

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

## CORRECTIVE ACTION REQUEST

CAR No: 2003-1

Associated AR, SR, NCR No:

### PART A: DESCRIPTION OF CONDITION ADVERSE TO QUALITY

IM 06002.01.041.304, "CNWRA Contribution to the Observation Report of the Performance-based Audit of Software ..." dated June 30, 2003 was delivered to NRC with 10 spelling errors and numerous editorial problems.

**Initiated by:** R. Brient  
**Date:** July 15, 2003,

**Responsible Individual:** R. Brient  
**Response Due:** August 12, 2003

### PART B: PROPOSED ACTION

#### 1) Extent of Condition:

According to NRC, the two previous observation audits reports in FY 2003 also had editorial deficiencies, but this was not formally communicated to the CNWRA by the NRC. Editorial deficiency and spelling error trends have not been identified in other CNWRA deliverables.

#### 2) Root Cause:

##### Investigation:

- Contrary to QAP-002, Review of CNWRA Documents, Reports, and Papers, editorial reviews were not identified as being required in review planning documents (i.e., the AP-6 forms) for the FY 2003 External Quality Assurance (EQA) deliverables. Editorial reviews are required by QAP-002, "Review of CNWRA Documents, Reports, and Papers" for all technical report deliverables. The Director of QA interpreted QAP-002 such that the editorial review did not need to be indicated on the AP-6 form if the editorial review was to be conducted by the manager. Editorial reviews had been conducted, but were not specifically identified on the AP-6 forms.
- As permitted by QAP-002, the Director of QA chose to perform editorial reviews himself. This option was selected because (i) he felt that he was capable of performing adequate editorial reviews and (ii) he needed to do the technical and editorial reviews simultaneously in order to meet tight delivery schedules.
- An inspection of review documentation for more than 30 technical reports from other CNWRA elements and organizations delivered in FY 2003 revealed that all had editorial reviews properly designated as being required. Therefore, the deficiencies were limited to EQA deliverables. Further review of FY 2001 and 2002 EQA deliverables likewise had AP-6 forms that did not indicate editorial reviews as required.
- The verification of compliance required by QAP-002, section 5.7, did not detect that editorial reviews had not been called for on the AP-6 forms by the responsible manager. (QAP-002 reviews are performed by QA staff.) However, this oversight did not substantively affect the deficient EQA reports because editorial reviews had been conducted, just not explicitly documented.
- Most EQA deliverables for FY 2001, 2002, and 2003 had the technical reviews as well as the QAP-002 compliance reviews performed by the same person, the Director of QA. This person also had overall responsibility for these deliverables.
- Spelling errors were introduced into IM 06002.01.041.304 when the word processor 'find and replace' function was incorrectly used. A final electronic spell check of the document was not performed after errors were introduced. The report author made changes to the report on a laptop computer during comment resolution. Although this is not prohibited procedurally, the CNWRA Editorial Style Guide establishes as a good practice that all changes to "author final" documents be made by the support staff. This practice maintains configuration control of draft documents and revisions to the drafts, and assures consistent application of professional word processing practices.

##### Root Causes:

- Error in judgement and schedule pressures. In choosing to conduct editorial reviews himself and simultaneously with technical reviews, the Director of QA misjudged the level of effort and skills needed to perform adequate editorial reviews.
- Failure to follow established procedure. The Director of QA did not indicate that editorial review was required, though this is clearly indicated in Table 1 of QAP-002.
- Inadequate training in applicable procedure. QAP-002 compliance reviewers had a uniformly incorrect understanding of the editorial review requirements of QAP-002 and did not consult the procedure when conducting the reviews.
- Insufficient independence of person performing compliance over-checks. Because the individual completing the review instructions was, in most cases, the same person who conducted the compliance review, there was no opportunity for the error to be detected.
- Lack of adherence to established good practices. Report author(s) were permitted to retain/regain control of documents after the review process was initiated, contrary to the recommended practice in the CNWRA Editorial Style Guide.

#### 3) Remedial Action:

**Proposed Completion Date:** N/A

None is necessary. NRC staff has indicated that rework and re-submittal of IM 06002.01.041.304 is not necessary.

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

## CORRECTIVE ACTION REQUEST

CAR No: 2003-1 \_\_\_\_\_

Associated AR, SR, NCR No: \_\_\_\_\_

**4) Corrective Action to Preclude Recurrence:****Proposed Completion Date:** September 30, 2003

- In an action unrelated to this CAR, the Director of QA responsible during development of the subject deliverables was transferred to another department effective July 5, 2003, and is no longer responsible for CNWRA products. The new Director of QA has been trained regarding QAP-002 requirements and will apply them. [Training acknowledgment is objective evidence of training.]
- The new Director of QA will require that editorial reviews of complex QA reports, such as observation audit reports, will be conducted by professional editors.
- QA staff assigned to the CNWRA will be re-trained regarding the scope of the QAP-002 compliance reviews and acceptance criteria.
- QAP-002 will be revised to require that QAP-002 compliance verifications of QA deliverables will be performed by qualified individuals independent of the development and management of the product.
- EQA report authors and CNWRA support staff will be re-trained regarding spell checks, possession and responsibility for electronic documents during review, and word processing responsibilities during comment resolution. Consideration will be given to making the good practice a procedural requirement.
- In order to address schedule pressures that adversely affected the review and word processing activities, an operating procedure will be developed for Observation Audit Report Preparation (OARP) that provides for advanced report planning, timely input from individual observers and conclusion from the observation team, timely resolution of observer contributions, and firm schedule guidelines in order to meet NRC delivery requirements.
- Consideration will be given to incorporating the OARP procedure into the audit observer training module when it is next revised.

Element Manager/Director: R. D. Brient *R. D. Brient*

Date: Revised August 13, 2003

**PART C: APPROVAL**  
Comments/Instructions*PRESIDENT*  
*CNWRA*  
Director of QA: *Mesley Patrick*Date: *8/13/2003***PART D: VERIFICATION OF CORRECTIVE ACTION IMPLEMENTATION**Verified by: *Mesley Patrick*Date: *9/25/2003*
**Distribution:**  
 Original-CNWRA/QA DIRECTOR QA Records  
 ORIGINATOR  
 PRINCIPAL INVESTIGATORS  
 ELEMENT MANAGERS  
 TECHNICAL DIRECTOR  
 CNWRA PRESIDENT

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

## CORRECTIVE ACTION REQUEST

CAR No: 2003-1

Associated AR, SR, NCR No:

**PART A: DESCRIPTION OF CONDITION ADVERSE TO QUALITY**

IM 06002.01.041.304, "CNWRA Contribution to the Observation Report of the Performance Based Audit of Software ..." dated June 30, 2003 was delivered to NRC with 10 spelling errors and numerous editorial problems.

Initiated by: R. Brient  
Date: July 15, 2003

Responsible Individual: R. Brient  
Response Due: August 12, 2003

**PART B: PROPOSED ACTION**
**1) Extent of Condition:**

A total of 22 recent technical reports were reviewed to determine whether editorial reviews had been conducted. Three of these did not need editorial reviews because editing would be performed by NRC or a minor document change did not require editing. Of the remaining 19 reports, 16 had editorial reviews (3 were performed by EMs, 13 by the SwRI Publications Department). Three technical reports did not indicate editorial reviews as being required; all were External QA deliverables. The condition does not appear to extend to other CNWRA deliverables or organizational units.

**2) Root Cause:**

- a) QAP-002 requires that IMs receive Editorial Reviews (either by the SwRI Publications Department or the Element Manager), however, an Editorial Review was not indicated as required on the document review request form AP-6 for this deliverable.
- b) QAP-002 requires that a spell check be performed during Format Review; apparently this was not done, or changes were made to the document after the spell check was performed.
- c) Inadequate time was provided to perform adequate reviews. The document was a work in progress up until delivery. All reviews were completed in one day (June 30, 2003).
- d) Although all contributions from observation team members are intended to be collected by the end of the audit being observed, input was being provided by observers as late as 8 days after the audit observation, significantly reducing the time available for document review.
- e) The detailed organization of the report was determined during report preparation and took more time to accomplish. This was because the scope of this audit was much greater than previous audits and the report was more complex than could be covered by the guidance provided in the report template that was used on previous reports.
- f) The observation audit report was 28 pages in length, probably much larger than can reasonably be prepared within the 10-12 working day delivery commitment to the NRC.

**3) Remedial Action:**

Proposed Completion Date: N/A

None is necessary. NRC staff have indicated that rework and re-submittal of IM 06002.01.041.304 is not necessary.

**4) Corrective Action to Preclude Recurrence:**

Proposed Completion Date: September 30, 2003

The document preparation and review process will be evaluated for potential improvements. Pending the results of this review, the following specific changes are tentatively planned.

- a) Perform editorial reviews on EQA deliverables, by Publications Department staff to the extent appropriate to meet quality and timeliness standards.
- b) The document preparation process will be evaluated to determine whether changes are needed to emphasize building quality in at the preparation stage, rather than relying on the checking/reviewing process, particularly in regard to the responsibilities for spell checking. The need to perform spell checks by word-processing staff for each draft will be re-emphasized.
- c, d) A minimum of 3 days will be allocated for Observation Audit report reviews. Therefore, document preparation must be completed within 7 working days after the audit. The report input and preparation process will be streamlined through coordination with NRC staff. All input from the observers must be obtained before the end of the audit to meet the 10-day turnaround commitment.
- e) The report author will be assigned and a detailed report outline will be prepared based on the audit plan prior to departure for the audit. Any questions on the report will be resolved with NRC staff before completion of the audit.
- f) See "c and d" above.

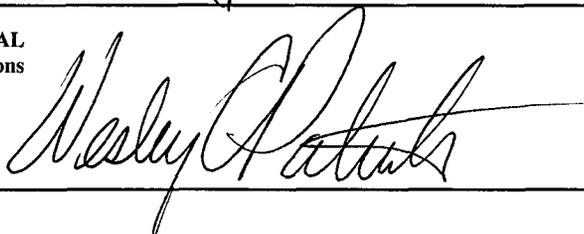
Element Manager/Director: R. D. Brient

Date: July 17, 2003

**PART C: APPROVAL**  
Comments/Instructions

Director of QA:

Date:



7/17/2003

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES

## CORRECTIVE ACTION REQUEST

CAR No: 2003-1

Associated AR, SR, NCR No:

**PART D: VERIFICATION OF CORRECTIVE ACTION IMPLEMENTATION**

**Distribution:**  
Original-CNWRA/QA DIRECTOR QA Records  
ORIGINATOR  
PRINCIPAL INVESTIGATORS  
ELEMENT MANAGERS  
TECHNICAL DIRECTOR  
CNWRA PRESIDENT

Verified by:

Date:

CNWRA CAR 2003-1 Close Out

CAR 2003-1 Corrective Action Proposed	Action Completed & Objective Evidence
<p>1. In an action unrelated to this CAR, the Director of QA responsible during development of the subject deliverables was transferred to another department effective July 5, 2003, and is no longer responsible for CNWRA products. The new Director of QA has been trained regarding QAP-002 requirements and will apply them. [Training acknowledgment is objective evidence of training.]</p>	<p>Training completed, training acknowledgment attached.</p>
<p>2. The new Director of QA will require that editorial reviews of complex QA reports, such as observation audit reports, will be conducted by professional editors.</p>	<p>Professional editorial reviews were performed on all EQA deliverables subsequent to this CAR. Example document review request attached.</p>
<p>3. QA staff assigned to the CNWRA will be re-trained regarding the scope of the QAP-002 compliance reviews and acceptance criteria.</p>	<p>QAP-002 was revised, and Mark Ehnstrom (the QA staff assigned to the CNWRA) was trained. The acknowledgment of training is attached.</p>
<p>4. QAP-002 will be revised to require that QAP-002 compliance verifications of QA deliverables will be performed by qualified individuals independent of the development and management of the product.</p>	<p>QAP-002 was revised (revision 8, change 0) on 8/29/2003 (see attachments). Section 5.8.1 requires QAP-002 verification of QA deliverables to be performed by individuals independent of development of the deliverable.</p>
<p>5. EQA report authors and CNWRA support staff will be re-trained regarding spell checks, possession and responsibility for electronic documents during review, and word processing responsibilities during comment resolution. Consideration will be given to making the good practice a procedural requirement.</p>	<p>Spell checks, possession of documents during reviews and the overall document processing and review flow were discussed with Support staff. (Attendance roster attached.) These same topics were discussed between EQA report authors and the Director, QA.</p>
<p>6. In order to address schedule pressures that adversely affected the review and word processing activities, an operating procedure will be developed for Observation Audit Report Preparation (OARP) that provides for advanced report planning, timely input from individual observers and conclusion from the observation team, timely resolution of observer contributions, and firm schedule guidelines in order to meet NRC delivery requirements.</p>	<p>TOP-025, Preparation of NRC Assessment Reports, was prepared, addressing the noted topics, and was issued on 9/8/2003. This procedure was implemented on the observation audit of 9/8-19/2003 and its report. (see attachment)</p>

7. Consideration will be given to incorporating the OARP procedure into the audit observer training module when it is next revised.

No revision to the training module is currently planned, but these updates will be considered if revision occurs.

**Maria Padilla**

---

**From:** qaweb@cnwra.swri.edu  
**Sent:** Friday, August 29, 2003 4:53 PM  
**To:** mjpgadilla@cnwra.swri.edu  
**Subject:** Robert D. Brient has verified QAP-002

#1

Robert D. Brient Has Verified that they have read and understood QAP-002



**CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES**  
**DOCUMENT REVIEW REQUEST AND TRANSMITTAL CONTROL (REF. QAP-002)**

1/5  
~~the~~

**I. DOCUMENT INFORMATION**

a. TITLE: Inspection Procedure for Audits

**b. DOCUMENT TYPE**

<input type="checkbox"/> Abstract	<input type="checkbox"/> Presentation/Poster	<input type="checkbox"/> Project/Test Plan	<input type="checkbox"/> AP	<input type="checkbox"/> TOP	<input checked="" type="checkbox"/> Technical Report (Publication)
<input type="checkbox"/> Peer-Reviewed	<input type="checkbox"/> OPs Plans	<input type="checkbox"/> CQAM	<input type="checkbox"/> QAP	<input type="checkbox"/> Proposal	<input type="checkbox"/> NRC Guidance

\* Conference/Journal Title: \_\_\_\_\_

Special Markings (e.g., "Predecisional" or "Proprietary") Predecisional Licensing Support Network Yes \_\_\_\_\_ No X

Copyright Permission Yes \_\_\_\_\_ No \_\_\_\_\_

**c. PROJECT INFORMATION**

Project No. 20.06002.01.041 Milestone No. 20.06002.01.041.322 Subject Code \_\_\_\_\_

CNWRD DOCUMENT NO. Yes \_\_\_\_\_ No X Assigned No. CNWRD 200 \_\_\_\_\_

d. SCHEDULE Today's Date 8/19/03 Scheduled Transmittal Date 9/25/03

**II. RESPONSIBILITIES (Fill in names on each blank line in this section.)**

Author(s) R. Weber Element Manager R. Brient Assigned Secretary L. Selvey

**III. REVIEW (See QAP-002 table 1 for applicable review types.)**

Review Types & Reviewers Determined by Element Manager

[Signature] 8/19/03  
 (Element Manager Signature) (Date)

<u>Req'd Date</u>	<u>Initials</u>	<u>Completed</u>
-------------------	-----------------	------------------

<input checked="" type="checkbox"/> TECHNICAL (Attach CNWRD form QAP-12.) Reviewer(s): <u>D. Dunavant</u>	<u>8/22/03</u>	<u>[Signature]</u>	<u>21 Aug 2003</u>
---	----------------	--------------------	--------------------

<input type="checkbox"/> PEER (Attach CNWRD form QAP-13.) Reviewer(s):	_____	_____	_____
---	-------	-------	-------

<input checked="" type="checkbox"/> EDITORIAL Reviewer: <u>B. Long</u>	<u>9/8/03</u>	<u>[Signature]</u>	<u>9-8-03 #2</u>
--	---------------	--------------------	------------------

<input type="checkbox"/> CONCURRENCE Reviewer:	_____	_____	_____
---	-------	-------	-------

<input type="checkbox"/> QUALITY ASSURANCE Reviewer:	_____	_____	_____
---	-------	-------	-------

<input checked="" type="checkbox"/> PROGRAMMATIC/COPYRIGHT PERMISSION Reviewer: <u>B. Sagar</u>	<u>9/11/03</u>	<u>[Signature]</u>	<u>9/11/03</u>
---	----------------	--------------------	----------------

<input checked="" type="checkbox"/> FORMAT Reviewer/Style: <u>B. Caudle R. Mantooth</u>	<u>9/10/03</u>	<u>[Signature]</u>	<u>9-9-03</u>
---	----------------	--------------------	---------------

Verification of Compliance with QAP-002

CNWRD calculations and analyses supporting this report are documented in Scientific Notebook(s): NA

**IV TRANSMITTAL**

TO: Ted Carter FROM: R. Brient

COPIES TO: (Add/delete names as required using current information in "Guidelines for Minimum Distribution of CNWRD Correspondence.")  
 Distribution (listed below)

- |                   |                     |                   |                          |
|-------------------|---------------------|-------------------|--------------------------|
| <u>M. Leach</u>   | <u>W. Reamer</u>    | <u>R. Latta</u>   | <u>w/o enc.</u>          |
| <u>E. Whitt</u>   | <u>K. Stablein</u>  | <u>W. Patrick</u> | <u>CNWRD dir/EMs</u>     |
| <u>B. Meehan</u>  | <u>T. Matula</u>    | <u>B. Sagar</u>   | <u>P. Maldonado</u>      |
| <u>D. DeMarco</u> | <u>J. Schlueter</u> | _____             | <u>Record copy B-IQS</u> |

T. Kobetz



**CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES**  
**DOCUMENT REVIEW REQUEST AND TRANSMITTAL CONTROL (REF. QAP-002)**

1/6

**I. DOCUMENT INFORMATION**

a. TITLE: Inspection Procedure for Scientific Investigations

**b. DOCUMENT TYPE**

<input type="checkbox"/> Abstract	<input type="checkbox"/> Presentation/Poster	<input type="checkbox"/> Project/Test Plan	<input type="checkbox"/> AP	<input type="checkbox"/> TOP	<input checked="" type="checkbox"/> Technical Report (Publication)
<input type="checkbox"/> Peer-Reviewed	<input type="checkbox"/> OPs Plans	<input type="checkbox"/> CQAM	<input type="checkbox"/> QAP	<input type="checkbox"/> Proposal	<input type="checkbox"/> NRC Guidance

\* Conference/Journal Title: \_\_\_\_\_

Special Markings (e.g., "Predecisional" or "Proprietary") Predecisional Licensing Support Network Yes \_\_\_\_\_ No X

Copyright Permission Yes \_\_\_\_\_ No \_\_\_\_\_

**c. PROJECT INFORMATION**

Project No. 20.06002.01.041 Milestone No. 20.06002.01.041.324 Subject Code \_\_\_\_\_

CNWRA DOCUMENT NO. Yes \_\_\_\_\_ No X Assigned No. CNWRA 200 \_\_\_\_\_

d. SCHEDULE Today's Date 8/20/03 Scheduled Transmittal Date 9/25/03

**II. RESPONSIBILITIES (Fill in names on each blank line in this section.)**

Author(s) R. Weber Element Manager R. Brient Assigned Secretary L. Selvey

**III. REVIEW (See QAP-002 table 1 for applicable review types.)**

Review Types & Reviewers Determined by Element Manager

		<u>R. Brient</u> (Element Manager Signature)	<u>8/20/03</u> (Date)
		Req'd Date	Completed
<input checked="" type="checkbox"/>	TECHNICAL (Attach CNWRA form QAP-12.) Reviewer(s): <u>D. Dunavant</u>	<u>8/22/03</u>	<u>21 Aug 2003</u>
<input type="checkbox"/>	PEER (Attach CNWRA form QAP-13.) Reviewer(s):		
<input checked="" type="checkbox"/>	EDITORIAL Reviewer: <u>B. Long</u>	<u>9/8/03</u>	<u>9/8/03 #2</u>
<input type="checkbox"/>	CONCURRENCE Reviewer:		
<input type="checkbox"/>	QUALITY ASSURANCE Reviewer:		
<input checked="" type="checkbox"/>	PROGRAMMATIC/COPYRIGHT PERMISSION Reviewer: <u>B. Sagar</u>	<u>9/11/03</u>	<u>9/19/03</u>
<input checked="" type="checkbox"/>	FORMAT Reviewer/Style: <u>B. Caudle R. Mantooth</u>	<u>9/10/03</u>	<u>9/19/03</u>
	Verification of Compliance with QAP-002	<u>(Signature)</u>	<u>09/10/2003 #4</u>

CNWRA calculations and analyses supporting this report are documented in Scientific Notebook(s): R.H.

**IV TRANSMITTAL**

TO: Ted Carter FROM: R. Brient

COPIES TO: (Add/delete names as required using current information in "Guidelines for Minimum Distribution of CNWRA Correspondence.")  
 Distribution (listed below)

- |                   |                     |                   |                          |
|-------------------|---------------------|-------------------|--------------------------|
| <u>M. Leach</u>   | <u>W. Reamer</u>    | <u>R. Latta</u>   | <u>w/o enc.</u>          |
| <u>E. Whitt</u>   | <u>K. Stablein</u>  | <u>W. Patrick</u> | <u>CNWRA dir/EMs</u>     |
| <u>B. Meehan</u>  | <u>T. Matula</u>    | <u>B. Sagar</u>   | <u>P. Maldonado</u>      |
| <u>D. DeMarco</u> | <u>J. Schlueter</u> |                   | <u>Record copy B-IQS</u> |

T. Kobetz

9

#3

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES DOCUMENT TRANSMITTAL, TRAINING AND ACKNOWLEDGMENT RECORD

TO: Mark Ehnstrom  
SwRI 30  
San Antonio, TX

FROM:  
Document Control  
CNWRA/Division 20  
Southwest Research Institute  
6220 Culebra Rd.  
San Antonio, Texas 78238

Date Sent: 9/4/2003

Attached are the following CNWRA controlled documents:

Document Number	Revision/Change Number	Title
QAP-002	8/0	REVIEW OF CNWRA DOCUMENTS, REPORTS AND PAPERS

### Instructions to Recipients:

1. Review and become familiar with the subject documents. Contact CNWRA QA at 210.522.5149 for additional training.
2. For revisions and changes, mark or discard the superseded documents or document pages and insert the current document or pages.
3. Sign and date the acknowledgment below attesting that the attached controlled or uncontrolled documents, revisions, or changes have been reviewed and understood, and that obsolete documents or pages have been removed.
4. The objective of this training is to ensure that you have reviewed, understood, and are able to implement the attached procedure(s), which are the content of this training.
5. Upon completion, return this form to CNWRA QA/Document Control at the address indicated above within 30 days.

  
\_\_\_\_\_  
Acknowledged by

9/4/03  
\_\_\_\_\_  
Date

#4

<b>CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES</b>  <b>QUALITY ASSURANCE PROCEDURE</b>	Proc. <u>QAP-002</u> Revision <u>8</u> Change <u>0</u> Page <u>1</u> of <u>11</u>
---	---

Title: REVIEW OF CNWRA DOCUMENTS, REPORTS AND PAPERS

EFFECTIVITY

Revision 8 of this procedure became effective on 8/29/2003. This procedure consists of the pages and changes listed below.

<u>Page No.</u>	<u>Change No.</u>	<u>Date Effective</u>
ALL	0	8/29/2003

Supersedes Procedure No. QAP-002, Rev 7, Chg 0 dated 4/04/2002

Approvals			
Written by	Date	Concurrence Review	Date
/s/Robert Brient	8/29/2003	/s/Budhi Sagar	8/29/2003
Quality Assurance	Date	Cognizant Director	Date
/s/Mark Ehnstrom	8/29/2003	/s/Pat Mackin	8/28/2003

CENTER FOR NUCLEAR WASTE  
REGULATORY ANALYSES  
QUALITY ASSURANCE PROCEDURE

Proc. QAP-002

Revision 8 Change 0

Page 9 of 11

5.6.3 CNWRA Programmatic Reviews shall verify the following:

- Contractual requirements are complied with.
- The objectives of applicable CNWRA plans are satisfied.
- The general approach, presentation, and clarity are satisfactory.
- The approach, methods, and/or conclusions are consistent with CNWRA policy.

Programmatic reviewers may require an additional editorial review if a significant number of editorial errors are identified.

5.6.4 The reviewer shall present any comments requiring resolution to the author on form TOP-013 and shall verify that the review item is revised based on the resolution.

5.7 Format Review

5.7.1 Format Reviews shall be performed by personnel who did not format the document under review and are cognizant of document style, format, and distribution requirements.

5.7.2 Format Reviews shall verify the following:

- Document format requirements are complied with.
- Internal and NRC document distribution requirements are met.
- Spelling is correct.

5.8 Verification of Compliance

5.8.1 Verification of Compliance with QAP-002 shall be performed by CNWRA QA staff or a person acting in their capacity after all other steps in the review process have been completed. Verification reviews of QA deliverables shall be performed by qualified individuals independent of the development of the deliverable.

5.8.2 Verification of Compliance with QAP-002 reviews shall determine the following:

- All required review types have been selected and review criteria have been addressed.
- Report Review/Comment Resolution Sheets are complete.
- Documentation package is complete and ready to be filed in QA records.



## Support Staff Training - Deliverable Processing

### CNWRA Editorial Style Guide

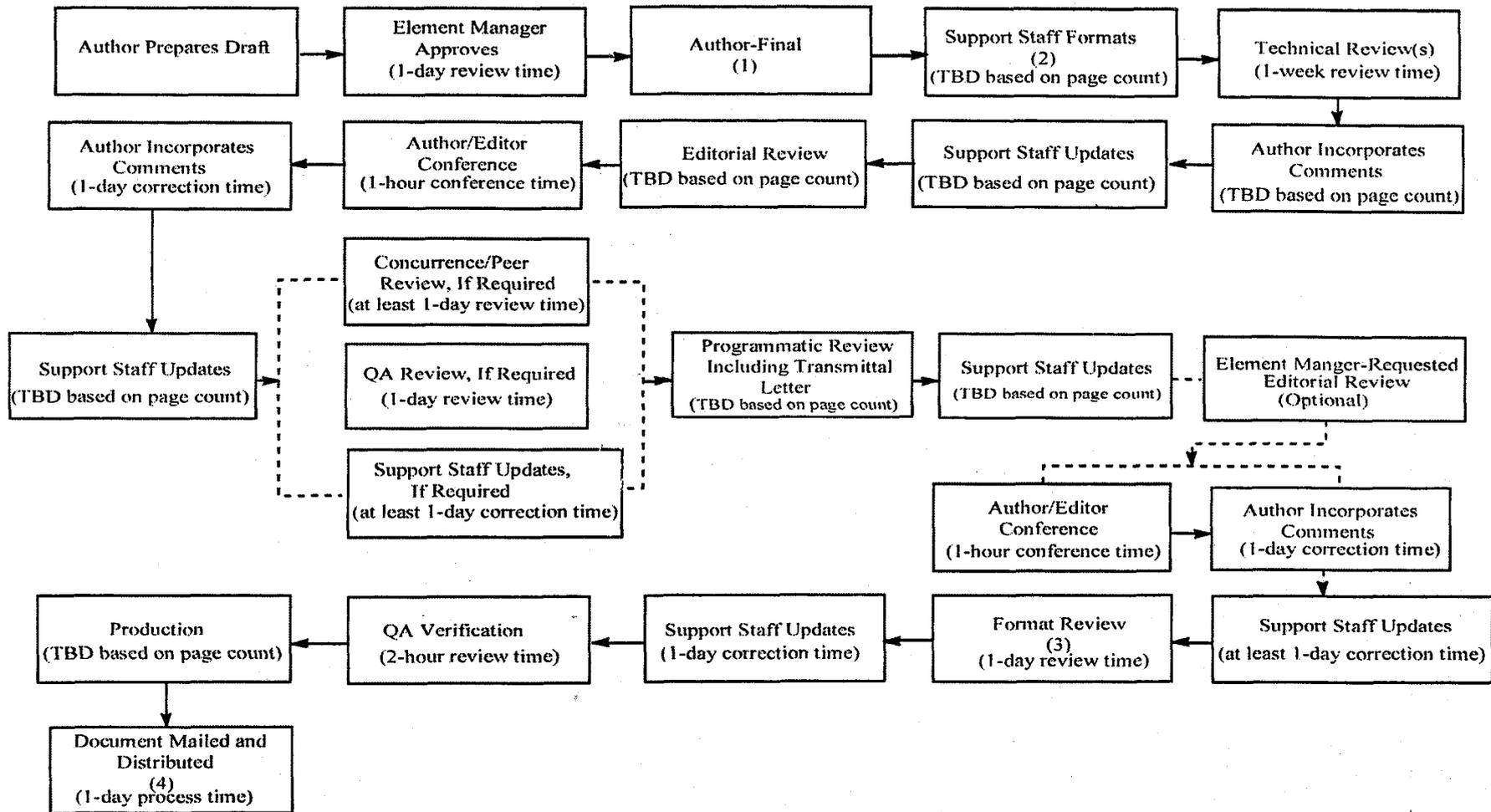
- Support staff have sole possession of electronic files during processing and comment resolution. This is to eliminate the introduction of errors by non-word professional word processors and to maintain configuration control.
- By contract, all IMs and MMs must follow the NRC NUREG for editorial style.
- CNWRA Editorial Style Guide is consistent with the NUREG.
- Persons performing editorial reviews must be familiar with style guide.

### Good Practices

- Perform electronic spell checks after revising each draft document.
- Note that Format reviewers do not have access to the electronic files, so their spelling checks are necessarily spot checks.
- Consult operating procedures (tuti\QA) for guidance. If no procedure, let Pat Mackin or Bob Brient know.

# CNWRA DOCUMENT PREPARATION, REVIEW, AND QA PROCESS

## REVIEW TIMES INDICATED ARE THE MINIMUMS REQUIRED



- (1) Author-final document is complete in all respects including executive summary, text, references, figures/tables, etc.; minimally formatted; and EM approved. Assigned secretary is presented document in acceptable software and processes into CNWRA-accepted format and style.
- (2) Check for completeness: figures/tables and references called out, lists of figures/tables completed, TOC generated, etc.
- (3) See CNWRA Editorial Style Guide.
- (4) Package QA paperwork, including all markups, and provide properly labeled CD containing WP files for letter and document.

11/2001

#5  
#6

<p><b>CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES</b></p> <p><b>TECHNICAL OPERATING PROCEDURE</b></p>	Proc. <u>TOP-025</u> Revision <u>0</u> Page <u>1</u> of <u>4</u>
--	--

Title **TOP-025 Preparation of NRC Assessment Reports**

EFFECTIVITY

Revision 0 of this procedure became effective on August 2003.  
 This procedure consists of the pages and changes listed below.

<u>Page No.</u>	<u>Change No.</u>	<u>Date Effective</u>
ALL	0	9/8/2003

Supersedes Procedure No.

Approvals			
Written by	Date	Technical Review	Date
/s/Robert Brient	9/5/2003	/s/Rod Weber	9/3/2003
Quality Assurance	Date	Cognizant Director	Date
/s/Mark Ehnstrom	9/5/2003	/s/Budhi Sagar	9/5/2003

46

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES DOCUMENT TRANSMITTAL, TRAINING AND ACKNOWLEDGMENT RECORD

TO: Mark Ehnstrom  
SwRI/Div. 30  
6220 Culebra Road

FROM:  
Document Control  
CNWRA/Division 20  
Southwest Research Institute  
6220 Culebra Rd.  
San Antonio, Texas 78238

Date Sent: 09/11/2003

Attached are the following CNWRA controlled documents:

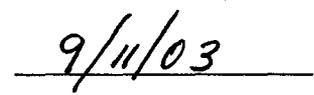
Document Number	Revision/Change Number	Title
TOP-025	0/0	Preparation of Nuclear Regulatory Commission (NRC) Assessment Reports

### Instructions to Recipients:

1. Review and become familiar with the subject documents. Contact CNWRA QA at 210.522.5537 if additional training is needed.
2. For revisions and changes, mark or discard the superseded documents or document pages and insert the current document or pages.
3. Sign and date the acknowledgment below attesting that the attached controlled documents, revisions, or changes have been reviewed and understood, and that obsolete documents or pages have been removed.
4. The objective of this training is to ensure that you have reviewed, understood, and are able to implement the attached procedure(s), which are the content of this training.
5. Upon completion, return this form to CNWRA QA/Document Control at the address indicated above within 30 days.



Acknowledged by



Date

ALC

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES DOCUMENT TRANSMITTAL, TRAINING AND ACKNOWLEDGMENT RECORD

TO: Tom Trbovich  
SwRI/Div. 30  
6220 Culebra Road

FROM:  
Document Control  
CNWRA/Division 20  
Southwest Research Institute  
6220 Culebra Rd.  
San Antonio, Texas 78238

Date Sent: 09/11/2003

Attached are the following CNWRA controlled documents:

Document Number	Revision/Change Number	Title
TOP-025	0/0	Preparation of Nuclear Regulatory Commission (NRC) Assessment Reports

**Instructions to Recipients:**

1. Review and become familiar with the subject documents. Contact CNWRA QA at 210.522.5537 if additional training is needed.
2. For revisions and changes, mark or discard the superseded documents or document pages and insert the current document or pages.
3. Sign and date the acknowledgment below attesting that the attached controlled documents, revisions, or changes have been reviewed and understood, and that obsolete documents or pages have been removed.
4. The objective of this training is to ensure that you have reviewed, understood, and are able to implement the attached procedure(s), which are the content of this training.
5. Upon completion, return this form to CNWRA QA/Document Control at the address indicated above within 30 days.

*T.C. Trbovich*

9/15/03

Acknowledged by

Date

#6

# CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES DOCUMENT TRANSMITTAL, TRAINING AND ACKNOWLEDGMENT RECORD

TO: Rod Weber  
SwRI/Div. 30  
6220 Culebra Road

FROM:  
Document Control  
CNWRA/Division 20  
Southwest Research Institute  
6220 Culebra Rd.  
San Antonio, Texas 78238

Date Sent: 09/11/2003

Attached are the following CNWRA controlled documents:

Document Number	Revision/Change Number	Title
TOP-025	0/0	Preparation of Nuclear Regulatory Commission (NRC) Assessment Reports

### Instructions to Recipients:

1. Review and become familiar with the subject documents. Contact CNWRA QA at 210.522.5537 if additional training is needed.
2. For revisions and changes, mark or discard the superseded documents or document pages and insert the current document or pages.
3. Sign and date the acknowledgment below attesting that the attached controlled documents, revisions, or changes have been reviewed and understood, and that obsolete documents or pages have been removed.
4. The objective of this training is to ensure that you have reviewed, understood, and are able to implement the attached procedure(s), which are the content of this training.
5. Upon completion, return this form to CNWRA QA/Document Control at the address indicated above within 30 days.



9/23/03

Acknowledged by

Date

#6

**Maria Padilla**

---

**From:** qaweb@cnwra.swri.edu  
**Sent:** Thursday, September 11, 2003 3:59 PM  
**To:** mypadilla@cnwra.swri.edu  
**Subject:** Robert D. Brient has verified TOP-025

Robert D. Brient Has Verified that they have read and understood TOP-025