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

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Proposed Technical Approach for Grading QA for D&D Projects
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
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.
ORNL 2000 Complex

Before

ETTP K-25
West Wing Demo

After

ORNL 3026 Wooden Superstructure

ORO D&D Projects

ETTP K-31

ETTP K-33

Proposed Technical Approach for Grading QA for D&D Projects
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?

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