



Rocky Mountain  
Remediation Services, LLC  
*protecting the environment*

## PROCEDURE

CORRECTIVE ACTION

RMRS-QA-03 01

APPROVED

  
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Manager Quality Assurance

Revision 3  
Effective January 11 1999  
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### 1 PURPOSE

The RMRS Corrective Action Process (CAP) establishes requirements and methods to implement the Site Corrective Action Process (3-X31-CAP-01), and integrates other corrective action documents including Cause Analysis, Lessons Learned and Generic Implications Price Anderson Amendments Act Program and Data Analysis and Trending for Performance Improvement

### 2 SCOPE

This procedure applies to all RMRS employees, subcontractors and their facilities, projects or programs. The CAP shall be used to identify and track deficiencies in the Plant Action Tracking System (PATS). This procedure is used to identify a deficiency when performing any planned inspection, surveillance, independent assessment, management assessment, job walk down, or unplanned discovery. Other procedures that identify deficiencies include, Occurrence Reporting Process (1-D97-ADM-16 01), Control of Nonconforming Items (1-65-ADM-15 01, NCR) or Radiological Improvement Report (1-H02-HSP-03 02, RDR). It is noted that occurrence reporting and radiological deficiencies have stand alone tracking systems. Any instance where these reports will be tracked in PATS, the deficiency identified by these systems shall be corrected in this procedure.

### 3 OVERVIEW

The RMRS corrective action program fully utilizes the site infrastructure but retains internal checks and balances to meet company and client needs. A process flow sheet of the RMRS Corrective Action Process is presented in Appendix 1. Each deficiency will be documented as a CAP (for actions, processes, systems or programs) or NCR (for materials, items, or equipment) that does not meet specifications. The deficiency will be validated by a Quality Engineer (QE) and screened for Price-Anderson applicability by a Responsible Manager (RM) before entry in PATS by the Corrective Action Point of Contact (CAPOC) or alternate. It is the responsibility of the RM to address the deficiency, and close out the applicable actions on or before the stated commitment dates. The RM obtains QE support for corrective action development and identifies the closure criteria and deliverables before corrective action begins. The QE assures that deficiency characterization, significance screening and Price Anderson reviews are submitted with the corrective action plan. RMRS QA performs 100% verification of all deficiencies with PAAA implications and those with a High significance. Other deficiencies may be verified by QA as part of a surveillance program, or at the request of operations management. These checks and balances will assure that RMRS has a reliable and controlled corrective action process with accurate information reported to management.

## 4.2 Functional Titles & Responsibilities

The positions listed are designated as functional titles and describe functional responsibility rather than organizational position titles

### Corrective Action Coordinator (CAC)

Supports management with the corrective action process. The CAC may support various managers within a project to assure effective implementation of this procedure. The CAC will meet the training requirements of 3-X31-CAP-001

### Corrective Action Point of Contact (CAPOC) and Alternate

Administers and maintains all deficiencies for RMRS in the PATS database. The CAPOC will provide reports to management on corrective action performance and schedule compliance. The CAPOC will track and report various performance indices and trends for RMRS

### Identifier/Originator

Prepares the deficiency identification (CAP) according to this procedure, identifies the responsible manager and provides concurrence as required by 3-X31-CAP-001

### Responsible Manager (RM)

Has responsibility for implementing corrective actions. The RM can be identified as a Plan Manager or a Task Manager, or both as for this procedure and the corrective action process. The RM will assure that all deficiencies are evaluated for Generic implications, Price-Anderson applicability, Class Cause, Significance, and corrective action task deliverables that address the deficiency. The RM will coordinate the validation of each identified deficiency

### Subject Matter Expert (SME)

Supports the RM to assure that corrective actions satisfy the area of concern. The SME may support an area of Health & Safety, Quality, Radiation Safety, Occurrences, and Compliance

### Price-Anderson Point-of-Contact

Supports the corrective action process by tracking and supporting the final disposition of all PAAA related documents and ensuring that associated records are captured and maintained in accordance with the RMRS Records Procedures

### Quality Engineer (QE)

Supports the RM to validate deficiencies and assures that corrective actions address the cause of the deficiency. The QE is a facilitator in the corrective action process and will coordinate with the RM to assure each deficiency is evaluated for Generic implications, Price-Anderson applicability, Class Cause, Significance, and corrective action task deliverables that address the deficiency. The QE will assure closure review for all PAAA related and High significance deficiencies by an independent verification of closure documentation

## 5 INSTRUCTIONS

Activities performed with this procedure add instructions not listed in 3-X31-CAP-001, and shall be followed in the sequence that are identified herein. The RMRS process does not exclude any requirement of 3-X31-CAP-001

### 5.3 Corrective Action RM, QE

The Responsible Manager (RM) can be identified in PATS as a Plan Manager or a Task Manager and has salient knowledge of the deficiency, with sufficient authority to achieve the needed actions to correct deficiencies and implement the requirements of the CAP. See section 6 for Price Anderson related issues. Complete these tasks in conjunction with section 5.2, following the sequence prescribed.

- a Prepare a corrective action plan that details tasks with tangible deliverables and closure criteria. The RM's coordinator can provide pre-printed forms that can be used for plan and task development. Deliverables will be based on objective evidence that is traceable, retrievable and documented in PATS. For all Price Anderson and high significance deficiencies, the RM will ensure that objective evidence exists prior to verification by the QE. Prepare formal Root Cause as determined by significance.
- b When a corrective action is complete, prepare a status revision/completion to close an action. Submit the form with objective evidence of completion to QE for verification and transmittal to the CAPOC.
- c Prepare extensions, revisions or responsible manager changes according to section 5.6.

Note: Prepare extensions, revisions or other changes according to section 5.6. The RM should include a substantial contingency to accommodate closure and verification activities not identified in the corrective action plan. RMRS supports site tracking and reporting actions at the end of each month. To assure compliance to site tracking requirements and accurate data validation, corrective action plans and tasks may not be entered within the last three days of the month or the first three days of the ensuing month. Be sure that Due Dates do not fall within these limits.

### 5.4 Closure RM, QE, SME, CAPOC

The QE shall at the time of closure, assure that PAAA related issues and those deficiencies with a high significance have the completed Cause Analysis and PAAA reporting.

- a The RM will submit closure documentation to a support QE/SME for verification of high significance or PAAA related deficiencies or transfer to the CAPOC.
- b The QE/SME will perform an independent verification of completed actions to assure that closure criteria and deliverables have been met.
- c Sign the closure form and submit the closure document to the CAPOC.
- d The CAPOC will review closure documentation for significance adequacy and PAAA relevance. If it is determined that independent verification is required, the CAPOC will enter the action as complete and forward a copy of the documents to an SME for verification steps b & c.

### 5.5 Data Management CAPOC

The CAPOC and alternate perform the following actions:

- a Assure that all deficiencies are adequately identified and characterized before entry in PATS.
- b Validate and control all records submitted as quality records.
- c Maintain an active record file for open deficiencies in a one-hour fire rated file cabinet.
- d Review the tracking system to assure that deficiencies identified by a process not controlled by

6.3 Occurrence Reports

Any Occurrence Report that is submitted to the PATS shall be reported on the CAP and follow this procedure to closure

7 **RECORDS**

The following documents are quality assurance records and will be maintained for 5 years. Quality records are handled in accordance with the RMRS Records Identification, Generation and Transmittal RM-06 02

- The CAP/NCR or other deficiency identification form
- The Corrective Action Planning Documents
- Root Cause Analysis
- Status Revision Forms or related document
- Closure Form or related document

The RMRS record center is responsible for retention and formal storage of RMRS documents. Those documents transmitted as quality records for the CAP will be scanned and forwarded to the Plant Action Tracking Records