



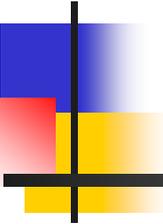
EM Environmental Management

safety ❖ performance ❖ cleanup ❖ closure

www.em.doe.gov



Energy Facility Contractors Group

A decorative graphic on the left side of the slide, consisting of a vertical black line intersected by a horizontal black line, with a blue square above the intersection and a yellow square below it.

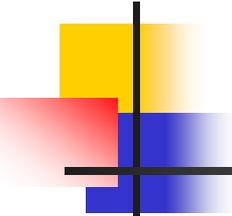
Proposed Technical Approach for Grading Quality Assurance for Deactivation & Decommissioning Projects

SEPTEMBER 15, 2010

2010 DOE INTEGRATED SAFETY MANAGEMENT CHAMPIONS
WORKSHOP

BRENDA HAWKS – EM QA DIRECTOR, OAK RIDGE

OFFICE



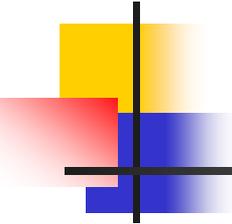
ORO Deactivation and Decommissioning Projects

BRENDA HAWKS – ORO

QUALITY ASSURANCE DIRECTOR, OAK RIDGE OFFICE

**MASTERS IN POLYMER CHEMISTRY/CHEMICAL
ENGINEERING; BACHELOR OF SCIENCE CHEMICAL
ENGINEERING; BACHELOR OF SCIENCE POLYMER
CHEMISTRY; WITH OVER 24 YEARS OF NUCLEAR
EXPERIENCE IN VARIOUS ASPECTS OF SAFETY,
ENVIRONMENT, QUALITY, OPERATIONS, AND SAFETY
ANALYSIS**

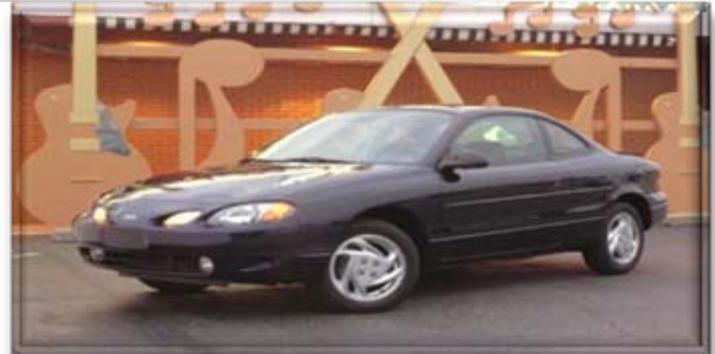
Current Allowance for Grading Exists

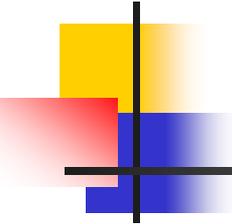


1. Environmental Management (EM) Corporate Quality Policy allows grading – “It is EM Policy that all EM projects will have a consistent quality assurance (QA) approach while allowing for grading based on importance to the EM mission and safety, and for site-specific requirements.”
2. EM Quality Assurance Program (QAP) Scope states: “The requirements of the QAP are applied in a graded fashion commensurate with the type of work being performed and the importance of the work contributing to safe completion of the EM mission.”
3. NQA-1 states: “...fosters the application of these requirements in a manner consistent with the relative importance of the item or activity.”

Know Your Contract

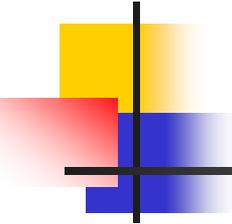
No need to require something that does not add to safety or mission accomplishment – even if we all may like the “gold plated” model.





Things to Consider for Grading

1. Scope of contract
2. Length of contract
3. Size of contractor staff/employees
4. Hazard level of activities (nuclear, security, chemical, industrial, electrical, etc.)
5. Method of performance – direct, subcontract to qualified vendor, or memorandum of agreement with other Department of Energy (DOE) Prime Contractors
6. Complexity of work activities
7. What is the end state for the facility/activity



GRADING

1. The field needs to wisely exercise grading through collaboration between the project, quality, and safety personnel on the DOE side and contractor side.
2. Deactivation and decommissioning (D&D) activities present a unique opportunity for grading as the end state of the facility/activity allows for quality grading of areas that would not be appropriate in an operating facility.
3. The application of Part II requirements can frequently be met by the requirements in the contract in lieu of the specifics in NQA-1.



2000 Complex Buildings
(interior views)

ORNL 2000 Complex



Before

ETTP K-25
West Wing Demo

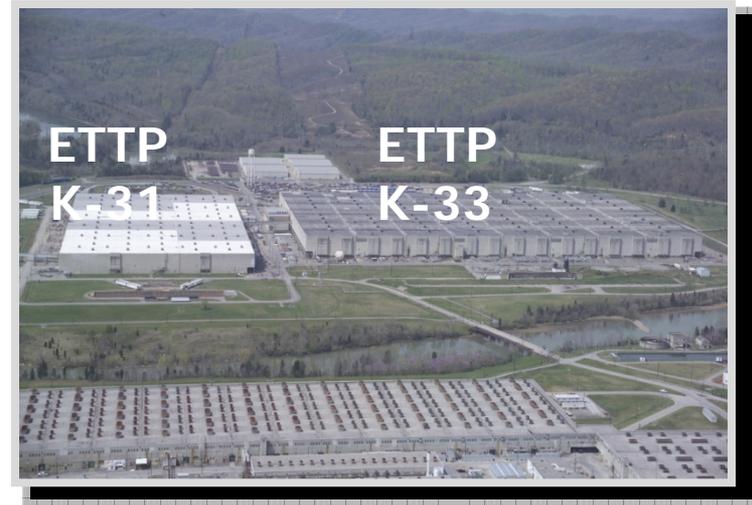


After

ORO D&D Projects



ORNL 3026 Wooden Superstructure



ETTP
K-31

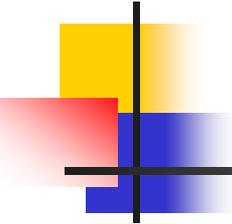
ETTP
K-33

Grading –

Scope and Length of Contract

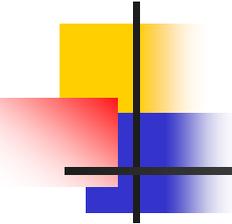
All 18 requirements are appropriate for grading based on the considerations discussed (e.g., scope, length of contract, hazard, size of contractor, etc.)

1. Organization
2. Quality assurance program
3. Design control
4. Procurement document control
5. Instructions, procedures, and drawings
6. Document control
7. Control of purchased items and service
8. Identification and control of items
9. Control of special processes
10. Inspection
11. Test control
12. Control of measuring and test equipment
13. Handling, storage, and shipping
14. Inspection, test and operating status
15. Control of nonconforming items
16. Corrective actions
17. Quality assurance records
18. Audits



Conclusion

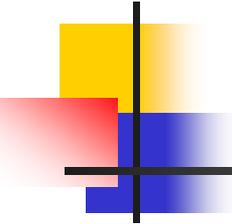
- The field has the authority to appropriately grade the implementation of quality requirements today.
- Grading must be made based on the contract, the contractor, and with regards to safety and overall EM mission.
- The approach that should be adopted is - grading should be specifically called out and specified in the DOE approved QAP/QIP. This ensures that all parties understand the quality requirements and there will be no confusion during oversight activities on either side.



Conclusion (continued)

Remember:

- Long term solutions on a short term contract will not work.
- Maintaining a system in optimum working order, when the end state is to demolish the building is not practical.
- Formal assessments for the sake of assessments does not provide any benefit to safety or mission accomplishment.
- Must always keep the end in sight when executing quality requirements as NQA-1 states – focus on the achievement of results, emphasize the role of the individual and line management in achievement of quality and foster the application requirements in a manner consistent with the relative importance of the item or activity.



Questions?

- Contact information:

Brenda L. Hawks

Quality Assurance Director

Environmental Management, Oak Ridge Office

Phone: 865-576-2503

Pager: 865-231-1834

E-Mail: hawksbl@oro.doe.gov