

# GEOSCIENCES AND ENGINEERING DIVISION NONCONFORMANCE REPORT

Project No. NA

NCR No. 2007-30

## PART 1: DESCRIPTION OF NONCONFORMANCE

This NCR is being generated to address concerns identified in GED Surveillance Report 2007-18. Multiple issues are identified but all concern procurement documentation and are therefore being addressed together. It is suggested that all procurement packages currently retained as hard-copy QA records be reviewed and amended, as appropriate, not only to address the issues presented below but also additional recommendations given in the surveillance report.

Contrary to requirements of QAP-012, *Quality Assurance Records Control*, and QAP-016, *Procurement*:

- Receipt acknowledgment is not evident on some procurement packages.
- No line management validation of procurement records packages has been documented.
- Form QAP-016 is not complete on most packages.
- There are some instances of missing procurement plan acceptance.
- There are some instances of missing requisition form signatures.

Initiated by: M. Simpson Date: 8/9/07

Action Required by: R. Brient and selected GED managers and staff Response Due Date: 8/24/07

## PART 2: PROPOSED DISPOSITION AND CORRECTIVE ACTION

**Disposition:** When additional information is needed, procurement records prepared after January 2004 will be amended with additional information.

Note that the Director of QA validates procurement records packages for purchases charged to overhead because no line manager is responsible for overhead accounts.

### **Basis of Disposition:**

QAP-016 requirements for the types of records to be retained and responsibility for retention has changed significantly in the recent past. Requirements for procurement plans and use of Forms Manager for purchase documents came about with QAP-016 Revision 7 in January 2004. The identified deficiencies were not required by QAP-016 before revision 7, so the review and corrective action will be limited to the period after January 2004.

### **Action to Correct Nonconformance:**

Amend procurement records packages as needed.

Target date for completion: 9/28/2007

Proposed by: R. D. Brient

Date: 8/23/2007

**PART 3: APPROVAL**

Manager: *Al Burell*

Date: 8/24/2007

Director of QA: *M. Patrick*  
Comments/Instructions:

Date: 9/24/2007

**PART 4: CLOSE OUT** *See Attachment.*

Comments: *Discussed with QA Director -  
no additional comments.*

Distribution:  
Original-QA Records  
ORIGINATOR  
PRINCIPAL INVESTIGATOR *NA*  
MANAGER *NA*  
ASSISTANT DIRECTOR *NA*  
*Briant, Sager, Patrick*

Verified by: *M. Sager* Date: 9/12/07

Attachment to NCR 2007-30

Based on a detailed review of purchase documents initiated since 2004, responses to the specific deficiencies are provided.

1. Receipt acknowledgment is not evident on some procurement packages.

Some purchase requisitions were submitted to QA records after the requisition was issued but before the purchased items were received and accepted. Subsequent submittals to QA records provided the acceptance information. In two cases, acceptance information could not be located in QA records, so staff located the received items in the Laboratory and completed the acceptance (Fisher Lab Supplies Requisitions # 58590 and 53251). Since the latest revision of QAP-016, procurement documentation is being held for submittal to QA records by the requestor until acceptance is completed.

2. No line management validation of procurement records packages has been documented.

In many cases, laboratory supplies are purchased on overhead accounts because it is not known how the items will be used. In these cases, there is literally no line manager, so the Director of QA has validated the procurement records packages.

3. Form QAP-016 is not complete on most packages.

QAP-16 forms are completed for those procurement documents retained in QA records. Previous revisions required that procurement records be maintained by the financial clerk, so no QA records processing was involved. These records, while not maintained by QA, are captured in ELF and should be accessible through Forms Manager and SwRI Purchasing Department records.

4. There are some instances of missing procurement plan acceptance.

See response to item 2. Some procurement plans were submitted to QA records before acceptance. Review of ELF records from 2004 on indicated that subsequent submittals provided acceptance documentation on procurement plans. Since the latest revision of QAP-016, procurement documentation is being held for submittal to QA records by the requestor until acceptance is completed.

5. There are some instances of missing requisition form signatures.

Since Forms Manager has been in place, electronic signatures have been used, so no missing approvals would be expected. Fisher Lab Supplies Requisitions (which are still hardcopy) reviewed (from 2004 on) had a manager's approval. The copy of the requisition retained by the financial clerk may not be the version with all approvals (Purchasing Department's copy). No benefit would come from reconstructing approvals for requisitions prepared prior to Forms Manager, so no action will be taken.

*D. Bued*  
4/12/07