

WP 15-PC3041

Revision 8

Approval/Variation Request Processing

Management Control Procedure

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Lynn Whiting
APPROVED FOR USE

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INTRODUCTION ¹

This procedure provides instructions for processing individual and/or multiple supplier technical submittals for Washington TRU Solutions LLC (WTS) review and/or approval. Analytical data, drawings, specifications, plans, procedures, and other technical documents shall be submitted for review, approval, or disposition in accordance with the subcontract or purchase order (PO) requirements as required by the Approval/Variation Request (AR/VR) Transmittal Register. Nontechnical (e.g., invoices, requests for progress payment, accruals) are not submitted via the AR/VR process.

The AR/VR process is implemented when the PO/subcontract has been awarded, with the exception of a Master Task Order Agreement (MTOA) release. The AR/VR process is implemented each time a Task Order (TO) is released against the MTOA. This procedure applies to procurement actions that specify the use of the AR/VR process in the applicable Purchase Requisition (PR) or Statement of Work (SOW).

All records generated by the implementation of this procedure will be handled, stored, and dispositioned in accordance with the Subcontract Technical Representative's (STR's) section Records Inventory and Disposition Schedule (RIDS).

NOTE

For purposes of this procedure, an "equivalent form" is a form created in a software program other than the software used for the published form, which is Adobe Acrobat, Word, or WordPerfect. The equivalent form must contain all elements of the published form. Use of the equivalent form is intended for those instances in which use of the published forms is not conducive to the end user typing form data, or the software to enter information in the published form is not available to the end user. These forms may be used in place of any of the EAs where their use is required throughout the procedure.

Performance of this procedure generates the following records:

- EA15PC3041-1-0, AR/VR Transmittal Register (or equivalent form)
- EA15PC3041-2-0, Approval/Variation Request (or equivalent form), including all associated attachments
- EA15PC3041-3-0, Approval/Variation Request Comment Sheet (or equivalent form)

DEFINITIONS

Approval Request (AR) - The process by which a subcontractor submits documents for WTS determinations.

Conditional Approval - Authorization provided by the technical manager for the subcontractor to proceed with work, but not go beyond conditions stated.

Nontechnical Submittal – Supplemental information submitted by the subcontractor to the STR or cognizant organization's representative (e.g., Control Account Manager) during the course of the PO/subcontract. Examples include budgetary estimates, accruals, status reports, nontechnical plans, information available from subcontractors' web sites, but desired by the STR to be transmitted by subcontractor.

Subcontract Technical Representative (STR) – A person nominated by management and approved by Procurement to administer all technical subcontract requirements that would include the Statement of Work (SOW), safety requirements, quality assurance (QA) requirements, and required subcontractor training.

Technical Submittal - Analytical data, drawings, specifications, plans, procedures, and other technical documents related to the PO/subcontract.

Variation Request (VR) - The process by which a subcontractor requests a variation from the technical or other requirements specified in the SOW or specification.

REFERENCES**BASELINE DOCUMENTS**

- WP 09-CN3007, Engineering and Design Document Preparation and Change Control
- CCP-QP-001, CCP Graded Approach
- WP 09-CN3005, Graded Approach to Application of QA Controls

REFERENCED DOCUMENTS

- WP 15-PC3609, Preparation of Purchase Requisitions
- EA15PC3041-1-0, AR/VR Transmittal Register
- EA15PC3041-2-0, Approval/Variation Request
- EA15PC3041-3-0, Approval/Variation Request Comment Sheet

PERFORMANCE

1.0 INITIATING AR/VRs

- 1.1 Requisitioner, indicate in the SOW, PR, or Specification if the AR/VR process is required.
- 1.2 Requisitioner, identify all required data submittals and provide a schedule of those submittals on EA15PC3041-1-0, such as:
 - Project Plan
 - Quality Assurance (QA) Program Manual
 - Welding Procedures
 - Welder Qualifications
 - Visual Weld Inspection Procedures
 - Nondestructive Examination/Inspection Personnel Qualifications
 - Inspection/Test Reports
 - Supplier's Certificates of Compliance
 - Final Data Package
 - Others, as applicable

NOTE

Depending on the complexity of the procurement, the Requisitioner and Reviewers may include additional data deliverable requirements as needed.

- 1.3 Requisitioner, submit electronic PR/PRCN to Procurement (along with the SOW, EA15PC3041-1-0, and required associated documentation) in accordance with WP 15-PC3609.
- 1.4 Buyer, include the appropriate form(s) (EA15PC3041-1-0 and/or EA15PC3041-2-0) in the Request for Proposal and resulting PO/subcontract.
- 1.5 STR, after placement of the subcontract and performance begins by the subcontractor, review AR/VR and any attachments submitted by the supplier for the following:
 - Legibility
 - Completeness
 - Appropriate numbering system
 - PO line item properly referenced
 - Correct number of copies
- 1.6 STR, if the AR/VR is **NOT** acceptable, notify the supplier to correct the deficiencies and resubmit the AR/VR with corrections.

1.7 STR, perform the following for acceptable AR/VR submittals:

NOTE

The supplier may submit AR/VRs as facsimile, e-mail, or electronically to WTS.

1.7.1 Retain a copy of the AR/VRs in the appropriate file until "original" or best available copy is returned with all signatures.

1.7.2 Record applicable data on EA15PC3041-1-0.

1.7.3 Process AR/VR and EA15PC3041-3-0, as follows:

[A] Determine the appropriate review based on approvals on the PR and Attachment 1, Approval/Variation Request Special Review Requirements.

NOTE

The STR should consult with the Cognizant Engineer or other cognizant professional responsible for the PR if any questions arise regarding approvals or other information.

[B] Distribute AR/VR copies and attachments for review.

2.0 AR/VR TECHNICAL REVIEW

2.1 AR/VR Reviewer(s), perform technical review of the AR/VR as follows:

2.1.1 Review AR/VR in a timely manner (approximately three working days, or within a time frame that does not adversely impact the PO/subcontract schedule).

NOTE

Comments shall be traceable to the appropriate document reference (i.e., Specification number, drawing number, document paragraph), and are documented on EA15PC3041-3-0.

2.1.2 If there are comments needing resolution, provide all comments on EA15PC3041-3-0 to the STR before signing.

2.1.3 Contact STR and sign the original AR/VR in the appropriate section.

2.1.4 If comments are provided on an attachment, verify all comments are traceable to the referenced document, including the AR/VR number.

3.0 AR/VR APPROVAL

- 3.1 STR, resolve any review comments by recording all resolutions, exceptions, or reasons for rejection or disapproval on EA15PC3041-2-0 and/or EA15PC3041-3-0.

NOTE

Any AR/VRs that are conditionally approved or disapproved require an amended AR/VR to be processed. Conditional approvals may provide the authorization to proceed or specify activities requiring completion before approval can be granted. If necessary, the STR will arrange a comment resolution meeting to expedite the review and approval process. The STR may request that the supplier attend the meeting or participate in the meeting by phone.

- 3.2 STR, obtain Reviewers' signatures in the appropriate block on the appropriate AR/VR sheet.
- 3.3 STR, sign in the designated block on the appropriate AR/VR sheet.
- 3.4 STR, submit AR/VR and any attachments to the responsible Technical Manager for approval.
- 3.5 STR, if Technical Manager does not approve the AR/VR, obtain resolution.

NOTE

The signature of the Technical Manager constitutes authorization to initiate work. Procurement approval must be obtained if the submittal affects schedule or pricing, or if it requires a contract change notice.

- 3.6 Technical Manager, signify technical authorization to "proceed" or "not proceed" on the AR/VR by checking the recommended disposition and signing in the appropriate block of the AR/VR sheet.

NOTE

The approved EA15PC3041-2-0 (AR/VRs) involving/resulting in changes to baseline documents could result in the initiation of an Engineering Change Proposal (ECP) or in updating the Engineering Change Order (ECO) or the ECO Addendum.

- 3.7 STR, in the case of construction, Architecture & Engineering (A&E) subcontracts, and/or fabrication, provide all applicable VRs to the Cognizant Engineer for incorporation into the supplier's as-built drawings that involve variations from original contract documents.

- 3.8 Technical Manager, complete the signed AR/VR form, disposition Blocks 17, 18, and 19 and return the AR/VR to the STR.

NOTE

The "record" copy of the dispositioned AR/VR along with the "original" or "best available" supporting documentation will be retained by the STR or the cognizant organization.

- 3.9 STR, provide the dispositioned AR/VR, to include applicable comments, marked-up drawings, specifications, or other documents to the supplier for resolution as indicated and record the date in Block 20. If the submittal affects schedule, price, or requires a contract change notice, obtain Procurement approval.
- 3.10 STR, after completion of the project, provide the Cognizant Engineer with copies of the completed AR/VR, with attachments, as requested on EA15PC3041-2-0.
- 3.11 STR, provide a copy of the AR/VR completed cover page (EA15PC3041-2-0) to the Buyer.
- 3.12 STR, ensure that all submittals are completed (dispositioned) before release of the items that require AR/VR documentation.
- 3.13 STR, complete transaction dates on EA15PC3041-1-0 in the columns for the disposition, the resubmittal required, and date to the supplier. Retain the original (record copy) of the dispositioned AR/VR along with the original or best available supporting documentation.
- 3.14 STR, if further submittals are required, place original AR number with a dash (e.g., AR#12-1, AR#12-2, and so on) then **GO TO** Step 1.5 and repeat the process until all AR/VR submittals are approved.
- 3.15 STR, provide a completed copy of EA15PC3041-1-0 to the Buyer when all AR/VRs have been dispositioned.
- 3.16 STR, ensure that all original AR/VRs are submitted in accordance with the RIDS at the completion of the subcontract/PO.

Attachment 1 - Approval/Variation Request Special Review Requirements

SPECIAL REVIEW REQUIREMENTS

	COG ENG	QA	SEC*	S&H*	COGNIZANT ORGANIZATION OR STR
CONSTRUCTION WORK					
Quality Level 1	X	X			X
Quality Level 2	X	X			X
Job Hazard Analysis			X	X	X
Materials/Chemicals Requiring MSDS			X	X	X
Fire Protection	X	X		X	X
Work Orders		X	X		X
SERVICE WORK					
Quality Level 1	X	X			X
Quality Level 2	X	X			X
Job Hazard Analysis			X	X	X
Materials/Chemicals Requiring MSDS			X	X	X
On-Site Work		X	X	X	X
FABRICATION*					
Quality Level 1	X	X			X
Quality Level 2	X	X			X
Drawings/Specifications	X	X			X

NOTE: The STR organization may request additional reviews in addition to those listed above.

This matrix IS NOT necessarily all inclusive of AR/VR submittals.

* Any fabrication of work performed on-site will require review by Safety and Health (S&H) and Site Environmental Compliance (SEC).