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Risk Reduction and Environmental Stewardship— Remediation Services Project

Quality Procedure

for Corrective Action Process

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Corrective Action Process

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List of Acronyms and Abbreviations

AEA	Atomic Energy Act	QII	RRES-RS Project Quality Integration and Improvement Team
CAR	corrective action report		
DOE	U.S. Department of Energy		
HSR	health, safety, and radiation	QMP	Quality Management Plan
LANL	Los Alamos National Laboratory	QP	quality procedure
PAAA	Price-Anderson Amendments Act	QPPL	Quality Program project leader
PL	RRES-RS project leader	QS	quality specialist
		RRES-RS	Risk Reduction and Environmental Stewardship— Remediation Services

Corrective Action Process

1.0 PURPOSE

This quality procedure (QP) states the responsibilities and describes the process for providing a consistent mechanism for identifying, logging, resolving, and reporting conditions adverse to quality. The data captured in this system allow management to make informed decisions about how to employ resources in the most efficient manner to solve systemic problems. The success of this process ties directly to the participation of each employee within the Los Alamos National Laboratory (LANL) Risk Reduction and Environmental Stewardship, Remediation Services (RRES-RS) project.

2.0 SCOPE

- 2.1 All **ECR participants** shall implement this mandatory QP when identifying, documenting, reporting, and dispositioning nonconformances, deficiencies, and Price-Anderson Amendment Act (PAAA) noncompliances and for verifying the implementation of corrective actions for the RRES-RS.
- 2.2 **Subcontractors** performing work under the RRES-RS Quality Program shall follow this QP.

3.0 TRAINING

- 3.1 **ECR participants** shall train (e.g., read and/or classroom) to and use the current version of this QP; contact the author of this QP if the text is unclear.
- 3.2 **ECR participants** using this QP shall document training in accordance with QP-2.2.
- 3.3 The responsible **project leader (PL)** shall monitor the proper implementation of this procedure and ensure that the appropriate personnel complete all applicable training assignments.
- 3.4 **ECR participants** may request any needed assistance with implementation of this procedure from RRES-RS Quality Integration and Improvement (QII).

4.0 DEFINITIONS

- 4.1 *Condition adverse to quality*—An all-inclusive term that refers to the failure to meet performance objectives; malfunctions, deficiencies, defective items, or nonconformance; analytical data of indeterminate quality; and/or

a significant condition that, if left uncorrected, could have a serious effect on the environment, safety, health, cost, schedule, or operability.

- 4.2 *Conditional release*—Documented authorization to continue work on or continue using a nonconforming item, sample, or product before implementing an authorized corrective action report (CAR) disposition. Conditional release may be used to direct additional work activity necessary to provide information required to develop or determine a CAR disposition.
- 4.3 *Corrective action*—The action (e.g., remediation, investigation) taken to rectify and/or correct a nonconformance, PAAA noncompliance, or deficiency.
- 4.4 *Corrective action report (CAR)*—A document used to report the corrective action(s) for nonconformances, deficiencies, and PAAA noncompliances.
- 4.5 *Data quality determination*—The determination that samples were collected, analyzed, and reproduced by using known and acceptable procedures that can be verified (see section 4.6).
- 4.6 *Data admissibility determination*—The determination that data are suitable for admission to a court of law. Rule 901, “Requirement of Authentication or Identification,” of the Federal Rules of Evidence states regulatory requirements for data admissibility. In general the admissibility of data as evidence involves determination that
 - the data have not been altered or contaminated (e.g., by sampling procedures);
 - the test equipment was properly calibrated;
 - scientifically accepted were methods used; and
 - chain-of-custody was maintained and identification can be made of all individuals who handled the evidentiary data.

Guidance for determination of admissibility specifically regarding the use of accepted scientific methods may be obtained from historical forensic and pharmaceutical law cases; however, the findings of the U.S. Supreme Court in *Daubert vs. Merrel Dow Pharmaceuticals, Inc.* (1993) are most often referenced. According to these findings, to be admissible in a court of law, the scientific method used to obtain the data must meet the following requirements:

- It can be (and was) tested.
- It was subjected to peer review and publication.
- The error rate associated with the approach or methodology either is known or can be estimated.

- Standards exist and can be maintained to control its operation (i.e., it is supported by well-defined procedures for use).
 - It has attracted (i.e., achieved) widespread acceptance within a relevant scientific community.
 - It produces data that meet all the regulatory or permit requirements as well as data quality objectives for such criteria as (but not limited to) detection limit, target list, and selectivity.
- 4.7 *Deficiency*—A condition adverse to the quality of an activity, attribute, document, or procedure.
- 4.8 *Discard*—The disposition that is authorized when a nonconforming sample or item is considered unacceptable for its intended use.
- 4.9 *Dispositioner*—The RRES-RS project participant assigned responsibility for identifying impacts to the project that may result from an identified deficiency or nonconformance, performing root cause analysis, and identifying appropriate corrective action for a deficiency and/or nonconformance.
- 4.10 *Indeterminate*—The status of an item or data when its acceptability is incapable of being ascertained.
- 4.11 *Initiator*—The person who initiates a CAR.
- 4.12 *Item*—An all-inclusive term used to represent any of the following: assembly, component, environmental sample, equipment, material, module, part, structure, subassembly, subsystem, system, or unit.
- 4.13 *Limited-use*—The disposition that establishes limitations for use of nonconforming items.
- 4.14 *Noncompliance*—The condition in which an item fails to comply with applicable nuclear quality or safety requirements, specifically those governed by the PAAA. A noncompliance can be either a deficiency or a nonconformance.
- 4.15 *Nonconformance*—A deficiency in characteristic or record that renders the quality of an item or other work product unacceptable or indeterminate.
- 4.16 *Repair*—The process of restoring an item to a condition such that the item can function reliably and safely even though it does not conform to the original requirement.
- 4.17 *Rework*—The process by which an item is restored to its original specifications by completion or correction.

- 4.18 *Root cause analysis*—A management tool for identifying basic and contributing causes to identified quality and nuclear safety problems and for identifying corrective actions and prevention strategies.
- 4.19 *RRES-RS project participant*—an individual who is employed by the University of California or through a contract (e.g., subcontractor) to develop and produce products in accordance with identified RRES-RS project requirements (e.g., the RRES-RS Project QMP, a RRES-RS installation work plan, a RRES-RS standard operating procedure).
- 4.20 *Scrap/reject*—The disposition that is authorized when the nonconforming item cannot be reworked or repaired and is considered unacceptable for its intended use. Reject may include the return of an item or product to the original supplier.
- 4.21 *Suspect/counterfeit items*—An item that has been found to be bogus, unapproved, misrepresented (e.g., a used item represented as new), altered, and/or that contains trademark infringements.
- 4.22 *The PAAA Enforcement Project*—A program, mandated by Congress and carried out by the DOE in its enforcement of the PAAA, to subject contractors to potential civil and criminal penalties for violations of DOE rules, regulations, and orders relating to nuclear safety.
- 4.23 *The Price-Anderson Amendment Act of 1988 (PAAA)*—Federal legislation that provides the legal framework for the regulation and enforcement of nuclear safety standards. The history of the PAAA is rooted in the Atomic Energy Act of 1954 (AEA). The AEA, as amended, established provisions for the indemnification and limitation of public liability arising from nuclear incidents. In 1988, the PAAA was signed into law to renew the authority of the US Department of Energy (DOE) to indemnify contractors.
- 4.24 *Use-as-is*—The disposition that is authorized for a nonconforming item when evaluation or investigation establishes that the item is satisfactory for its intended use and no additional action is required.
- 4.25 *Violation*—A PAAA noncompliance that the DOE evaluated and found to violate an applicable nuclear safety requirement.

5.0 RESPONSIBLE PERSONNEL

The following personnel are responsible for activities identified in this procedure:

- dispositioner
- health, safety, and radiation (HSR) protection representative
- initiator
- project leader (PL)

- QPPL
- quality specialist (QS)
- RRES Division PAAA coordinator
- RRES-RS project PAAA coordinator
- ECR participants
- subcontractors
- user

6.0 PROCEDURE

6.1 Discover and Report a Nonconformance, Noncompliance, or Deficiency

Note: Anyone assigned to the RRES-RS project may initiate a CAR.

6.1.1 Upon discovery of a nonconformance, noncompliance, or deficiency (see attachment A for evaluation criteria), the **initiator** shall contact a QS member of QII to help with the initiation of a CAR (attachment B).

Note: Attachment C provides instructions for completing the CAR.

6.1.2 The **QS** shall enter the CAR into the QII CAR tracking log.

6.1.3 The **QPPL** shall maintain the original and copies of the QII CAR files until the CAR is closed.

6.1.4 In the event a CAR addresses a suspect/counterfeit item, the **QPPL** shall report the discovery in accordance with LANL Operations Support Tool No. OST 402-130-01, Laboratory Occurrence Reporting Requirement/Guidance, Section 7B, Defective Item, Materials, or Service.

6.1.5 If appropriate, the **initiator** and/or the **QS** shall apply a hold tag (see QP-10.4) to prevent further processing, installation, or inadvertent use of the item.

6.1.6 If the CAR addresses a serious condition adverse to quality, the **initiator** and/or the **QS** shall initiate a stop work report in accordance with QP-10.3.

6.1.7 In the event that a potential PAAA noncompliance is identified, the **QPPL** shall submit a CAR to the RRES-RS project PAAA coordinator for review.

- 6.2 Perform a PAAA Determination
- 6.2.1 The **RRES-RS project PAAA coordinator** shall review the CAR to determine if a PAAA noncompliance exists and complete Section III of the CAR.
- 6.2.2 With the belief that a noncompliance exists, the **RRES-RS project PAAA coordinator** shall consult with the RRES Division PAAA coordinator for review and noncompliance evaluation.
- 6.2.3 In the event that the noncompliance is determined to be a potential PAAA violation, the **RRES-RS project PAAA coordinator** shall implement the appropriate PAAA requirements as directed by the RRES Division PAAA coordinator, and inform the QPPL of this action.
- 6.3 Perform an HSR Review
- 6.3.1 If it is determined that the CAR addresses HSR considerations, the **QPPL** shall forward the report to the HSR representative for evaluation.
- 6.3.2 The **HSR representative** shall evaluate the report to determine if the stated disposition adequately addresses HSR concerns.
- 6.3.3 Upon concurrence, the **HSR representative** shall sign and date Section III, Item 22, of the CAR form and forward it to the QPPL.
- 6.4 Implement a CAR Disposition
- The assigned **dispositioner** shall complete Section II of the CAR by entering the appropriate information in Items 13 through 18 (refer to attachment C for specific guidance).
- 6.5 Log and Number a CAR
- 6.5.1 The **QPPL** shall maintain a convenience CAR log for tracking CAR progress and status.
- 6.5.2 The QPPL, assigned QS, or dispositioner shall use the log to record, at a minimum, the following information:
- whether or not the CAR is open or closed
 - the document (CAR) number (see QP-4.10, Document Development and Approval Process: Peer Review not Required)
 - the CAR issue date
 - the name of the CAR initiator
 - the nonconformance/deficiency subject

- the name of the dispositioner
- the response due date
- the response received date
- the corrective action verification date
- remarks

6.6 Initiate a CAR Closeout

- 6.6.1 When Sections I, II, III, and IV of the CAR are completed, the **QPPL** shall assign a QS to verify, in accordance with attachment C, the effectiveness of the implemented corrective action (i.e., that implementation both resolves and precludes any recurrence of the nonconformance or deficiency).
- 6.6.2 After completing the verification, and if the noted corrective action properly addresses and/or resolves the nonconformance or deficiency, the **QS** shall forward the report to the QPPL for review and concurrence and for updating the CAR report log in accordance with attachment C.
- 6.6.3 If applicable, the **initiator** and/or **QS** shall ensure the removal of hold tags, in accordance with QP-10.4.
- 6.6.4 After the CAR closure, the **QPPL** shall ensure the entry of all appropriate CAR data into the CAR tracking log.

6.7 Report Overdue Corrective Action

- 6.7.1 If a CAR remains open beyond the period agreed upon by the QPPL, dispositioner, and the responsible PL, the **QPPL** shall assign a QS to follow up on and resolve the open CAR.
- 6.7.2 If properly implementing corrective action and closing out the CAR require additional time, the **QPPL** shall assign a new closure date.
- 6.7.3 The **QPPL** shall implement this action by initiating and submitting a memorandum to the dispositioner, attaching a copy of the memorandum to the CAR on file.
- 6.7.4 If the QPPL finds that no action and/or no effort was made to respond to a submitted CAR and/or implement the identified corrective action, the **QPPL** shall forward the CAR to the RRES-RS project deputy project director for further action.
- 6.7.5 The **QPPL** shall, if warranted, initiate a stop work/restart report.

6.7.6 If the CAR addresses a noncompliance, the **QPPL** shall also submit the CAR and stop work/restart report (if applicable) to the RRES Division PAAA coordinator for review and additional processing.

6.8 Change a CAR

The **initiator, QPPL,** and/or **QS** shall document changes to a previously issued CAR either as amendments to the CAR form or on a continuation page attached to the CAR, ensuring that change documentation includes proper justification for the change(s).

6.9 Resolve a Dispute Regarding a CAR

Appropriate management shall handle disputes that arise during implementation of this procedure; if not resolved, the matter is elevated to progressively higher levels of management.

Note: Forward any created documentation to the QPPL as relevant correspondence to be included with the CAR as a record.

6.10 Develop a Trend Report

Every six months, the **QPPL** shall use the accumulated CAR data to develop a trend report and submit the report to management for review/action. The report documents the status of open report(s) and includes data applicable to the areas of concern identified.

7.0 LESSONS LEARNED

7.1 Before performing work described in this SOP, **ECR participants** should search for applicable lessons on the DOE Lessons Learned Information Services website (<http://www.tis.eh.doe.gov/ll/ll.html>) and/or the LANL Lessons Learned Resources website (http://www.lanl.gov/projects/lessons_learned/).

7.2 During work performance and/or after the completion of work activities, **ECR participants**, as appropriate, shall identify, document, and submit lessons learned in accordance with the guidance provided by the LANL Lessons Learned Resources website (http://www.lanl.gov/projects/lessons_learned/).

8.0 RECORDS

The **QPPL** shall submit, in accordance with QP-4.4, the following records to the Records Processing Facility:

- completed CARs
- electronic copy of the CAR and associated documents

- completed document signature form
- all documentation associated with the CAR (e.g., data, records, inspection reports) that support or evidence condition resolution and final acceptance

9.0 REFERENCES

9.1 To implement properly this QP, **ECR participants** should become familiar with the contents of the following documents, each of which is available at http://erinternal.lanl.gov/home_links/Library_proc.shtml:

- QMP
- QP-2.2, “Personnel Orientation and Training”
- QP-4.4, “Record Transmittal to the Records Processing Facility”
- QP-4.10, “Document Development and Approval Process: Peer Review not Required”
- QP-10.3, “Stop Work and Restart”
- QP-10.4, “Tagout and Control of Nonconforming Items, Samples, and Products”

9.2 **ECR participants** using this QP should also become familiar with the contents of these documents, available at the website addresses provided:

- Los Alamos National Laboratory (LANL) LIR 401-10-01, Stop Work and Restart (available at <http://www.lanl.gov/labview/>).
- Los Alamos National Laboratory Integrated Safety Management Description Document, #LAUR-98-2837 (available at http://www.lanl.gov/orgs/ism/pdfs/desc_doc.pdf).
- Price Anderson Amendments Act (available at <http://aea.genlaw.lanl.gov/PAAA/index.html>).
- Department of Energy (DOE) Standard No. DOE-NE-STD-1004-92, Root Cause Analysis Guidance Document (available at <http://tis.eh.doe.gov/techstds/standard/nst1004/nst1004.pdf>)
- LANL Operational Support Tool OST 402-130-01, Laboratory Occurrence Reporting Requirement/Guidance (available at http://labreq.lanl.gov/pdfs/ops/01_operations/ost40213001.pdf)
- Identifying, Reporting, and Tracking Nuclear Safety Noncompliances under Price-Anderson Amendment Act of 1988, DOE Office of Enforcement and Investigation (EH-10) operational procedure (supersedes DOE-HDBK-1089-95) (available at <http://tis.eh.doe.gov/enforce/handbks/hndbkr4g.pdf>)

- DOE Order 231.1A, Environment, Safety, and Health Reporting (cancels DOE O 232.1A) (available at <http://tis.eh.doe.gov/feosh/resource/440-1a.htm>)
- U.S. Department of Justice, Rules of Evidence, Article IX, Rule 901, "Requirement of Authentication or Identification" (available at <http://www.house.gov/judiciary/Evid2002.pdf>)

10.0 ATTACHMENTS

The **responsible ECR participant** may locate all forms associated with this procedure at <http://erinternal.lanl.gov/Quality/user/forms.asp>.

Attachment A: Evaluation of Nonconformance, Deficiency, Noncompliance, and Stop Work Conditions for Corrective Action, 2 pages

Attachment B: Corrective Action Report form, 1 page

Attachment C: Corrective Action Report Completion Instructions, 4 pages

[Using a token card, click here to record "self-study" training to this procedure.](#)

If you do not possess a token card or encounter problems, contact the RRES-ECR training specialist.

Attachment A: Evaluation of Nonconformance, Deficiency, Noncompliance, and Stop Work Conditions for Corrective Action

Criteria for Evaluation

The following criteria are used to evaluate a condition or item to determine if it presents a nonconformance or deficiency and, if so, if the nonconformance or deficiency may involve Price-Anderson Amendment Act (PAAA) noncompliance. Items or conditions identified as nonconformances or deficiencies must be reported using the Corrective Action Report (CAR) form (attachment B).

Nonconformance

A nonconformance is a deficiency in characteristic or record that renders the quality of an item or sample or product unacceptable or indeterminate. Examples of nonconformance are

- significant failure or breakdown in the implementation of Quality Program requirements;
- significant discrepancy between an approved design and the design's implementation;
- counterfeiting or false representation of an item's quality and characteristics;
- damage, such as that caused by improper construction, shipping, handling, or storage, that results in extensive evaluation, redesign, or repair to meet accepted or required quality and safety criteria; and
- compromise of or in items or activities important to safety or waste isolation that prevents mitigation of hazards to the safety and health of workers and/or the public.

Deficiency

A deficiency is a condition adverse to quality in an activity, attribute, document, data, or procedure that renders the quality of the activity unacceptable or indeterminate.

Examples of deficiencies are

- noncompliance to a procedure, plan, or program requirement,
- use of and/or reference to superceded or outdated documents (e.g., standard operating procedures, Department of Energy orders), and
- use of or reliance upon analytical data of indeterminate quality.

Noncompliance

A noncompliance is a nonconformance or deficiency that results in the failure to comply with a nuclear quality or safety requirement, specifically with regard to the regulations established by the PAAA.

Stop-Work Condition

A stop-work condition exists when continuing work would cause one or more of the following:

- irreparable compromise to the quality of scientific investigation results
- continued use of an item that does not function as intended due to a nonconformance in processing, installation, modification, or operation
- continued use of a suspect/counterfeit item
- significant hazard to the health or safety of workers and/or the public
- significant breakdown or failure in the implementation of Quality Program requirements
- compromise to the quality of items or activities important to safety or waste isolation

Attachment B: Corrective Action Report

(Use additional pages as necessary; refer to instructions in Attachment C.)

No. of pages: _____

Section I. Initiation (Initiator completes.)

1. Subject: _____	2. CAR No. ER200 -____ (Document Catalog Number) <input type="checkbox"/> Nonconformance <input type="checkbox"/> Deficiency	
3. Initiator: _____ (Print name, then sign) (Date)		
4. Related CAR number(s): _____	5. Controlling documents (e.g., FIP, MOU, QMP, QP, SAP, SOP, SOW): _____	
6. Requirement: _____	7. Describe the nonconforming/deficient condition: _____	
8. Stop work? <input type="checkbox"/> No <input type="checkbox"/> Yes	9. HSR issue? <input type="checkbox"/> No <input type="checkbox"/> Yes	10. Hold tag applied? <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> N/A
11. Disposition assigned to: _____ (Print name)		
12. Responsible manager: _____ (Print name, then sign) (Date)		

Section II. Disposition (Dispositioner completes items and submits form to the QPPL within **five working days**.)

13. <input type="checkbox"/> Rework <input type="checkbox"/> Repair <input type="checkbox"/> Use-as-is <input type="checkbox"/> Limited-use <input type="checkbox"/> Discard <input type="checkbox"/> Reject/scrap <input type="checkbox"/> Suspect/counterfeit		
14. Immediate corrective action: _____		Projected completion date: _____
15. Nonconformance/deficiency root cause analysis: _____		
16. Project/item impact: _____		
17. Corrective action to prevent recurrence: _____		Projected completion date: _____
18. Disposition submitted by: _____ (Print name, then sign) (Date)		

Section III. Potential PAAA Noncompliance Evaluation (RRES-RS PAAA coordinator completes.)

19. PAAA issue? <input type="checkbox"/> No <input type="checkbox"/> Yes. If "Yes," enter a statement addressing the evaluation and LANL PAAA determination: _____	
20. PAAA Coordinator : _____ (Print name, then sign)	(Date) _____
21. Submitted to the RRES Division PAAA coordinator for review? <input type="checkbox"/> No <input type="checkbox"/> Yes	Date: _____

Section IV. Disposition Approvals (HSR representative and QPPL complete.)

22. HSR Reviewer: _____ (Print name, then sign)	(Date) _____
23. QPPL Reviewer: _____ (Print name, then sign)	(Date) _____

Section V. Verification of Corrective Action Activities (Quality specialist and QPPL complete)

24. Description of method and results of verification (e.g., assessment, inspection, surveillance): _____	
25. Further investigation required? <input type="checkbox"/> No <input type="checkbox"/> Yes. If "Yes," explain: _____	
26. Verified by: Quality specialist _____ (Print name, then sign)	(Date) _____
27. Concurred by: QPPL _____ (Print name, then sign)	(Date) _____

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Attachment C: Corrective Action Report Completion Instructions

The numbered steps represent the numbered items on the Corrective Action Report (CAR) form. Complete only the applicable information. Items that are not applicable (n/a) should be marked “n/a.”

Note: Use a continuation page or reference attachments if additional space is required.

Section I. Initiation

The **initiator** completes Section I.

1. Enter information that identifies the subject of the CAR.
2. Enter the report number. Check either “Nonconformance” or “Deficiency” (refer to Quality Procedure 4.10 [QP-4.10], Document Development and Approval Process: Peer Review Not Required, to obtain a document catalog number and QP-3.4, Sections 4.5 and 4.13, to determine the type of report being submitted).
3. Print your name (initiator only), sign, and date.
4. Enter the number of the report that resulted in identifying the nonconformance or deficiency (e.g., assessment report, surveillance report, nonconformance/deficiency report, inspection report). Enter “n/a” if no related report exists.
5. Enter title, revision number, effective date, and document catalog number, if applicable, for the document that controls the nonconforming or deficient item.
6. State, in concise, narrative form, the requirement with which the item is in nonconformance or with regard to which the item is deficient; specifically reference (i.e., by paragraph and/or section number) the controlling document and revision numbers.
7. Describe, in concise, narrative form, the nonconforming/deficient condition found; include references to the results of any preliminary investigations.
8. Check “No” if there is not a stop-work condition; “Yes” if there is a stop work condition.
9. Check “No” if there is no health, safety, or radiation (HSR) protection issue; “Yes” if there is an HSR protection issue.
10. Check “No” if a hold tag has not been applied; “Yes” if a hold tag has been applied and “n/a” if this action not applicable.
11. Enter the name of the Risk Reduction and Environmental Stewardship—Remediation Services (RRES-RS) project participant assigned to disposition the report.

12. Have the responsible manager (e.g., RRES-RS project ECR group leader, subcontractor manager) print his or her name, sign, and date.

Section II. Disposition

The **dispositioner** completes Section II.

13. Check the item that best reflects the process that will be followed to address the nonconformance: rework, repair, use-as-is, limited-use, discard, reject/scrap, or suspect/counterfeit.
14. Enter a statement that identifies what corrective actions were taken to immediately correct and/or control the nonconformance or deficiency. Enter the projected completion date for the corrective action described.

Note: The statement of corrective action for the disposition of nonconforming items may include documentation of applied procedures, technical justification, and/or a statement addressing conditional release. Guidance for determining the applicability of these items to the corrective action statement follows.

Applied Procedures

For nonconforming items for which corrective action includes a designation of **repair**, **use-as-is**, **limited-use**, or **suspect/counterfeit**, the corrective action statement should demonstrate, in concise, narrative form, the procedures applied to the disposition.

These procedures may include

- QP-3.4, Sections 6.1.4 and 6.1.5, and QP-10.4—for removal, tagging, and control and reporting of suspect/counterfeit items to prevent continued use;
- QP-3.4, Section 6.2—for reporting and dispositioning potential PAAA noncompliance; and/or
- QP-10.4—for application of a limited-use tag and specification of use restrictions.

Technical Justification

For nonconforming items for which corrective action includes a designation of **repair** or **use-as-is**, the corrective action statement should include technical justification. The technical justification may include statements addressing

- the item's acceptability and the manner by which the item will continue to be subject to design controls (i.e., change document or other design revision),
- any action required to change the specifying document(s) or records to reflect acceptance of the nonconformance, and/or
- any requirement to re-examine repaired or reworked items and products in accordance with the original criteria or the criteria as revised to address the nonconformance.

Conditional Release

Corrective action for nonconforming items dispositioned as **limited-use, repair, or use-as-is** should include documented justification for the item's conditional release. The justification, a statement of applicable limitations, and appropriate approvals, may be included as an attachment to the CAR form. When establishing conditional release, the dispositioner should consider the following:

- whether the nonconforming item can be removed without unacceptable damage to its associated product(s)
- whether access to the item is necessary for any required inspections, tests, and/or continued but limited use
- whether tracing identification should be or has been established

Note: Conditional release may also be used when additional work is necessary to determine appropriate disposition for a nonconforming item.

15. Enter in narrative form the identified root cause and contributing causes for the nonconformance or deficiency. Guidance for performing a root cause analysis is available at <http://tis.eh.doe.gov/techstds/standard/nst1004/nst1004.pdf>.
16. Enter a descriptive statement that identifies the impact of the nonconformance or deficiency upon the RRES-RS project and/or the nonconforming item itself.
17. Enter in narrative form the corrective action(s) taken to prevent recurrence of the nonconformance or deficiency and the projected date by which the action(s) will be completed.

Note: The results of the root cause analysis should be used to determine the appropriate corrective action to prevent recurrence.

18. Print your name (dispositioner only), sign, date, and submit the form to the Quality Program project leader (QPPL) for further processing.

Section III. Potential Price-Anderson Amendment Act (PAAA) Noncompliance Evaluation

The **RRES-RS project PAAA coordinator** completes Section III.

19. Check "No" if the nonconformance or deficiency is not a potential PAAA noncompliance. If the nonconformance or deficiency is a potential PAAA noncompliance, check "Yes" and enter a statement addressing the PAAA evaluation and determination.
20. Print your name (RRES-RS project PAAA coordinator only) sign, and date.
21. Check "No" if the CAR will not be submitted to the RRES Division PAAA coordinator for review and date. Check "Yes" if the CAR has been submitted to the RRES Division PAAA coordinator and enter the date of submission.

Section IV. Disposition Approvals

The **HSR** representative and the **QPPL** complete Section IV.

Note: Refer to Section I, Item 9, of the CAR form. If the response indicated is “No,” the **dispositioner** enters “n/a” on the line for Item 22.

22. (HSR representative completes.) Review Section II of the CAR form. If you approve the information provided in Section II, print your name, sign, and date. If you do not approve Section II as completed, attach a statement to the CAR form describing your determination. Return the CAR form to the the QPPL (refer to QP-3.4, Section 6.3).
23. (QPPL completes.) Review Section II of the CAR form and the HSR information. If you approve the CAR form as completed, print your name, sign, and date. If you do not approve the CAR form as completed, return the form to the dispositioner for further action.

Note: If the QPPL determines that further action is required, the dispositioner should, as directed by the QPPL, resolve the disposition to complete the closure of the CAR (see QP-3.4, Section 6.5).

Section V. Verification of Corrective Action Activities

The **quality specialist (QS)** and **QPPL** complete Section V.

Note: Verification of corrective action activities should be performed no later than 180 days after completion of the corrective action.

24. (QS completes.) Enter a narrative description of the method (e.g., assessment, surveillance, inspection, test) used to verify disposition of the nonconformance or deficiency and the results of the verification. As applicable, identify all documents reviewed (include title, number, effective date, and identification number), employees interviewed, and measuring and test equipment used.
25. (QS completes.) Check “No” if no further investigation is required. If further investigation is required, check “Yes” and explain how further investigation will be implemented.
26. (QS completes.) Print your name sign, date, and submit the form to the QPPL for approval and signature.
27. (QPPL completes.) Review Item 25. If no further investigation is required, then indicate your concurrence with the CAR by printing your name, signing, and dating. If further action is required and the CAR cannot be closed, create an entry to the CAR tracking log explaining the reasons the CAR will remain open.