



Rocky Mountain
Remediation Services L L C
protecting the environment

PROCEDURE

PREPARATION AND CONTROL OF RMRS DOCUMENTS

QA 05 01

Revision 0

Date Effective 02/19/97

APPROVED

[Signature]
Sr Vice President Administration

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10/9/30/98
J Hotz

1 0 PURPOSE

This document provides direction for the preparation revision and issuance of RMRS policies directives manuals procedures instructions and job-aids RMRS documents are intended to

- Easy to use
- Easy to change and revise
- Written to the skill of the user
- Free of unnecessary requirements

The process control implemented by this procedure is depicted in Appendix 1 Document Process Flow Diagram

This procedure implements portions of DOE Order 5700 6C Quality Assurance 10 CFR 830 120 Quality Assurance Requirements 1 MAN 001 SDRM Site Documents Requirement Manual and Sections 6 1 4 6 4 6 5 and 6 5 2 of the RMRS Quality Assurance Program Description (RMRS QAPD 001)

2 SCOPE

This document applies to RMRS personnel involved in the preparation/use of RMRS documents for quality affecting activities or processes This procedure only applies to documents being developed for use within RMRS or RMRS subcontracted services Documents with Site applicable requirements and direction shall be prepared revised and issued in accordance with the provisions of 1 MAN 001 SDRM Site Documents Requirement Manual It is at the responsible manager's discretion to determine the type of document needed The extent of detail and prescriptiveness in RMRS documents is contingent on

- The operations or activities relative importance to safety safeguards and security
- The magnitude of any hazard involved in conducting the operation or activity
- The life cycle stage of a facility or activity
- The programmatic mission of a facility or activity
- Particular characteristics of a facility or activity
- Any other relevant factors specifically to include the competence of the individuals performing the activity

This procedure does not apply to correspondence or documents developed by organizations outside of RMRS This procedure does not apply to plans or reports and other documents not identified above which are developed revised reviewed approved and issued at the manager's discretion unless other controls apply

3 DEFINITIONS

Note Definitions provided herein are specific to this procedure. All other unique terms may be located in the Quality Assurance Glossary of Terms, found in the Site Quality Assurance Manual or in the SDRM Glossary of Terms.

Directive RMRS directives are used as methods of passing on programmatic or administrative direction where other documents are not in existence to control the practices involved.

Document History File (DHF) Documents that evidence the development, review, concurrence approval, revision and control of a document. The history file includes the drafts submitted for review, correspondence documenting reviews, justification for revision(s) to the document, any verification and validation documentation, the completed parallel review comment resolution documentation, Form 06 01 A3 Controlled Document Release, an electronic copy of the document, and the Controlled Document Checklist.

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Document with Site Applicable Requirements Site applicability includes programs or requirements that RFETS employees must follow regardless of company affiliation. The programs may be owned by sub-contractors but are approved by K. H. (Approved Site-applicable documents, developed by RMRS are forwarded to RMRS Document Control for submittal to Site Document Control.)

General Comment Comments designated by a reviewer based on the reviewer's knowledge or area of expertise and identified by a (G) on the Review Comment Sheet. General comments reflect the reviewer's opinion and do not indicate a violation of technical or administrative Orders, laws, etc. General comments will be considered and incorporated as deemed appropriate by the author of the document. General comments do not require concurrence from the comment originator.

Instruction RMRS instructions provide direction to perform a simple task or activity that, if performed incorrectly, will have minimal consequences.

Job-Aid RMRS job-aids provide useful information as a reminder for the performance of a task. For example, it could be drawings, tags, graphs, or charts. Job-aids should not be used in place of a procedure when a procedure is warranted, should not conflict with or supersede approved procedural instructions, and should not cover subject matter that would address safety envelopes, radioactive and hazardous materials, maintenance, operating procedures, test procedures, surveillance procedures, analytical procedures, emergency responses, VSS equipment, OSRs or TSRs. Job-aids are developed at the discretion of the responsible manager and are not included in the RMRS Document Control process.

Mandatory Comments Comments identified by an (M) on the Review Comment Sheet. Valid mandatory comments must be dispositioned and concurred with by the reviewer's organization. Comments listed by the reviewer as mandatory that do not meet the following criteria may be downgraded to general (G). Mandatory comments by a reviewer must include the following supporting documentation:

- Technical information that is necessary to meet the mission needs of the reviewer's organization
- Requirements source documents shall be identified (for example, Occupational Safety and Health Administration [OSHA] 29 CFR 1910 Policy Manual, or program documents)
- Justification for mandatory comment (for example, Justification: technical inaccuracy)

Mandatory comments can be downgraded to General if the above requirements are not met. The Responsible Manager has final decision on comment resolution.

Manual RMRS manuals define the necessary and sufficient programmatic requirements needed to implement a program.

Policy RMRS policies are written core value statements signed by from the RMRS President to all employees to express senior management s expectations for conducting business at RFETS

Procedure RMRS procedures are a written documents that set forth the responsibilities and methodologies for performing a process with complex steps and/or a moderate to high potential risk hazard and/or consequence A procedure may contain written instructions to conduct operations evolutions tests or to respond to abnormal or emergency situations or annunciators or alarms for alarm panels Administrative procedures describe the actions and responsibilities for performing activities that establish management and programmatic controls for RMRS Technical procedures describe the actions and responsibilities for performing activities that include but are not limited to production operation surveillance of equipment and facilities and maintenance

Responsible Manager (RM). This is a functional description used to represent the manager who is responsible for developing documents

Verification and Validation (V&V). A process whereby a technical procedure is tested to ensure sufficient detail exists to support adequate consistent, and effective completion of the task described in the procedure

4 RESPONSIBILITIES

4.1 Responsible Manager (includes designees or document originators)

- Appoint knowledgeable personnel to develop documents for activities and processes
- Ensure appointed personnel are aware of and understand the requirements of this procedure
- Ensure that affected organizations are included in the review of documents including ESH&Q and any applicable Site safety committees or boards
- Approve documents developed within their organization

4.3 Functional Managers

- Are accountable for the safety and quality of activities performed in accordance with documents
- Participate in the review of documents
- Ensure personnel attend training as required

4.4 Compliance

- Assist responsible managers in developing revising reviewing and controlling documents
- Prior to approval review documents as requested to ensure that applicable laws regulations and orders have been incorporated

4.5 ESH&Q

- Prior to approval review all documents to ensure that appropriate health safety and quality controls have been incorporated
- Provide training for documents as requested by the RM

4.6 RMRS Document Control

- Assign log and track RMRS document numbers (controlled and uncontrolled)
- Issue RMRS controlled documents
- Maintain the master document and DHF for the current revision
- Issue and transmit the master document and DHF of previous revisions to the RMRS Records Center

4 6 Personnel (Document Users)

- Are responsible for the quality and safety of activities they perform
- Use documents as prescribed, and inform management of any deficiencies identified within a document
- Propose new documents, or changes, to management for consideration
- Fulfill role as document originator and/or perform activities identified in this document as assigned by management.

5 **INSTRUCTIONS**

The process control implemented by this procedure is depicted in Appendix 1 Document Process Flow Diagram.

5 1 Define Applicability

- [1] The RM determines if the document to be developed has Site-applicability. If the document is Site applicable the RM develops or revises the document in accordance with the provisions of the SDRM
- [2] The RM submits approved Site applicable documents to RMRS Document Control including completed forms required by 1-77000-DC-001 Document Control Program

5 2 Establish Document Type

- [1] The RM, using Table 1 determines the type of document to be produced.

5 3 Develop Document

5 3 1 Initiate Document History File

- [1] The RM shall initiate the Controlled Document Checklist from RMRS procedure Document Control Program DC-01. The checklist will be maintained by the RM or designee for the duration of the document development and review, until such time that the document is transmitted with the Document History File (DHF) to Document Control.

5 3 2 Develop Draft/Revision

- [1] The RM shall ensure that the provisions of this procedure are met and that all applicable laws, regulations, orders, and requirements are addressed appropriately. Documents must meet the records acceptance criteria defined in 1-V41-RM-001 Records Management Guidance for Records Sources (Section 6.3)
- [2] The RM should consider contacting the appropriate support organization with expertise in the area of concern for assistance in preparation of documents (i.e. Safety Quality Assurance Nuclear Safety Environmental Restoration etc.)
- [3] The RM shall ensure that a unique identification number is assigned to each document. Numbers are assigned by RMRS Document Control in accordance with the provisions of DC 01 Document Control Program

5 3 2 1 Policies, Directives, and Job-Aids

- [1] The RM shall format RMRS policies, directives, and job-aids in accordance with Appendix 2
- [2] The RM should utilize the definition section of this procedure for determining the scope and content of policies, directives, and job-aids. The SDRM may also be considered for determining appropriate content and scope
- [3] When developing job-aids the RM should consider the guidance provided in 1 31000-COOP-010 Control of Operator Aids

5 3 2 2 Manuals, Procedures, and Instructions

- [1] The RM shall format RMRS manuals, procedures, and instructions in accordance with Appendix 3

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[2] The RM should utilize the definition section of this procedure for determining the scope and content of manuals procedures and instructions The SDRM may also be considered for determining appropriate content and scope

[3] The RM shall ensure that documents identify the forms and documents resulting from the implementation of the document as a Quality Assurance (QA) a Non QA record and/or a CERCLA Administrative Record

Guidance on establishing the categories are provided in 1 V41 RM 001 Records Management Guidance for Records Sources 2 G18 ER ADM 17 01 Records Capture and Transmittal 2 N96 ER ADM 17 09 Records Identification Preliminary Preparation and Creation Retention duration location and final disposition requirements must also be described in the records section of the procedure

[4]The originator should have the document reviewed by peers prior to submitting to the manager for approval or before distributing for review by other groups within RMRS

All reviews should be documented and include comments comment resolution and comment resolution concurrence

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5 4 Review

5 4 1 *Identification*

[1] The RM shall identify RMRS organizations affected by the document Organizations affected include those who use the document, supply a material service or data in accordance with the document, or receive a service product, or data in accordance with the document

[2] All documents will be submitted to the ESH&Q and Compliance organization for review and comment resolution prior to approval

[3] All documents developed to implement site applicable requirements must be reviewed and concurred with by the cognizant K H Oversight organization

5 4 2 *Assemble Package*

[1] The RM shall assemble a review package consisting of the document, in draft form a review and comment sheet, and related continuation page (Ref SDRM Appendix 2) and correspondence transmitting the document for review The transmittal correspondence shall include as a minimum distribution to affected organizations a description of the change or drivers initiating a need for the document, a due date for reviewers to submit comments a statement concerning disposition of comments received after the due date and a definition of comment types (Ref Appendix 4)

5 4 3 *Transmit for Review*

[1] The RM shall transmit the review package to the affected organizations and when possible allow two weeks for mail delivery review and return of comments

5 4 4 *Review and Comment*

[1] The affected organization will distribute the document as deemed appropriate to provide for review and comment To prevent extraneous comment resolution when possible reviews should be limited to essential individuals involved in the process or activity covered by the document When possible comments should not be provided on the borders or margins of the document Comments received on borders or margins will be considered as general comments To ensure comments are considered every effort shall be made to meet the comment due date Comments received after the due date and not resolved shall not preclude reviewing organizations from concurring with the document Late comments will be resolved during the next scheduled revision

5 5 Comment Resolution

5 5 1 *Comment Disposition/Concurrence*

[1] The RM will incorporate comments as appropriate and comment review forms will be retained in the DHF Concurrence will be obtained for the resolution of mandatory comments

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Table 1
RMRS DOCUMENT HIERARCHY

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Document	Purpose	Applicability	Review/ Concurrence	Approval
Policy	Convey Senior management s expectations for the Site regarding values, principles, philosophies, goals, standards, or accepted practices	RMRS employees and subcontractors	RMRS impacted Sr Vice Presidents	RMRS President
Directive	Provide direction and/or responsibilities for controlling programmatic practices or activities within a department or group	RMRS employees and subcontractors	RMRS impacted Vice Presidents and Managers	RMRS Sr Vice President responsible for the program
Manual	Incorporate the necessary and sufficient programmatic requirements needed to define and implement that program (not how to implement)	RMRS employees and subcontractors	RMRS impacted Vice Presidents and Managers	RMRS Sr Vice President responsible for the associated task or activity
Procedure (Typically placed in a binder)	Provide detailed steps and necessary information for performing a test or activity in a consistent and safe manner Should be used while conducting activity	Any person who performs or has responsibilities within the associated task or activity	Impacted RMRS Vice President, Director, Manager & impacted subcontractors or designee	Company wide or cross-cutting organizations RMRS President/ Vice President/ Manager responsible for the associated task or activity <u>activity</u> Bldg./Program Specific Bldg./Program Manager
Instruction*	Provide instructions to perform a simple task or activity that, if performed incorrectly, will have minimal consequences Should be used while conducting activity	Any person needing the assistance of the instruction to perform the task or activity	Impacted RMRS Vice Presidents & impacted subcontractors or designee	RMRS Manager/Supervisor Forman responsible for the associated task or activity
Job Aid* (Not controlled by Document Control)	Provide visual information as a reminder for the performance of a task (e g., drawings, tags, graphs, or charts)	Any person desiring the assistance of the job aid to perform the task or activity	RMRS impacted user's Manager for the activity or task	At the discretion of the RMRS Manager responsible for the activity or task

With the exception of Job Aids, the above documents shall be controlled under RMRS Document Control in Building 116, X5430

*Not part of the Authorization Basis.

5 6 Verification and Validation

5 6 1 Verification

[1] The RM shall conduct and document a verification review for new and revised technical procedures. Documented reviews shall be retained in the DHF. The following items should be considered as a minimum:

Operational Safety Analysis (OSA)/Operational Safety Requirements (OSR)/TSR/OSHA applicability

Ability to complete the task as written

Accurate directions for form completion

Complete, correct, and available references

Complete and accurate DHF package

A verification checklist in Appendix 9 of the SDRM may be used for verification review documentation.

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5 6 2 Validation

[1] For new or revised technical procedures, the RM shall conduct and document a validation review prior to approval. The RM assigns a validator to perform a simulated or actual walkdown of the document to determine whether the document can be correctly, safely, and effectively performed. A Validation Checklist (identified in Appendix 8 of the SDRM) may be used for documenting the review. The documented review shall be maintained in the DHF.

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5 7 Screening/Safety Reviews

[1] For all new or revised technical procedures, the RM shall obtain an SES/USQD process review in accordance with 1 C10 NSM 04 03 Safety Evaluation Screen and 1 C11 NSM 04 05 Unreviewed Safety Question Determination. Technical procedures may be exempted from the SES/USQD process if they meet the requirements of 1 C10 NSM 04 03 Appendix 1 Categorical Exclusion from the SES/USQD Review Process. Documented evidence of screening activities or exemption determination shall be retained in the DHF.

[2] The RM shall initiate an Independent Safety Review (ISR) (formerly known as Operations Review Committee [ORC] review) for all new or revised technical procedures. ISRs shall be performed in accordance with 1 52000 ADM 02 01 Operations Review Requirements. Documented evidence of ISRs will be retained in the DHF.

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5 8 Supplemental Review

[1] The RM should consider having documents extensively revised as a result of internal or external reviews, V&V reviews, safety screens, or ISRs resubmitted for review and comment.

[2] Prior to issue, the RM will consider the document for classification in accordance with the Site Security Manual.

5 8 Approval

[1] After resolution of comments, appropriate concurrence, and any required safety review comment resolution, the RM shall obtain a review for classification, as required, and approve the document. Approval authority for documents is depicted in Table 1. Approval documentation, including correspondence, shall be retained in the DHF.

[2] Documents become effective on the date indicated on the first page. The RM and organization managers should agree on the effective date to allow for necessary training prior to the effective date.

5 9 Training/Issuance/Document History File

[1] Training for effective implementation of RMRS documents will be considered on a case-by-case basis by the RM and other managers affected by the document. Where base competency requires training, it should be coordinated with the RMRS training organization. The RM shall participate in defining training, certification, and qualification requirements for the document generated.

[2] After approval of the document, the RM shall assemble the master document and DHF (ref. Section 3 definition) and formally transmit the package to RMRS Document Control.

- [3] With the exception of Job-Aids, all active documents must have a controlled distribution
- [4] Controlled distributions will be facilitated by RMRS Document Control using transmittal receipt acknowledgment forms. Controlled distribution should be extended to the Site Standards Management organization
- [5] RMRS Document Control will retain the master document and DHF in a one hour fire rated cabinet

5 10

Changes, Revisions, Periodic Reviews, and Cancellation

- [1] Changes to documents are facilitated by the RM. Changes differ from revisions in that changes do not require re-issue of the document, and may be handwritten, typed or word processed. The RM makes changes by obtaining the electronic copy from Document Control, and editing the document to reflect the change. A vertical change bar is placed to the left of the change in the document margin, and the date is placed vertically outside of the revision bar. No other changes to the page or header is required.
- [2] The RM determines if review of the change is required, and obtains needed review(s) prior to submitting the change to Document Control for controlled distribution. Review and comment disposition related to document changes will be documented.
- [3] The RM transmits the change to RMRS Document Control for controlled distribution of the change
- [4] The RM should initiate a document revision when changes have made the document difficult to perform, or when the process being controlled by the document has changed.
- [5] The RM begins the revision by initiating a Controlled Document Checklist, obtaining the electronic version from Document Control, making revisions as necessary, and following the process defined from Section 5.4 through 5.9. Revisions require the same level of review as the original issue
- [6] The RM should initiate a periodic review to ensure that the document accurately and adequately satisfies current technical and administrative requirements and guidelines. Frequency should be based on the following schedule
 - 1 year -- Emergency Preparedness procedures
 - 3 years -- Procedures that potentially affect vital safety systems
 - 4 years -- all other documents
- [7] The RM initiates cancellation of documents by formally notifying RMRS Document Control. Document Control facilitates cancellation through transmittal receipt form and retains the canceled document and DHF in accordance with records management requirements

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6 RECORDS

The following documents are initiated, processed or maintained as a result of this procedure and shall be processed as follows

Record Identification	Record Type Determination	Protection / Storage Methods	Processing Instructions
Documents related to WIPP/LL/LLM <ul style="list-style-type: none"> • Document History File (DHF) including the following as needed: a) completed review comment resolution documentation b) draft document submitted for review, c) justification for revision d) verification and validation e) electronic copy of approved document e) RMRS Controlled Document checklist 	<i>In-Process WIPP/LL/LLM Quality Assurance Record</i>	Manager shall implement a reasonable level of protection to prevent loss and/or degradation. Documents shall be protected utilizing standard office equipment and methods when not in use.	Continue prescribed processing of document(s). Once approved by the responsible manager, transmit the document and DHF to RMRS Document Control Center in accordance with DC 06 01.

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