



**GEOSCIENCES AND ENGINEERING DIVISION
QUALITY ASSURANCE
SURVEILLANCE REPORT**

PROJECT NO.: All

REPORT No.: 2007-18

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SURVEILLANCE SCOPE: Procurement Control

REFERENCE DOCUMENTS: QAPs, 012, 016

START DATE: 8/6/07

END DATE: 8/9/07

QA REP: M. Simpson

PERSONS CONDUCTING ACTIVITY (persons contacted):

R. Brient, M. Padilla, S. Garcia, X. He, P. Bertetti, J. Prikryl, M. Roberts

SATISFACTORY FINDINGS:

Background

QAP-012, Quality Assurance Records Control, requires appropriately controlled lifetime retention of selected quality-affecting records, including purchasing. QAP-016, Procurement, refers to QAP-012 for purchasing records requirements. However, it was not until late CY 2005 that GED considered quality-affecting procurement documentation to be QA records; requiring hard-copy collection and controlled storage; i.e., permanently retained in a two-hour fire-rated room/cabinet. Prior to this time procurement records were retained by administrative staff in an uncontrolled manner.

In late 2005, GED procurement records were collected, scanned, and entered into GED's automated document library, ELF. Some of the hard-copy procurement records were then discarded in the routine method utilized by staff for other, non quality-affecting, documentation; i.e., five-year retention. Also at this time, GED QA staff began collecting and maintaining new procurement records under full QA retention controls.

The above situation was not previously in compliance with generally accepted nuclear QA records protocols nor did the revised GED approach fully address the situation. However, no pertinent information has been lost as all pre-2006 materials are available on ELF. Hard-copy records could be recreated from this database if deemed necessary. Using a "risk informed" approach, GED management has determined that such action is not essential at this time but could be selectively or collectively implemented if/as future needs arise. It has also been determined that the situation does not presently warrant tracking in the corrective action program.

General Observations

Records reviewed for this surveillance included those submitted to QA after the December 05/January 06 time period. In addition to QA personnel, interviews were conducted with available members of CNWRA's Geochemistry and Corrosion Science and Process Engineering staffs as a significant majority of the records were generated by these groups. One staff member in particular generated many of these records but was not available during the surveillance.

The conclusion of this surveillance is that GED procurement control is generally satisfactory. There is sufficient evidence to support confidence that only correct items and services are being ordered, accepted, labeled, and applied to GED work. Technical staff appear to be aware of and compliant with the procurement process and appropriate controls are being implemented in the item/service selection and initial approval stages of the process. However, in addition to the records situation

described above, other documentation concerns are evident. These issues are discussed below in the Unsatisfactory Findings and Recommendations sections of this report.

The reviewer considers attention to these concerns to be an overall opportunity for improvement rather than individual corrective actions to multiple nonconformances because, in most cases, corresponding requirements have not been established or the issues appear to be relatively isolated. The small population of procurement packages maintained in QA records and the fact that none of the issues appears to affect the actual procurement and use of appropriate items/services also limits the level of seriousness afforded. One Nonconformance Report (NCR) has been generated to encompass these documentation issues.

Because non quality-affecting documents are systematically discarded, rather than all at once (see Background above), a portion of the procurement records previously maintained by administrative staff are still available for retrieval and inclusion in the QA records system. The QA records coordinator agreed to obtain these records during the course of this surveillance. Also, most procurement records currently under QA control are mislabeled by subject code (308 instead of 701). The records coordinator agreed to make this correction during the course of the surveillance.

UNSATISFACTORY FINDINGS:

- 1) Documentation of item/service receipt acknowledgment is not evident for some procurement packages.
- 2) No management validation of procurement packages is documented (per QAP-012) prior to submittal to QA records. A QA review documented on Form QAP-16 prior to scanning appears to be taking the place of the management review but it does not include a check for accuracy and completeness (e.g., Finding 1), only for scanning readiness.
- 3) The records review form (form QAP-16) is not completely filled out for most packages.
- 4) Isolated instances of missing procurement plan acceptance and requisition form signature were found.

NCR NO.: 2007-30

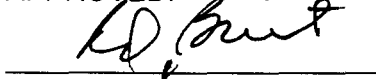
CAR NO.: None

ATTACHMENTS: None

RECOMMENDATIONS/ACTIONS:

- 1) A consistent method for documentation of receipt acknowledgment should be specified. Currently it is usually in the margins (or elsewhere) on the approved purchase requisition (as required) but may also appear on other associated documentation. One example (but not the only one) is for "standing order" purchases that have no individual purchase requisition.
- 2) Use a separate QAP-16 form for each procured item/service. Also, indicate a corresponding item number on the form and on the file folder label for easier retrieval from records and ELF. Currently only the project number is indicated.
- 3) Include Form QAP-16 on the "G" drive with other GED forms.

APPROVED:



DATE:

8/13/2007

DISTRIBUTION:

ORIGINAL—QA RECORDS

DIRECTORS, QA, Administration/Operations

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