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I. PURPOSE AND SCOPE

This procedure establishes the process and responsibilities of the National Spent Nuclear Fuel Program (NSNFP) for conducting quality assurance (QA) surveillances of the NSNFP, NSNFP suppliers, and other activities requested by NSNFP management. NSNFP audit personnel who observe audits conducted by organizations other than NSNFP must document their activities and/or observation activity as surveillance in accordance with this procedure.

II. SUMMARY

This procedure covers surveillance team selection, notification, preparation, performance, observer inquiries, reporting, and distribution of surveillances. Surveillances are performed to verify the quality of work in progress and evaluate the effectiveness or maintenance of QA programs as well as the adequacy and timeliness of corrective action.

III. PROCEDURE

A. Surveillance Team Selection

QASM

1. During assessment planning and scheduling activities (NSNFP Procedure 18.01, "Planning and Scheduling Assessments"), select the surveillance team members (STMs) needed to meet the scope and complexity of the surveillance.

2. Ensure that selected STMs meet the following criteria:

   a. Have sufficient authority and organizational freedom to make the process meaningful and effective.

   b. Will be independent of any direct responsibility for performing the work being audited.

   c. Will have experience and training commensurate with the scope, complexity, or special nature of the activities under surveillance.

QASM 3. Select a surveillance team lead (STL) to manage the surveillance.

a. Prior to commencing the surveillance process, verify by completing NSNFP Form 18.04-6 that the STL meets the requirements for an auditor in accordance with NSNFP Procedure 18.04, "Qualification of Audit Personnel."

STL 4. Prior to performing the surveillance, verify by completing NSNFP Form 18.04-6 that auditors and technical specialists meet the requirements specified in NSNFP Procedure 18.04.

QASM 5. Provide the surveillance team the resources necessary to implement the surveillance.

B. Surveillance Notification

STL 1. Notify the organization to be evaluated of the planned surveillance. This notification may be accomplished by issuing the assessment schedule per NSNFP Procedure 18.01.

a. Contact the management of the organization to be evaluated by surveillance and discuss the scope of the surveillance.

b. Confirm activity schedules and the availability of personnel from the organization scheduled for surveillance.

c. Request a point of contact for the surveillance.

d. Request access to SNF activity areas, documents, and personnel.

e. For SNF sites and NSNFP suppliers, request that facilities are made available for the surveillance team to meet (if needed) and for meeting with management.

C. Preparing for Surveillance Activities

STL

1. Identify and obtain the documents appropriate to the assigned surveillance.

2. Initiate Parts A and B of Form 18.03-2, "Surveillance Report," according to form instructions.

3. Assign STM (where team is used) activities and criteria from the scope of the surveillance.

4. When deemed necessary by the STL, direct team members to prepare Form 18.02-3/18.03-3, "NSNFP Audit/Surveillance Checklist," and use it as guidance during the surveillance.

STL 5. Provide all observers with Form 18.02-1/18.03-1, "Observer Inquiry," and the form instructions for use during the surveillance.

D. Surveillance Performance

STL 1. Conduct the surveillance.

a. Manage and supervise the surveillance team when used.

b. Coordinate the preparation and issuance of deficiency reports (DRs) and evaluate the significance of DRs.

c. Identify corrective action requests (CARs) and evaluate stop work orders.

d. Generate the surveillance report and accumulate records.

STL/STM 2. Conduct the surveillance using the following methods or combination of methods, and provide results to the STL for inclusion into the surveillance report.

a. Examine objective evidence for proper and effective implementation of the quality assurance program.

b. Interview personnel

c. Review process objectives and measurement criteria

d. Review records

e. Observe activities, personnel performance, in-process analysis, and testing

f. Determine the technical adequacy and effectiveness of analytical processes used in engineering, scientific investigation, operations, technical activities, or processes.

3. If a condition adverse to quality is observed, prepare a draft DR/CAR in accordance with NSNFP Procedure 16.02, "Corrective Action."

STM a. Submit draft DR/CARs to the STL.

STL/STM 4. Upon discovery, immediately report conditions posing imminent danger to affected personnel and the responsible supervisor or manager; follow up in writing.

5. Elevate issues that cannot be resolved by the surveillance team and organization under surveillance to the QASM for resolution.

STL/STM 6. Verify that conditions adverse to quality, which were reported by the responsible organization to be isolated and corrected during the audit (CDA), were actually corrected, and document them as CDA in accordance with NSNFP Procedure 16.02.

STL 7. As appropriate, conduct meetings with the surveillance team to discuss surveillance progress and any issues identified during the surveillance.

8. As appropriate, conduct meetings with management of the organization under surveillance to discuss progress and any issues identified during the surveillance.

QASM 9. Resolve issues that cannot be resolved between the surveillance team and the organization under surveillance.

E. Observer Inquiries

STL 1. During the surveillance, survey the observers, discuss their inquiries to ensure they apply to the surveillance scope, and resolve them.

a. Encourage observers to document any unresolved inquiries on Form 18.02-1/18.03-1, "Observer Inquiry."

b. Evaluate any documented inquiries, and respond on the Observer Inquiry form.

c. If an inquiry identifies a deviation from requirements during the surveillance, document the inquiry on Form 16.02-1, "NSNFP Deficiency Report (DR)/Corrective Action Request (CAR)," in accordance with NSNFP Procedure 16.02 and form instructions, and note this action on the Observer Inquiry form.

d. Sign the Observer Inquiry form and provide a completed copy to the observer.

e. Elevate unresolved inquiries, if any, to the NSNFP QASM for resolution.

QASM 2. Resolve any unresolved observer inquiries elevated by the STL.

3. Document the resolution and response on the Observer Inquiry form, sign it, and provide a copy to the observer and STL.

F. Completing the Surveillance Report

STL 1. Document the results of the surveillance in Part C of Form 18.02-3, "Surveillance Report," in accordance with form instructions. Issue the report within approximately 30 days of completing surveillance field work.

STL 2. Attach a copy of the approved DR/CAR forms to the surveillance report. DRs and CARs are controlled in accordance with NSNFP Procedure 16.02 and are typically distributed (separate from the surveillance report) for action 11 working days after completion of surveillance activities.

3. Sign the surveillance report, prepare a transmittal letter or memo, and obtain the QASM's approval.

G. Report Distribution

QASM 1. Approve and sign the surveillance report and transmittal letter or memo and distribute it to the audited organization's management; Manager, NSNFP; STL and STMs; and audit observers.

IV. REFERENCES

None.

V. DEFINITIONS

Terms appearing in italics followed by the notation "see glossary" are defined in the NSNFP Documents Manual Introduction and Glossary.

VI. ATTACHMENTS

None.

VII. QUALITY RECORDS

The following quality records generated as a result of this procedure require retention in accordance with the identified classification and NSNFP Procedure 17.01.

Lifetime

A. Surveillance Notification Letter, if applicable

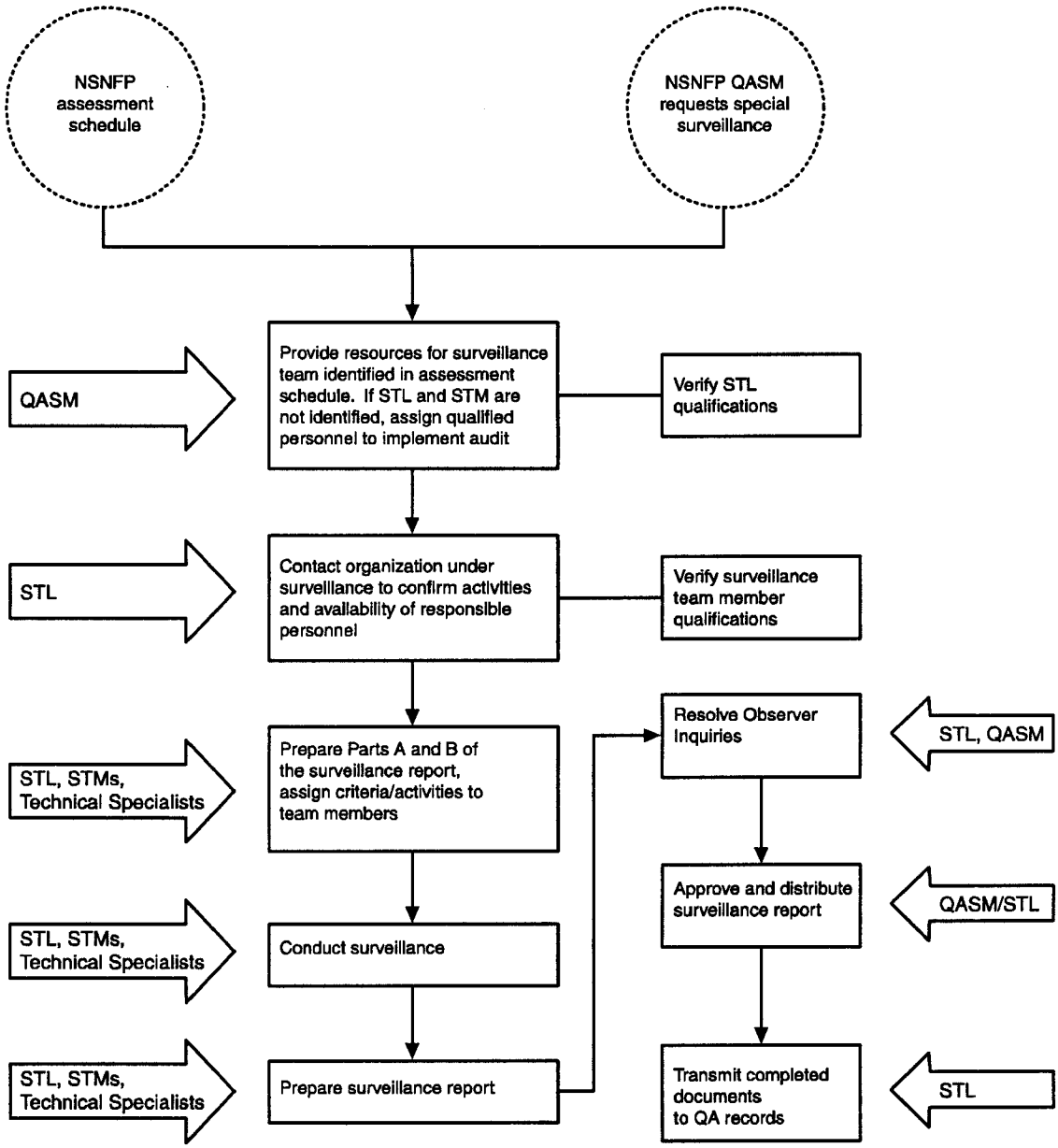
B. Surveillance report and transmittal letter/memo notifying the evaluated organization that the surveillance is closed

C. Completed Observer Report Inquiry forms

D. Observer Report, when applicable

E. Assessment Team Member Records (NSNFP Form 18.04-6)

Nonpermanent

A. Approved Surveillance Checklist, if used.

VIII. PROCEDURE FLOW DIAGRAM