



Rocky Mountain  
Remediation Services, L.L.C.  
... protecting the environment

---

QUALITY CONDITION REPORT

RMRS-QA-03.01

APPROVED: \_\_\_\_\_

*Juan U. Hdez D*  
\_\_\_\_\_  
Manager, Quality Assurance

2 Oct 96

Revision 0

October 2, 1996

Page 1 of 10

---

## 1. PURPOSE

The Quality Condition Report (QCR), procedure provides a means for RMRS to (a) report and improve processes or systems; (b) report and correct a process, activity, or system with a condition adverse to quality, or a significant condition adverse to quality.

## 2. SCOPE

This procedure applies to all RMRS employees, subcontractors and their facilities, projects, or programs. The QCR process complements in place processes such as Stop Work (1-V10-ADM-15.02, Stop Work Action), Occurrence Reporting (1-D97-ADM-16.01, Occurrence Reporting Process), Nonconformance Reports (1-65-ADM-15.01, Control of Nonconforming Items), or Commitments Management (1-PO4-CMCAP-16.00, Commitments Management and Corrective Action Program). However, the QCR may be used to initiate these other processes when an employee is unsure which process should be used.

## 3. GENERAL REQUIREMENTS

- 3.1 An operation, process, equipment, item or system which does not meet documented requirements or does not satisfy anticipated quality, shall be promptly identified, reported, analyzed, and improved or corrected.
- 3.2 All conditions adverse to quality and significant conditions adverse to quality shall be documented using the QCR process. The action to report a quality improvement, or self corrected deficient conditions will be documented using the QCR.
- 3.3 Responsible managers at all levels shall use the QCR to document the results of internal surveillance, inspections, or management assessments, (self-evaluations), audit, assessment findings received from the DOE, EPA, CDPHE, or contracted auditing service. External findings may be attached to a QCR to satisfy this requirement.

## 4. DEFINITIONS

- 4.1 Condition Adverse to Quality  
*The condition observed does not meet documented requirements. Conditions include failures, malfunctions, deficiencies, defects, incorrect actions, or similar nonconformances.*
- 4.2 Quality Improvement  
*The condition observed meets the requirements to perform work or process, or the item or equipment satisfies the requirements. However, the process, item, or equipment can be changed to Better the condition observed.*

**ADMIN RECORD**

SW-A -002761

1/10

#### 4.3 Price Anderson Amendments Act (PAAA)

*The codified federal statutes that deal with quality assurance requirements for nuclear facilities and nuclear activities. See 1-S27-ADM-02.08, Price Anderson Amendments Act Program for guidance concerning screening and reporting under PAAA.*

#### 4.4 Self Corrected Deficient Condition

*A deficient condition identified and corrected immediately by workers and management. Self corrected deficient conditions are credited as a continuous improvement items.*

#### 4.5 Significant Condition Adverse to Quality

*The condition if uncorrected, could have a serious negative effect on safety, operability, product, process, or the environment. See 1-PO4-CMCAP-16.00, Commitments Management Corrective Action Program for significance screening the QCR.*

### 5. RESPONSIBILITIES

All RMRS personnel shall meet the requirements of the QCR process and are encouraged to identify items or conditions adverse to quality. Management at all levels shall foster a "no-fault" attitude and encourage all personnel to participate in identifying conditions adverse to quality and suggesting improvements. RMRS employees shall at the time of discovery of adverse conditions, initiate the QCR process and (a) takes those steps necessary to prevent or mitigate injury or loss, (b) and notify the responsible supervisor or manager.

#### 5.1 Originator

The originator is a person who identifies an item or condition adverse to quality, or recognizes a need for corrective action or improvement. The originator is responsible for providing sufficient information about the condition as to allow for a prompt disposition. The originator is responsible for implementing a stop work due to safety concern.

#### 5.2 Quality Facilitator

The Quality Facilitator (QF) is any RMRS quality engineer. The QF is responsible for facilitating the preparation, disposition and closure of a QCR. The QF shall enter QCR data in the RMRS Quality Data System (QDS) and verify completeness and correctness of QCR documentation.

#### 5.3 Responsible Manager

The Responsible Manager (RM) has a salient understanding of the area, item or condition of concern. The responsible manager also has sufficient authority to achieve the needed actions to correct conditions adverse to quality and implement the requirements of the QCR process.

#### 5.4 Quality Condition Report Coordinator

The Quality Condition Report Coordinator (QCRC) is appointed by the QA manager to assure the proper control of all deficiencies, and quality improvements for RMRS. The QCRC will support the quality facilitator and responsible manager to make timely resolution of deficiencies and improvements. The QCRC is responsible for managing the QDS and provide timely reports to management.

## 6. INSTRUCTIONS

A QCR Hotline (966-4747) is available to assist RMRS personnel with the QCR process.

### 6.1 QCR Origination

#### Originator

1. Upon identification of a condition adverse to quality or need for improvement, complete the origination section of the QCR and forward the QCR to the quality facilitator. Instructions for the preparation of a QCR are on the back of the form.
2. If the originator corrects the deficient condition immediately, then document those actions according to section 6.5. Do not self correct a significant condition adverse to quality.

#### Quality Facilitator

3. Evaluate the condition and determine if there is a nonconformance to a documented requirement. If no requirement is identified the condition can be addressed as a quality improvement in section 6.2.
4. If a requirement has been identified for a deficient condition, then perform the screening process outlined in 1-PO4-CMCAP-16.00, Commitments Management and Corrective Action Program for significant conditions adverse to quality. Significance shall be based on Potential Consequence with no consideration for Probability because the condition has already happened. Process a condition adverse to quality according to section 6.3. Process a significant condition adverse to quality according to section 6.4. A significant condition adverse to quality has a screen value of 7 or greater based on Potential consequences.

### 6.2 Quality Improvement

#### Quality Facilitator

1. Enter the QCR in the Quality Data System as a Quality Improvement. Quality improvement actions do not require a significance screen.
2. Forward the QCR to the responsible manager with a response due within 14 days.

#### Responsible Manager

3. Contact the originator to discuss conditions and the recommended actions. Form a Quality Improvement Team (QIT), and develop suitable actions to achieve the improvement.
4. Document in the Action Party section the QCR those actions taken to achieve the established goal or improvement. Provide planned completion dates and actions taken. For a no action decision, provide written justification.
5. Implement the stated improvement, and forward the QCR with a response to the QF.

Quality Facilitator

7. When actions are complete, close the QCR. Send a copy of the completed QCR to originator.

6.3 Condition Adverse to Quality

Quality Facilitator

1. Enter the proper quality codes in the QDS (see Appendix 1 for deficiency codes). Forward the QCR to the responsible manager with a response due in 14 days.

Responsible Manager

2. If necessary, contact the originator to discuss conditions and the recommended actions. Identify the cause and record in the Action section.
3. Document in the Action Section the QCR a corrective action plan and the tasks needed to complete a corrective action. Tasks that are initiated under the work control system must identify the IWCP number, and the task manager for the IWCP. Provide planned completion dates. The responsible manager will have 14 days to respond to a QCR or request an extension for up to 30 days. An extension request must include written justification.

**Note**

*If a determination is made that the condition is not going to be corrected, a written dispensation to the requirement must be obtained from the applicable governing authority, e.g., DOE for DOE Orders, etc.*

4. Forward the QCR with a completed Action Party section to the QF.
5. Implement the stated corrective actions.

Quality Facilitator

6. Ensure the actions taken satisfy the approved corrective action plan.
7. The proper quality codes or cause codes should be verified and updated in the quality data system. Complete the close out block, then forward a copy of the QCR to the originator. (Refer to appendix 1 or 2 for deficiency codes and cause codes that apply to the QCR).

6.4 Significant Condition Adverse to Quality

Quality Facilitator

1. Contact the QA manager to determine if the significant condition adverse to quality will be subject to Stop Work Action and proceed accordingly.
2. The quality facilitator will prepare documentation to enter the condition in the PATS system and provide the responsible manager the assigned tracking number.

Responsible Manager

3. Review the reported condition and take actions to prevent or mitigate injuries or losses. If the condition is determined to be a reportable occurrence, stop the QCR process and refer to Occurrence Reporting (1-D97-ADM-16.01, Occurrence Reporting Process).
4. The manager reviews conditions for Price Anderson Amendments Act reportability in accordance with 1-S27-ADM-02.08 PAAA Issue Screening Transmittal Form.
5. Perform root cause analysis.
6. Document in the Action Section the QCR a formal corrective action plan and the tasks needed to complete a corrective action. Task that are initiated under the work control system must identify the IWCP number, and the task manager for the IWCP. Provide planned completion dates.
7. Obtain quality assurance review and concurrence on the corrective action plan and supporting documentation.
8. Forward the QCR with a completed Action Party section to the QF. The responsible manager will have 14 days to respond to a QCR or request an extension for up to 30 days. An extension request must include written justification.
9. Implement the stated corrective actions.

Quality Facilitator

10. Forward the corrective action plan to the PATS coordinator for DOE tracking. Be sure to include task managers and schedules for completion.
11. When all tasks are complete and the actions taken satisfy the approved corrective action plan, complete the close out section, then forward a copy of the QCR to the originator.

6.5 Self Corrected Deficient Condition

Originator

1. Use the QCR to describe the condition noted, nonconforming requirement, and actions taken to correct it.
2. Sign, date, and submit the QCR to the QF.

Quality Facilitator

3. Enter the QA and cause codes on the QCR. Provide a copy of the QCR to the originator.

**7.0 RECORDS**

The Quality Condition Report, (Example shown in Appendix 3) is a quality assurance record. Quality records are handled in accordance with the RMRS Records Program.

**APPENDIX 1**  
**QUALITY CONDITIONS**  
Based on DOE Criteria

The Quality Support person or qualified originator may review the Quality Condition Table and select the item that meets the description of finding. Write the statement in the quality condition field and enter the code number in the quality code block.

Criterion	Code	Quality Conditions List
1. Quality Program	1.1	The organization has no formal Quality Assurance Program.
	1.2	The organization lacks structure, responsibilities, authorities, and lines of communication.
	1.3	The organization lacks a system for planning, scheduling, and assessing quality of work.
2. Personnel	2.1	Personnel are not trained/qualified to perform assigned work or required to maintain proficiency.
	2.2	Training refresher or update is not scheduled or provided by Organization.
	2.3	Organization does not implement/maintain training and qualification records.
3. Quality Improvement	3.1	Organization has not developed or implemented an effective self-evaluation continuous improvement program.
	3.2	Organization does not have methods to identify, segregate, and provide corrective action or recurrence control.
	3.3	Organization does not have or use a formal data system for quality related problems.
4. Documents & Records	4.1	Document not prepared, controlled, or issued properly.
	4.2	Record not identified as quality record or administrative record.
	4.3	Record not prepared or submitted for record storage, or have an adequate storage facility.
5. Work Processes	5.1	Work plans, parameters or controls are not identified or used.
	5.2	Procedures do not comply with codes and standards.
	5.3	Process/equipment nor formally qualified or tested before use.
	5.4	Out of Control equipment not disabled or corrected by operator.
	5.5	Process or Equipment not operated by qualified personnel.
6. Design Control	6.1	Requirements/Quality standards not written into Specifications, Drawings etc.
	6.2	Unauthorized deviation from specifications, or standards.
	6.3	Changes are not managed, approved or meet original design requirements.
	6.4	Identification & control of design review or interface not done.
	6.5	Design implemented before verification & validation by independent.
7. Procurement	7.1	QA requirements, specifications, not identified in statement of work.
	7.2	QA requirements, specifications not identified for item purchased.
	7.3	Supplier does not have required QA Program.
	7.4	Purchaser does not assure adequate product or service.
	7.5	Quality of delivered product/service not evaluated or verified.
	7.6	Evidence not retained to show compliance.

**APPENDIX 1 (continued)**

**QUALITY CONDITIONS**

Based on DOE Criteria

Criterion	Code	Quality Conditions List
8. Inspection	8.1	Activity not inspected to verify conformance.
	8.2	Inspection hold points not identified or used.
	8.3	Inspection method not identified, not followed, or inadequate.
	8.4	Inspection results not documented.
	8.5	Identity and control of rejected item not maintained.
	8.6	Inspection or Test Equipment not properly maintained, calibrated, or documented.
9 Management Assessment	9.1	Management has not planned, or scheduled periodic assessment of Quality program.
	9.2	Management did not identify problems that hinder objectives.
10. Independent Assessment	10.1	Management has not planned and implemented periodic independent assessments.
	10.2	Management did not use a technically knowledgeable and qualified assessor.

**APPENDIX 2**  
**CAUSE ANALYSIS WORK SHEET**  
 To be used for all RMRS Cause Analysis

Cause Category	Code	Cause Code List
001 Equipment	1	Defective or failed part, material, equipment, hardware, software.
	2	Installation or maintenance incorrect.
	3	Wrong tool fixture used or substituted.
	4	Equipment in service beyond work cycle, life cycle expectation.
002 Communication	1	The correct terminology, or vocal repeat was not used.
	2	Conflicting verbal instruction or message.
	3	Labels, Signs, Written instruction unclear.
	4	Written or verbal instruction was not timely.
003 Management System	1	Procedure not provided or available.
	2	Preparation, review or management involvement not adequate.
	3	No corrective action system.
	4	Safety quality review at shift turnover inadequate.
004 Personnel	1	Human error.
	2	Not following procedure.
	3	Not capable or qualified to perform activity.
005 Procedure	1	Written procedure not available, inadequate, or difficult to use.
	2	Wrong revision.
	3	Parameters/facts wrong.
006 Training	1	Training not available.
	2	Infrequent task had no walkdown or PRE-EV.
	3	Experience or OJT inadequate.
	4	routine activity changed without refresher or training update.
007 Work Environment	1	Poor lighting or ventilation.
	2	Work are access, clearance, or usability.
	3	Repetitive or strenuous task.
	4	Does not meet OSHA requirements.

APPENDIX 3
Quality Condition Report
Use for all RMRS Deficiencies

QUALITY CONDITION REPORT
Report No.
Page of
Issue date
Response Due By
ORIGINATOR
1 Date
2 Bldg /Room
3 Originator Print/Sign
4 Responsible Manager
5 Org. code
6 Group Name
6 Requirement
7 QCR condition
QA ANALYSIS
8 Review Required
9 Reviewer, Print Sign & Date
10 PATS Yes No
NO Risk total
11 Significant Condition PAAA Screen
ACTION PARTY
12 CAUSE: If the QCR is a Significant Condition Adverse to Quality the Action Party must perform Root Cause Analysis.
13 Corrective Action : Identify each task . If the C/A uses IWCP , enter IWCP no. here and IWCP task manager below
14 Responsible Manager: Org:
Enter planned Completion Date: Signature: Date:
15 Verification/Closout Status: Est. Savings Cost:
Verifier's Name: Signature: Date:
16 Remarks
17 Quality code: Deficiency: Cause Code: Continued on Page 2

9

**APPENDIX 3****QCR Instruction Page** for RMRS-QA-03.01, Quality Condition Reports Rev. 0.*COMPLETE THE ORIGINATOR SECTION: Steps 1 through 7.*

- 1 Enter the Date the deficient condition is first observed.
- 2 Enter the specific building location and room number.
- 3 The originator print name and signs the QCR.
- 4 Enter the name of the responsible manager and managers Organization number if known.
- 5 Enter the responsible manager's Group Name.
- 6 Enter the requirement: Include procedure number, technical specification, deliverable, etc.
- 7 Clearly state the condition observed. Additional text can be written on plain paper labeled CONDITION.

*COMPLETE QA ANALYSIS: Steps 8 through 10*

- 8 Identify who reviews/approves the QCR. A significant condition adverse to quality must be reviewed and approved by the QA manager.
- 9 Enter the reviewer's name, sign and date.
- 10 Perform the Risk Screen using 1-PO4-CMCAP-16.00. The QCR risk screen will ignore the probability factor because the condition has already happened. A risk total higher than 7 is a significant condition adverse to quality. Enter a PATS number obtained from a PATS coordinator.

**NOTE**

*The Quality Facilitator will issue a QCR with a Response Due Date. If the responding manager cannot meet this schedule, an extension may be requested. The corrective action coordinator will review the request and extend the response up to 30 days.*

*COMPLETE ACTION PARTY: Steps 11 through 14*

- 11 Any significant condition adverse to quality requires a PAAA screening in accordance with 1-S27-ADM-02.08 PAAA Program instruction for Potential Price-Anderson Issue Screening Transmittal Form.
- 12 Describe the cause in this field.
- 13 Enter the corrective action. Prepare a corrective action plan with sufficient detail to preclude recurrence of the noted condition. Multiple tasks must be listed separately with and task manager and IWCP numbers.
- 14 Enter the responsible manager as above. Enter the planned completion date, and sign and date the QCR when the corrective action is initiated.

*CLOSEOUT: Steps 15 & 16*

- 15 Review corrective actions and verify that task completion addresses the condition on the QCR. Sign the closeout and enter the date corrective action was verified.
- 16 The comments section can include various information about the final status of the QCR. Information can describe additional action to be taken, tests made to verify compliance, or different conditions that have resulted from this corrective action.

*TRENDING: Step 17*

- 17 Trend codes will be entered that relate to the deficiency, cause, and QA requirements.

10/10