

CENTER FOR NUCLEAR WASTE REGULATORY ANALYSES  
NONCONFORMANCE REPORT

Project No. (Audit 2005-1) 06002.01.031

NCR No. 2005-21

**PART 1: DESCRIPTION OF NONCONFORMANCE**

Contrary to the requirements of QAP-007, Rev. 3, Chg. 1, several position descriptions did not reflect requirements for current job assignments. ( Para. 3.2 (iii))

1. The position description for a person identified as a participant in the ENFE IIRSR resolution reviews does not identify report reviews as part of the description. Also, QAP-002 training had not been provided. (Note: position description identifies duties as laboratory analyst.)
2. The job description for Director of QA does not reference software control or verification responsibilities. Note: The Director of QA is identified as Software Custodian in TOP-018, Section 8, *Definitions* )

Initiated by: R. Weber

Date: May 18, 2005

Action Required by: E. Pearcy/B. Brient

Response Due Date: June 1, 2005

**PART 2: PROPOSED DISPOSITION AND CORRECTIVE ACTION**

**Discussion:** Professional Personnel Qualification Records (PPQR) are intended to present a job description summary in sufficient detail to provide a basis for specifying the education, experience, and specialized skill requirements. The document is not intended to provide an exhaustive statement of specific job assignments or responsibilities.

Observation 1: The position description for M. Juckett was not deficient as a result of not specifically mentioning review activities as part of her responsibilities. Reviewing the work of others, both inside and outside the organization, are routine responsibilities of a technical professional and need not be specifically identified in the PPQR. It is recognized, however, that the position description may be interpreted as limiting Ms. Juckett to laboratory experiments and computer simulations.

Observation 2: The QA Director position description is sufficiently broad to cover all anticipated assignments, including that as the software custodian.

**Disposition:** Accept as is.

**Basis of Disposition:** Both individuals identified in this NCR are qualified to perform all current and past assignments.

**Action to Correct Nonconformance:**

M. Juckett's position description was modified on 5/11/2005 to more broadly describe current and anticipated work assignments. This will minimize the potential for future misinterpretation of the breadth of activities that fall within the general purview of technical professionals.

QAP-007 will be revised to clarify the appropriate level of detail for position descriptions and education, experience, and specialized skills requirements. QAP-11 forms will be updated as necessary to meet the revised criteria during the next planned review period.

Target date for completion: July 30, 2005

Proposed by: E. Pearcy/B. Brient

Date: June 1, 2005

**PART 3: APPROVAL**

Manager: L. McManis [Signature]

Date: 01 June 2005 / June 1, 2005

for E. Records  
Director of QA: [Signature]

Date: 6/11/2005

Comments/Instructions:

**PART 4: CLOSE OUT**

*M. Juckett's position description  
Comments: was verified as being changed on  
5/11/05. QAP-007 was revised on Aug. 5, 2005  
and includes clarification on detail  
required for position descriptions.*

Distribution:  
Original-CENTER QA Records  
ORIGINATOR  
MANAGER  
Asst. DIRECTOR

Verified by: Mary H. Ehnstom Date: 8/8/05