NCR No. 2001 - 12

Bruce:

With regards to PO's 188202V, 188247V, and 188442V, the first one includes Transparency Film and one Zip Disk, the second one includes two Zip Disks, and the third one includes Binder Sheets. All these are for project no. 20.01405.041. I do not believe these would be Quality Affecting for that project and Quality Requirements or Q notes were not needed.



Asad Chowdhury

7-30-01

4810
28/53

Subject: NCR 2001-12

Date: Thu, 26 Jul 2001 17:23:20 -0500

From: Larry McKague <lmckague@gargol.cnwra.swri.edu>

Organization: CNWRA

To: "Bruce Mabrito (bmabrito)" <bmabrito@gargol.cnwra.swri.edu>

With regards to PO's 121243c, 121143c and 192456w. The first was for cable connectors and cable clamps. The second was for MILSPEC STR.PLUG W/CABLE CLAMP.SIZE 8, 2 SOCKET CONTACTS. Both PO's were under 20.03895 which is for a NASA grant to Chuck Connor. I do not believe these would be Quality Affecting for that project and Quality Requirements or Q notes were not needed.

The third PO was for an unidentified project (20.04382.01.101) for what I believe was for a non destructive testing parts(?) and was unrelated to anything I am aware of going on in Div. 20.

Larry McKague <lmckague>

*From Larry McKague
Addressing NCR
2001-12
BSU
7/26/2001*

Subject: Meeting on the NCR -- 8:30 a.m. Wednesday morning

Date: Tue, 17 Jul 2001 17:53:46 -0500

From: Bruce Mabrito <bmabrito@gargol.cnwra.swri.edu>

Organization: CNWRA

To: "Budhi Sagar (bsagar)" <bsagar@gargol.cnwra.swri.edu>,
Goodluck Ofoegbu <ofoegbu@gargol.cnwra.swri.edu>,
"Lawrence Mckague (lmckague)" <lmckague@gargol.cnwra.swri.edu>,
"Vijay Jain (vjain)" <vjain@gargol.cnwra.swri.edu>, mehnstromQswri.org
CC: "Roseanne Ard (rard)" <rard@gargol.cnwra.swri.edu>

I am asking for a short meeting, in conference room A132, before the YM Team meeting, to talk about the Purchase Requisitions and Purchase Orders. 8:30 a.m. Wednesday morning. Vijay travels about 9:30 a.m. and will not return before Budhi goes on vacation.

This is directly related to the nonconformance report written recently, which lists EMS Jain, McKague and Chowdhury as the lead responders.

This may be very easy, but you all should be aware of the problem and help design a solution. I am not in that business directly. I need your assistance to make sure "it sticks."
Bruce

Subject: Nonconformance Report 2001-12

Date: Thu, 12 Jul 2001 18:33:54 -0500

From: Bruce Mabrito cbmabrito@gargol.cnwra.swri.edu>

Organization: CNWRA

To: "Vijay Jain (vjain)" <vjain@gargol.cnwra.swri.edu>,
"Lawrence Mckague (lmckague)" <lmckague@gargol.cnwra.swri.edu>,
"Asadul Chowdhury (achowdhury)" <achowdhury@gargol.cnwra.swri.edu>

CC: "Oliver Moghissi (omoghissi)" <omoghissi@gargol.cnwra.swri.edu>,
Lietai Yang <lyyang@gargol.cnwra.swri.edu>,
"Darrell Dunn (ddunn)" <cddunn@gargol.cnwra.swri.edu>,
"Budhi Sagar (bsagar)" <bsagar@gargol.cnwra.swri.edu>

Nonconformance Report 2001-12 has been written and issued to V. Jain, L. McKague, and A. Chowdhury. This is to document discrepancies noted in the purchase requisitions/purchase orders of the CNWRA. This is an action item for each of you.

The ordering of supplies and services has not been in strict accordance with QAP-016, Procurement. Please read the NCR carefully. I would like each of you to return the form to QA with your own proposed disposition, the reason for the disposition and your planned action to correct the nonconformance. If you do not wish to respond separately, you can provide one response to me, but that would have to address all areas identified.

Please note that I need a response by July 26, 2001. The corrective actions do not have to be completed by that date however. Roseanne Ard has copies of the identified nonconforming purchase requisitions/purchase orders. I look forward to your responses and the corrective actions so that the likelihood of recurrence is substantially reduced.

Thanks for your help.

Bruce

Southwest Research Institute
 6220 Culebra Road
 San Antonio, TX 78238-5166

Purchase Order: X52961J

Page: 1 of 1
 Date Printed: 09/11/2000

Order To: TEXAS TOOL MAKERS
 11411 E. COKER LOOP
 SAN ANTONIO, TX 78216

100987

Ship To: Southwest Research Institute
 6220 Culebra Road
 San Antonio, TX 78238-5166

*Not needed
 Have P.I.s*

ORDER DATE	BUYER	TERMS	FOB	SALES ORDER	SHIP VIA	DELIVER TO	
09/08/00	Jesse Lozano	NET 30	DESTINATION		THEIR TRUCK	MACHINE SHOP BLDG 162	
ITEM/DESCRIPTION	REV	U/M	DUE DATE	DESIRED DATE	QUANTITY	NET UNIT COST	EXTENDED COST
<p>***** CONFIRMATION *****</p> <p>This is a rated order certified for national defense use, and the contractor shall follow all requirements of the Defense Allocations System Regulation (15 CFR Part 700).</p>							
MISC DRILL HOLE IN STAINLESS STEEL 009 ENCLOSED WITH SHIPMENT	S		JOB 09/15/00	09/15/00	1.0000	150.0001	\$150.00
<p>PECIMEN PER DWG/20-01402-571- <i>65- 7/26/2001</i></p> <p>Req: 551993</p> <p>Prime Contract #: NRC0297009 AOP: 704-000 1.20</p> <p>Priority: N/A 01402.571</p> <p>NOTE: SHIPPING TICKET 350059</p> <p>THE GENERAL PURCHASE ORDER TERMS AND CONDITIONS ATTACHED ARE MADE A PART OF THIS ORDER. PLEASE SIGN AND RETURN A PHOTOCOPY ACKNOWLEDGING ORDER WITHIN 5 WORKING DAYS.</p> <p>Bill To: Southwest Research Institute P.O. Drawer 28510 Attention: Accounts Payable San Antonio, TX 78228-0510</p> <p><i>NOTE: BASED ON A DISCUSSION WITH S. BRUSSIA 7/26/2001, IT WAS DETERMINED THAT THE P.I.S. COULD ACCEPT THE SPECIMEN WITH THE DRILLED HOLE BECAUSE THE TEST SPECIMENT PROPERLY FIT THE TEST APPARATUS. THE CALIBER P.I.S. DETERMINED THE FIT WAS ACCEPTABLE AND IT WAS RECEIVED UNDER THESE CONDITIONS. 7/26/2001</i></p> <p>PO Total Amt: \$150.00</p>							
Authorized Signatures							<p>7810 3/1/93</p>



PURCHASE

52701 M-9

and any other correspondence

REQ. NO.

ENDOR TEXAS TOOLMAKERS		DATE OF ORDER 9/8/00	SHIP VIA <i>Montreal</i>	SUGGESTED SUPPLIER	
11411 E. COKER LOOP		F.O.B. POINT <i>East</i>	TERMS <i>Net 30</i>		
SAN ANTONIO, TX 78216		CONTRACT NO.			
VENDOR CODE 100987	ATTN: MIKE	PHONE		FAX	

cm

DRILL HOLE IN STAINLESS STEEL SPECIMEN PER
DWG/20-01402-571-009 ENCLOSED WITH SHIPMENT

#150.00

*** CONFIRMING ORDER ***

SHIPPING TICKET NO. 350059

RECEIVED
TOTAL

SEP - 8 00

REQUIRED DATE <i>9-15-00</i>	DELIVERY DATE 9-7-00	TO BE USED FOR	DELIVER TO NAME/LOCATION	SPECIAL INSTRUCTIONS
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DEPARTMENTAL/DIVISIONAL APPROVAL HAL KING 2147 <i>[Signature]</i> DATE ADMIN. APPROVAL DATE <i>9-8-00</i>	your need? <input type="checkbox"/> YES <input type="checkbox"/> NO If "NO", and total estimate exceeds \$3000.00, attach a memo of explanation.	If "NO", and total estimate exceeds \$3000.00, attach a memo of explanation.	3. If this requisition is for a repair-is the repair on campus or off campus? <input type="checkbox"/> ON <input type="checkbox"/> OFF If OFF CAMPUS indicate shipping ticket #
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4. Government Project? <input type="checkbox"/> YES <input type="checkbox"/> NO If the item is being charged to a government contract: a. Will it be substantially consumed, destroyed, or exhausted during the performance of the project? <input type="checkbox"/> YES <input type="checkbox"/> NO	b. If "NO", will it be attached to, built into, or used as an accessory to a piece of equipment either in existence or to be constructed? <input type="checkbox"/> YES <input type="checkbox"/> NO c. If "NO", is the item uniquely required to instrument the project that is funding the purchase? <input type="checkbox"/> YES <input type="checkbox"/> NO	d. Is government furnished property being sent to vendor? <input type="checkbox"/> YES <input type="checkbox"/> NO e. OA Approval (if required) Date	f. OA Footnotes: g. Inspection Criteria:	5. Do you want receiving to open and inspect your shipment? <input type="checkbox"/> YES <input type="checkbox"/> NO SEE INSTRUCTIONS ON REVERSE SIDE
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CONTRACT ADMINISTRATOR	DATE	BUYER SIGNATURE	DATE	EXPEDITE DATE
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PO#	Project #	Vendor	Description of items	QA affecting items (Yes/No)
142891G	04331 GTI	Author Valve and Fitting	Fittings and Tubing	No. Items purchased are standard fittings and tubing. Items were not purchased for the NRC program.
125351D	04331 GTI	Newage Industries	Tubing Fittings and adaptors	No. Items purchased are standard fittings and tubing. adaptors Items were not purchased for the NRC program.
1534965	04331 GTI	Hastik and Associates	Valve kit for pump	No. Item purchased was vendor specific valve for pump. Items were not purchased for the NRC program.
1535195	04331 GTI	Metal Samples	1018 carbon steel electrode	No. Items are test specimens for microbial induced corrosion tests as part of the GTI program. Metal test specimens that are not used in the NRC program do not require independent compositional analyses.
131320E	04331 GTI	Fisher Scientific	Sodium chloride	No. Vendor is on ASL . Sodium Chloride was not purchased as part of the NRC program.
131000E	0433 GTI	Praxair	Ultra High Purity Nitrogen	No. Supplies purchased were not for use in the NRC program. No confirmatory analyses procedure exists for compressed gasses.,No purchase requisitions are generated for the purchase of compressed gasses. Orders are phoned in.
1411996	R9216 IR&D	San Tex Cutting Tools	Various machining tools	No. Standard machine shop items needed to fabricate disbonded coating coupon. Items not purchased for NRC program.

Provided by Dr. Vijay Jain 7/23/2001
Ben

X52961J	1402-571 NRC	Texas Toolmakers	Machine specimen as per CNWRA drawing	Yes. CNWRA drawing provided to vendor. Vendor is on ASL.
148699H	50% 1402.571 50% GNA67.101	Nace International	Publication page charges	No. This purchase requisition is for the publication fees for a paper in Corrosion Journal.
153928J	01402.571 NRC	McMaster- Carr	Hand wheel attached to load pan used for stress corrosion cracking tests	No. Item is used to load and unload tank that applies load to stress corrosion crack specimens. Load applied to specimen is independently measured using calibrated load cell.
1531295	01402.571 NRC	Plastic Supply	Teflon	No. Teflon stock used to machine test cells.
169166M	01402.571 NRC	Acopain	Electrical components	No. Components used to build signal conditioner for DC potential drop measurement of stress corrosion cracking. Unit is not presently used in NRC program. Performance of complete system will be verified prior to use in NRC program.