United States Department of Energy

Management and Overview Quality Assurance Program Plan

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Uranium Mill Tailings Remedial Action Project

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MANAGEMENT AND OVERVIEW

QUALITY ASSURANCE

PROGRAM PLAN

August, 1986

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MASTER

FOREWORD

This Management and Overview Quality Assurance Manual was revised effective July, 1986, in order to address more effectively the current requirements of the Uranium Mill Tailings Remedial Action Project Office.

UMTRA PROJECT MANAGEMENT AND OVERVIEW
QUALITY ASSURANCE PROGRAM PLAN

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INTRODUCTION

The Uranium Mill Tailings Remedial Action (UMTRA) Project Office (DOE/UMTRA-PO) is the U.S. Department of Energy (DOE) Albuquerque Operations Office (AL) organization charged with the responsibility of managing and coordinating the activities of the various participating organizations and support contractors working on the UMTRA Project. This Quality Assurance Program Plan (QAPP) describes how the DOE/UMTRA-PO, as assisted by the Technical Assistance Contractor (TAC), performs the quality assurance (QA) aspects of managing and coordinating UMTRA Project activities.

This QAPP was developed to comply with DOE Order 5700.6A, August, 1981, and AL Order 5700.6B, April, 1984, which contain the criteria applicable to Project QA activities. These activities are performed in accordance with the applicable portions of ANSI/ASME NQA-1-1979 w/Addendum (Ref. B) and 10 CFR 50 Appendix B (Ref. A).

PURPOSE AND SCOPE

This QAPP defines the QA program in effect for those activities of the UMTRA Project that are directly controlled by DOE/UMTRA-PO. It is intended to be used as a supplement to the UMTRA Project Quality Assurance Plan, UMTRA-DOE/AL 185.

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1.0 ORGANIZATION

This section describes the UMTRA Project QA functions, and delineates responsibilities. An organization chart is shown in Figure 1.1.

1.1 DOE/AL

DOE/AL has the ultimate responsibility for the UMTRA Project, including the quality assurance (QA) program. The UMTRA Project Office (DOE/UMTRA-PO) has been established within the DOE/AL organization for management of the Project.

1.2 DOE/UMTRA-PO

DOE/UMTRA-PO discharges its QA responsibilities in conjunction with the DOE/AL Director of the Quality Engineering (QE) Division, and with the assistance of the Technical Assistance Contractor (TAC). The DOE/UMTRA-PO Technical Support Group is responsible for the Project QA program which includes:

- o Preparing Project QA plans and procedures.
- o Administering the program and providing policy guidance to Project participants.
- o Reviewing and approving participant QA program plans (QAPPs), QA procedures, test procedures, and remedial action inspection plans (RAIPs).
- o Conducting audits of participant QA programs and site surveillance activities.
- o Verifying site design reviews.

1.3 TAC QUALITY ASSURANCE OVERVIEW

The QA overview functions performed for the Project are the responsibility of the TAC/Quality Assurance Department (TAC/QAD). The TAC/QAD is responsible to the DOE/UMTRA-PO Technical Support Group for performing various appraisals for verifying the quality of Project work. These consist of QA audits and QA in-process surveillances. The TAC/QAD is responsible for the coordination, scheduling, performing, reporting, and follow-up activities of these appraisals.

As part of this responsibility, the TAC/QAD prepares and maintains an audit/surveillance tracking system which covers the UMTRA Project Audit/Surveillance schedule on a yearly basis. The report, response, and closeout activities required are tracked for each appraisal. This tracking system is updated and distributed bi-annually or as required.

The TAC/QAD performs other QA-related activities as directed by the DOE/UMTRA-PO Technical Support Group.

FIGURE 1.1
UMTRA PROJECT
QUALITY ASSURANCE INTERFACE/ADMINISTRATION

1.4 INTERFACES

The QA program requires interfaces between the DOE/UMTRA-PO Technical Support Group Manager, the DOE/AL Director of the QE Division, the TAC QA Manager, and the participating organizations and support contractors as described herein.

The TAC QA Manager interfaces with the UMTRA Project QA Manager, the DOE/AL Director of the QE Division, and the Remedial Action Contractor (RAC) by memorandum correspondence, other communication, and through the distribution of controlled documents.

The DOE/UMTRA-PO interfaces with the various organizations working on the UMTRA Project by means of reports and meetings which are scheduled at the discretion of the appropriate UMTRA Project Office staff member. Progress, problems, status, and similar items are discussed. These discussions, reports, and meetings provide DOE/UMTRA-PO with the management review needed to evaluate and direct the Project activities.

QA audit and surveillance reports are generated by the TAC and sent to DOE/UMTRA-PO for distribution as shown on Figure 1.2. Responses to these reports are sent by the audited organization to DOE/UMTRA-PO for appraisal and closeout activities. The times scheduled for these transmittals are indicated on Figure 1.3.

**1. AUDIT/IN-PROCESS SURVEILLANCE OF UMTRA PRIME CONTRACTORS.
(MK-FERGUSON AND STATE OF UTAH)**

**3. AUDITS OF CONTRACTORS REPORTING ADMINISTRATIVELY (ORNL)
TO OTHER DOE OPERATIONS OFFICES**

* TRANSMITTAL LETTER REQUESTING IMPLEMENTATION OF AUDIT RECOMMENDATIONS
WITHIN 45 DAYS WILL BE SENT BY UMTRA PROJECT OFFICE.

**FIGURE 1.2
UMTRA PROJECT
QUALITY ASSURANCE REPORT DISTRIBUTION**

FIGURE 1.3
QA AUDIT REPORT TIME SCHEDULE

2.0 QUALITY ASSURANCE PROGRAM

2.1 REQUIREMENTS

The Project QA program complies with 10 CFR 50 Appendix B, DOE Order 5700.6A, August, 1981, AL Order 5700.6B, April, 1984, and is intended to meet ANSI/ASME NQA-1-1979 w/addendum requirements, as applicable.

2.2 SCOPE

QA activities performed by the DOE/UMTRA-PO and the TAC include, but are not limited to:

- o Overall program administration.
- o Decisions directing or redirecting site evaluation studies.
- o Auditing of the overall QA program by DOE/UMTRA-PO and DOE/AL QED.
- o Assuring the quality of services procured to support the Project.
- o In-process surveillances of site remedial activities.

The QA program for these activities uses existing procedures of DOE/AL, plus additional procedures developed specifically for UMTRA Project use by the TAC. A matrix containing a cross-reference of this QAPP with the applicable elements of 10 CFR 50 Appendix B, AL 5700.6B, April, 1984, and ANSI/ASME NQA-1 is shown as Table 2.1.

2.3 PROGRAM CONTROL AND ASSESSMENT

The UMTRA Project QA Manager assesses the status of the overall QA program through on-going management interactions with the TAC QA Manager. Representatives of participating organizations attend and participate in these meetings as required.

2.4 TRAINING

Training is conducted in orientation briefings that are held on a periodic or as-needed basis to acquaint DOE/UMTRA-PO and TAC personnel with the QA program defined herein. The TAC QA Manager schedules and conducts these briefings and maintains records of attendees.

2.5 SELECTIVE QA PROGRAM APPLICATION

The QA Program covers the 18 requirements outlined in 10 CFR 50, Appendix B. A quality-related activity in the UMTRA Project is not automatically covered by every quality requirement. A selective QA program application is made through the use of approved, prescribed procedures governing each quality-related activity. These procedures describe the extent of the QA program to be applied to that activity.

Table 2.1 UMTRA Project management and overview
quality assurance procedures

10 CFR 50, Appendix B criterion	Management and Overview QAPP section	Applicable NQA-1 sections	AL 5700.6B April, 1984, sections
I.	1	1, 1S-1, 1A-1	2
II.	2	2, 2S-1 (1), 2S-3 (2), 2A2	1
III.	3 (1)	3S-1 (3)	3 (a)
IV.	4	4, 4S-1, 4A-1 (4)	3 (b), 3 (g)
V.	5	5 (5)	3 (a) - 2 & 3
VI.	6	6, 6S-1	3 (i)
VII.	7	7 (6), 7S-1 (6)	3 (c)
VIII.	8		3 (d)
IX.	9		3 (g) 3
X.	10	10 (7), 10S-1 (7)	3 (e)
XI.	11		3 (h) 1
XII.	12		3 (h)
XIII.	13		3 (d)
XIV.	14		3 (h)-1, 3 (g)
XV.	15	15 (8), 15S-1	3 (f)
XVI.	16	16	3 (j)
XVII.	17 and Section 4	17, 17S-1 (9)	3 (k), 3 (i)
XVIII.	18	18, 18S-1, 18A-1	3 (1)

Table 2.1 UMTRA Project management and overview
quality assurance procedures (Concluded)

EXPLANATION OF NOTES IN MATRIX

Note #

1. Supplement 2S-1 is used to the extent that "inspection" is done on procured services of an inspectable nature (quantifiable characteristics). Inspection is performed by peers of the service being inspected. Formal training programs are used and a list of qualified inspectors maintained. Built-in controls require QA overview to assign individuals to inspection jobs.
 2. Supplement 2S-3, Sections 2.1 and 4.0 are not used. Section 3.3 is followed to the extent that experience is required to be a lead auditor, but there is no set requirement. In Section 6.2, only (a), (b), and (c), certification, are used.
 3. Limited to activities described in M&O-QAPP.
 4. Appendices 4A-1, 3a.c-k, and 3.2 are not applicable to activities covered by M&O-QAPP.
 5. Basic Requirement 5 is limited to procedures (Criterion V and Section 5.0).
 6. Applicable to procurement of services only (Criterion IV and Section 4.0).
 7. Applicable to services that are of an "inspectable" (quantifiable) nature (Criterion X and Section 10.0).
 8. Segregation aspects of Basic Requirement 15 and Supplement 15S-1 are not used due to the nature of the job. Other aspects of these requirements are addressed.
 9. Supplement 17-S-1 - There will not be a list of personnel with access to records (Section 5.0).
-

3.0 DESIGN CONTROL

3.1 SCOPE OF ACTIVITIES

Support studies and design work are contracted to other organizations by the DOE/UMTRA-PO. DOE/UMTRA-PO participates in independent design reviews conducted by the TAC.

DOE/UMTRA-PO and the TAC review documentation generated by participating organizations for programmatic, policy, and QA content. The documentation reviewed is determined by the Project Manager and includes, as a minimum, such documents as Environmental Impact Statements, Environmental Assessments, Radiological Survey Reports, Engineering Assessments, Health and Safety Audit Reports, Final Designs, Remedial Action Inspection Plans, Remedial Action Plans, Surveillance and Maintenance Plans, and Remedial Action Completion Reports.

3.2 TECHNICAL ASSISTANCE CONTRACTOR (TAC)

The TAC performs special technical studies to investigate general areas of programmatic impact that result in establishment of criteria or Project direction, or confirm results or conclusions of participating organizations. Scopes of work prepared by the TAC for subcontract applications define these special study activities. Approved procedures shall control review, approval, and changes to these scopes of work. Changes are subjected to the same review as the original document.

4.0 PROCUREMENT DOCUMENT CONTROL

The DOE/AL (Contracts and Industrial Relations Division), TAC Support Services Division, and Remedial Action Contractors (RAC) are responsible for providing material support in DOE/UMTRA-PO acquisition of materials and services for UMTRA Project operations. These activities are governed by Federal acquisition regulations, supplemented by DOE and contractor acquisition regulations.

These regulations provide controls for the origination of and revisions to procurement documents and the selection of suppliers and contractors. Statements of work, issuance of purchase requisitions, and change order documentation requirements are all governed by these regulations. Adequate control of purchasing activities is assured by audits conducted by DOE/UMTRA-PO and the TAC QA Division and reviews by the DOE/AL Contracts and Industrial Relations Division.

5.0 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

5.1 DOCUMENTED DESCRIPTIONS OF QUALITY ACTIVITIES

Documentation for accomplishing quality-related activities on the UMTRA Project is through formal, published procedures or instructions. Such documentation may include but not be limited to:

- o Management and Overview Quality Assurance Program Plan.
- o Contracts for materials and services.
- o Procedures.
- o Audit/Surveillance Program Plan (March, 1986).

5.2 COMPLIANCE WITH QUALITY DOCUMENTS

Documentation which provides evidence of compliance with quality-related requirements shall include, but not be limited to:

- o Data collection records.
- o Laboratory reports.
- o QA audit reports.
- o In-process surveillance reports.

6.0 DOCUMENT CONTROL

UMTRA Project documents are controlled through the project document control system which provides an active and continuing program for the acquisition, control, retention, retrieval, retirement, and disposition of all UMTRA Project documents. This system is defined in the UMTRA Project Document Control System Manual, UMTRA-DOE/AL 400424.000.

7.0 CONTROL OF PURCHASED MATERIALS, EQUIPMENT, AND SERVICES

DOE/UMTRA-PO has delegated the procurement of items and services purchased on behalf of the UMTRA Project to the participating organizations and Project contractors. The QAPPs of these groups shall define and reference written procedures for the methods of supplier evaluation, verification of supplier's conformance to specifications, and periodic surveillance of contractors.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of this QAPP requirement. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

8.0 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

Materials, parts, and components purchased for use on the UMTRA Project or furnished for use by the DOE shall be identified and controlled by the user organization. This shall include the identification and control of data. These items are the property of DOE. Their methods of identification and control shall be documented in the user organization's QAPP.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of this QAPP requirement. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

9.0 CONTROL OF SPECIAL PROCESSES

Special processes shall not be performed by DOE/UMTRA-PO. Special processes may be performed by participating organizations or support contractors and shall be controlled by their DOE-approved QAPPs.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of this QAPP requirement. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

10.0 INSPECTION

Inspection activities shall not normally be performed by DOE/UMTRA-PO. Procured services and hardware shall be inspected by participating organizations or support contractors per DOE-approved QAPPs. Inspection instructions shall be used to document acceptance criteria.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of this QAPP requirement. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

11.0 TEST CONTROL

No testing activities shall be performed by DOE/UMTRA-PO. Testing shall be performed and controlled by participating organizations or support contractors per their DOE-approved QAPPs. Test instructions shall be used to document acceptance criteria.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of this QAPP requirement. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

12.0 CONTROL OF MEASURING AND TEST EQUIPMENT

No activities requiring measuring or test equipment shall be directly performed by DOE/UMTRA-PO. All measuring and test equipment shall be under the control of participating organizations or support contractors per their DOE-approved QAPPs.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of this QAPP requirement. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

13.0 HANDLING, STORAGE, AND SHIPPING

Handling, storage, and shipping operations are the responsibility of participating organizations or support contractors in the UMTRA Project and shall be controlled by their DOE-approved QAPPs.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of this QAPP requirement. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

14.0 INSPECTION, TEST, AND OPERATING STATUS

Inspection, test, and operating status activities are the responsibility of participating organizations or support contractors in the UMTRA Project and shall be controlled by their DOE-approved QAPPs.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of these QAPP requirements. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

15.0 NONCONFORMANCES

Nonconformances are those deviations from plans, specifications, or procedures which cannot be corrected procedurally or which are direct violations of approved quality procedures.

Project participants and support contractors shall control nonconformances through procedures which describe methods for expeditious identification, documentation, segregation, review, and disposition as well as notification of affected organizations. The responsibility and authority for the disposition of nonconforming items shall be defined.

Modification, repair, rework, and replacement of nonconforming items shall require reinspection or retest to verify acceptability in accordance with the original plans and specifications.

The DOE/UMTRA-PO shall review nonconformance reports and approve corrective actions on nonconforming items, processes, and services which may affect the licensing of a site.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of this QAPP requirement. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

16.0 CORRECTIVE ACTION

Corrective action documented on Nonconformance Reports (NCRs) shall include necessary provisions to minimize the potential for recurrence of nonconformances. Necessary contractor corrective actions shall be coordinated through the purchasing organization for transmittal to the affected contractors. The DOE/UMTRA-PO QA Manager, TAC QA Manager, and appropriate purchasing organization representatives shall review contractor activities to verify proper implementation of the corrective action program.

DOE/UMTRA-PO shall ensure that periodic audits/in-process surveillances are conducted to verify implementation of this QAPP requirement. Surveillance teams may include representatives from DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel shall act as team leaders of these audit/surveillance teams.

17.0 QUALITY ASSURANCE RECORDS

QA records to be retained in the UMTRA Project Document Control Center (PDCC) shall include, but are not limited to:

- o Internal and external audit files and schedules.
- o Nonconformance reports/corrective action requests.
- o Surveillance reports.
- o Source evaluation reports.
- o Project QA manual.

QA records shall be filed in such a manner as to provide timely retrievability. Methods shall be established to identify records retention times and where records are to be stored.

18.0 AUDITS

DOE/UMTRA-PO ensures that audits are conducted to cover activities described in this QAPP. Audit teams may include representatives from the DOE/UMTRA-PO, DOE/AL staff, and TAC QA. Qualified DOE/UMTRA-PO or TAC QA personnel act as the lead auditors of these teams.

Audits of these activities are shown in the Project Audit/Surveillance schedule. Audit identification numbers are assigned and indicated on the audit/surveillance schedule.

Auditors are qualified by attending auditor training courses, knowledge of the UMTRA Project QA program, and knowledge of QA principles. Qualification as an auditor plus previous audit experience is required to qualify as a lead auditor. Personnel qualified as auditors are included on a list of auditors qualified for UMTRA Project audit participation. Personnel may also participate in audit teams as technical advisors.

Each audit is performed to an audit checklist developed by the lead auditor with input from audit team members. The audit checklist references the audit identification number. Procedures define the actions required to plan, conduct, and report an audit.

Audit findings are reviewed in a closeout meeting with the audited organization and an audit report is issued to the UMTRA Project Manager. The DOE/UMTRA-PO QA Manager reviews the audit findings and issues the audit report to the audited organization. The DOE/UMTRA-PO QA Manager reviews the corrective action proposed by the audited organization to ensure that audit findings are adequately addressed.

Follow-up action, including verification of corrective action, is taken when necessary. A re-audit may also be required if extensive action is necessary to correct audit findings.

BIBLIOGRAPHY

Code of Federal Regulations, Title 10, Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants."

American National Standards Institute Specification ANSI/ASME NQA-1-1979, "Quality Assurance Program Requirements for Nuclear Facilities."

GLOSSARY

The definitions of QA terms used in this Quality Assurance Program Plan shall be given in American National Standards Institute Specification ANSI/ASME NQA-1-1979, Supplement S-1 (Ref. B) with the following additions:

<u>AL</u>	Albuquerque Operations Office.
<u>Contractor</u>	Organizations under contract to provide services.
<u>DOE</u>	United States Department of Energy.
<u>P.O.</u>	Purchase Order.
<u>P.R.</u>	Purchase Requisition.
<u>Participating Organizations</u>	Those government agencies and national laboratories participating in UMTRA Project activities.
<u>Project Manager</u>	UMTRA Project Manager.
<u>QA</u>	Quality Assurance.
<u>Quality Assurance Program</u>	The planned systematic quality actions which assure that all activities of the Uranium Mill Tailings Remedial Action Project are accomplished per the QAPP to the required quality levels.
<u>Quality Assurance Program Plan (QAPP)</u>	The document that describes the quality criteria, practices, and procedures necessary to achieve the desired quality levels for the UMTRA Project.
<u>RAC</u>	Remedial Action Contractors (M-K Ferguson, State of Utah).
<u>Supplier</u>	Organization under contract to provide materials or components.
<u>Support Contractors</u>	The organizations directly under contract to DOE/AL.
<u>TAC</u>	Technical Assistance Contractor (Jacobs-Weston Team).
<u>TAC QA</u>	Technical Assistance Contractor Quality Assurance Overview (Jacobs-Weston Team).

UMTRA-PO

Uranium Mill Tailings Remedial Action
Project Office.

10 CFR 50-Appendix B

Code of Federal Regulations - Title 10
Part 50 - Appendix B.

UMTRA Project

Uranium Mill Tailings Remedial Action
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