

Waste Treatment Plant Project

Maintaining Your Quality Assurance Program

Tom Hughes

WTP Manager of Quality

07-August-2015







Benefits of Maintaining Your Quality Assurance Program

- Provides structure and framework for work performed
- Establishes requirements for quality-affecting activities
- Demonstrates, to employees and customers, the supplier's commitment to quality
- Delivers confidence to customers and reduces the amount of time, effort, and resources required by customers when evaluating a potential supplier
- Enhances the ability to deliver quality products and services that consistently meet requirements
- Reduce potential rework and back charges
- Provides documentation required for nuclear work
- Retain standing on customer-approved supplier lists

- WTP suppliers with mature and robust Quality Assurance (QA) programs have in common the following characteristics of highly effective nuclear suppliers:
- Establish the applicable NQA-1 requirements in their QA manual and (ideally) specify which NQA-1 requirements do not apply
 - Challenge: A supplier did not establish all applicable NQA-1 requirements in their QA manual, but instead used a procedure to establish certain high level NQA-1 requirements. Furthermore, how-to instructions were not included in the procedure
- Provide controls (i.e., the how to) for implementing their QA manual requirements in procedures
 - Challenge: A supplier did not have a procedure to address when and how to write a procedure (e.g., how to obtain a document number, what form to use) or how to qualify lead auditors

- Notify customers of significant changes to their QA program
 - Challenge: A supplier worked for a significant period of time to a revision of their QA manual that was not submitted to WTP for review and approval. As a result, when items were shipped, the supplier's Certificate of Conformance referenced the current revision, not the revision reviewed by WTP and listed on the Evaluated Suppliers List (ESL). As a result, the items could not be received and accepted.... without further action
- Do not perform work outside of their QA program
 - Challenge: WTP procurement documents allowed a supplier to qualify a sub-tier supplier via an A2LA certificate review, in lieu of an audit, if the supplier's QA program allowed the method of qualification. The supplier performed the A2LA cert reviews however, their program did not allow the method of qualification

- Objective evidence is maintained to substantiate procedure steps
 - Challenge: A supplier's ultrasonic test (UT) procedure required UT reports to include various information (e.g., operator's certificate level, setup couplant used, cable type and length). However, the report form did not require it, and the information was not included in reports
- Suppliers are fully aware of technical and quality requirements imposed by their customers
- Challenge: A supplier was aware that ASNT Recommended Practice SNT-TC-1A was imposed on them, but did not know the edition required by the WTP procurement document. As a result, the supplier was recertifying Level I and II personnel every 5 years, not every 3 years as required by the edition imposed on them

- Adequately qualify sub-tier suppliers before using their services
- Challenge: A supplier added a Non-destructive examination (NDE) supplier to its Approved Suppliers List (ASL) based on a WTP audit, contrary to the requirements of NQA-1 and its QA program
- Flow down applicable requirements to sub-tier suppliers
 - Challenge: A supplier failed to impose the requirement for its sub-tier supplier to submit its commercial grade dedication procedure, and as a result, the CGD procedure was not transmitted to WTP for approval prior to work

- Foster a culture that encourages identification and correction of problems by being transparent and self-critical
- Challenge: A supplier's personnel demonstrated a general lack of knowledge and understanding of the corrective action process and when to write a corrective action report (CAR), which was evident in that the supplier had not self-identified any CARs in its corrective action system
- Utilize the Supplier Deviation Disposition Request Process
- **Challenge:** A supplier did not submit a supplier deviation disposition request (SDDR) to request approval to deviate from WTP requirements prior to performing work

What to Expect....

- Initial QA manual review(s) to determine readiness to be audited
- Qualification audit to evaluate the adequacy, implementation, and effectiveness of the QA program with additional implementation audits conducted as necessary
- Addition to the WTP Evaluated Suppliers List (ESL), as applicable
- Annual supplier evaluations to confirm WTP ESL data (e.g., contact information, location, QA manual revision) and to determine the need to schedule additional surveillances
- Surveillances based on performance, as follow-up to previous oversight activities, to validate new locations and corrective actions, etc.
- Triennial audit(s) to evaluate the adequacy, implementation, and effectiveness of the QA program

QUESTIONS?