

NONCONFORMING CONDITIONS

1.0 Objective

The objective of this surveillance is to examine the effectiveness of the laboratory's implementation of programs to identify, analyze and correct conditions that are adverse to quality. Such conditions may include equipment that may not be able to perform its safety functions, procedures that contain errors, degradation of system or equipment performance, safety analyses with incorrect assumptions, designs that include errors or are incomplete, or materials that are different than those specified. The surveillance provides a basis for examining the effectiveness of existing laboratory programs and evaluating whether implementation of the programs complies with applicable DOE requirements.

2.0 References

- 2.1 DOE 5700.6C, *Quality Assurance*
- 2.2 10 CFR Part 50, Appendix B, *Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants*
- 2.3 10 CFR 830.120, *Quality Assurance Requirements for DOE Nuclear Facilities*
- 2.4 NQA-1-1989, *Quality Assurance Program Requirements for Nuclear Facilities*

3.0 Surveillance Activities

The Facility Representative or Environmental, Safety, and Health Support Specialist completes the following activities to perform this surveillance:

1. Select a nonconformance that has been identified and review its status.
2. Select a nonconformance that has been closed and verify the effectiveness of the closure process.
3. Interview personnel regarding the nonconformance program.

**Surveillance Guideline
NONCONFORMING CONDITIONS**

Surveillance No.: _____

Facility: _____

Date Completed: _____

YES NO N/A

Activity One - Review a Current Nonconformance Report

- | | | | | |
|----|--|-------|-------|-------|
| 1. | Is the nonconforming condition clearly identified so that personnel who encounter the nonconforming condition will immediately recognize it? | _____ | _____ | _____ |
| 2. | Is the nonconforming condition tracked in a log showing its status? | _____ | _____ | _____ |
| 3. | Was the nonconformance screened for reportability? | _____ | _____ | _____ |
| 4. | Have appropriate interim actions been taken to ensure protection of the health and safety of DOE's workers and the public pending final disposition of the nonconformance? | _____ | _____ | _____ |
| 5. | Is the nonconformance effectively controlled to prevent inadvertent use, testing, installation, or application? | _____ | _____ | _____ |
| 6. | Has the nonconformance been assigned to an individual or organization for disposition? | _____ | _____ | _____ |
| 7. | Has a schedule been established for final disposition of the nonconformance? | _____ | _____ | _____ |
| 8. | Is the schedule for final disposition of the nonconformance consistent with the risks and hazards associated with the nonconformance? | _____ | _____ | _____ |

Activity Two - Review Closure of a Nonconformance

- | | | | | |
|-----|--|-------|-------|-------|
| 9. | Was the disposition of the nonconformance appropriate? | _____ | _____ | _____ |
| 10. | Was the nonconformance screened for reportability? | _____ | _____ | _____ |

Surveillance Guideline NONCONFORMING CONDITIONS (cont.)				
		<u>YES</u>	<u>NO</u>	<u>N/A</u>
11.	Was the basis for dispositioning the nonconformance documented?	_____	_____	_____
12.	Was the nonconformance dispositioned by someone with the requisite technical competence?	_____	_____	_____
13.	Was the disposition of the nonconformance independently reviewed?	_____	_____	_____
14.	Has the laboratory established effective guidance on when a formal root cause analysis is required for nonconformances?	_____	_____	_____
15.	Was the root cause for the nonconformance identified? Has appropriate corrective action been initiated to preclude recurrence of the nonconformance?	_____	_____	_____
16.	Were all documents revised or appropriate change notices issued as necessary based on the disposition of the nonconformance before the nonconformance was closed?	_____	_____	_____
17.	Have all tags or other indications of the nonconformance been removed?	_____	_____	_____
18.	Was the person who identified the nonconforming condition notified of the disposition of the nonconformance?	_____	_____	_____
Activity Three - Interview Personnel (Select at least three individuals, each from a different organization within the facility.)				
19.	Do personnel understand their responsibilities regarding identifying nonconforming conditions?	_____	_____	_____
20.	Can personnel correctly explain the process they are expected to follow upon identifying a nonconforming condition?	_____	_____	_____
21.	Do personnel know to whom they are expected to report any conditions that could present an imminent danger to the workers or to the public?	_____	_____	_____

Surveillance Guideline
NONCONFORMING CONDITIONS (cont.)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
OTHER:			

NOTES/COMMENTS:

NONCONFORMANCES REVIEWED: _____

PERSONNEL CONTACTED: _____

Surveillance Guideline
NONCONFORMING CONDITIONS (cont.)

**IF MORE SPACE IS NEEDED FOR FINDINGS, OBSERVATIONS, AND FOLLOWUP
ITEMS - USE ADDITIONAL SHEETS**

FINDINGS:

Finding No.: _____

Description: _____

Finding No.: _____

Description: _____

Finding No.: _____

Description: _____

Surveillance Guideline
NONCONFORMING CONDITIONS (cont.)

OBSERVATIONS:

Observation No.: _____

Description: _____

Observation No.: _____

Description: _____

Observation No.: _____

Description: _____

Surveillance Guideline
NONCONFORMING CONDITIONS (cont.)

FOLLOWUP ITEMS:

Followup Item No.: _____

Description: _____

Followup Item No.: _____

Description: _____

Followup Item No.: _____

Description: _____

Surveillance Guideline
NONCONFORMING CONDITIONS (cont.)

LABORATORY MANAGEMENT DEBRIEFED AND RESULTS: _____

Signature: _____ Date: _____

Facility Representative or
Environmental, Safety, and Health Support Specialist