

**U. S. Department of Energy**  
**Carlsbad Field Office**

**MANAGEMENT PROCEDURE**

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| <b>CBFO MP 1.2, Rev. 2</b> |
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Effective: 30 July 2007

**SUBJECT: SELECTION OF QUALITY LEVELS**


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 Manager, Carlsbad Field Office: //signature on file//

Date:

**1.0 PURPOSE**

The purpose of this procedure is to provide instructions for the selection of quality levels (QLs) for CBFO work activities.

**2.0 SCOPE**

This procedure applies to those CBFO personnel who determine and implement quality levels in accordance with applicable CBFO *Quality Assurance Program Document* (QAPD) and management procedure (MP) requirements. This procedure applies to all CBFO work activities. Quality level grading for CBFO activities is based on the Work Breakdown Structure (WBS), at level 3 minimally, or at lower levels if needed to appropriately classify work. This procedure supersedes MP 1.2, Revision 1, *Selection of Quality Levels*.

**3.0 REFERENCES AND DEFINITIONS**

## 3.1 References

CBFO-94-1012, *Quality Assurance Program Document*

## 3.2 Definitions

- Refer to the CBFO QAPD Glossary.
- QL 1 - Those activities required to directly demonstrate that the quality assurance program has been established and executed in the area of nuclear safety and/or in the areas identified in 40 CFR 194.22 pertaining to waste characterization and assumptions; environmental and disposal system monitoring; measurements of geological, groundwater, meteorological, and topographic characteristics; computations and computer codes; design of disposal systems; data collection.
- QL 2 - Level assigned to activities that are not assigned QL 1. QL 2 activities require good management and engineering practices. QL 2 activities may utilize the requirements set forth in the CBFO QAPD and MPs.

**4.0 RESPONSIBILITIES**

## 4.1 CBFO Manager

4.1.1 Ensures that the requirements of this procedure are established and implemented for the application of a graded program for the CBFO.

4.1.2 Determines the quality levels for activities that will be performed within the Office of the Manager.

**AVAILABLE ONLINE AT:**

<http://bellview/cbfo/Procedures/ProcedureManualTOC.htm>

**INITIATED BY:**

Office of Quality Assurance

4.2 CBFO Quality Assurance Manager (QAM)

- 4.2.1 Ensure the quality-affecting activities that will be performed within the QAM's area of responsibility are graded in accordance with this procedure.
- 4.2.2 Review and concur with the assignment of the QLs for CBFO activities.
- 4.2.3 Coordinate quality level reviews for the CBFO when notified by the Office Director of the Office of Business that the WBS has been revised.
- 4.2.4 Integrate QL determinations from the CBFO Assistant Manager (AM) and Office Directors into one master Quality Level Determination Form (Attachment 1) for the CBFO.

4.3 CBFO AM and Office Directors

- 4.3.1 Ensure the quality-affecting activities that will be performed within the AM's and Office Director's area of responsibility are graded in accordance with this procedure.
- 4.3.2 Concur with the selection of QLs in accordance with section 5.2 for CBFO internal activities inclusive of their area of responsibility.

4.4 CBFO Office Director of the Office of Business

Notify the QAM when the WBS for CBFO is revised.

4.5 CBFO Staff (Initiator)

Propose QLs in accordance with section 5.2.1 for CBFO internal activities inclusive of their area of responsibility.

**5.0 PROCEDURE**

5.1 General

- 5.1.1 The grading of activities performed by CBFO ensures that work activity controls are consistent with the importance of the activity to nuclear safety, the isolation or containment of transuranic (TRU) waste, and the achievement of other CBFO mission objectives.
- 5.1.2 The assignment of QLs shall be completed prior to the performance of the work activity.

5.2 Grading Activities for Application of QA Controls

- 5.2.1 The CBFO Manager, AM, and Office Directors shall identify work activities to be performed within their area of responsibility. These work activities may be determined by utilizing the CBFO WBS elements, along with applicable program documents such as CBFO policy letters, roles and responsibilities, position descriptions, and the CBFO QAPD. The initiator will first check with the QAM prior to initiating the graded approach process for activities to determine if QA applicability has been previously determined.

**NOTE: Determination of QLs for CBFO is based on whether the activity is performed by CBFO staff. CBFO oversight of a QL-1 activity should be graded as QL-2.**

- 5.2.2 If QA applicability has not previously been determined or there have been changes to the activity, the initiator will determine QA applicability in accordance with this procedure. Using the quality level determination instructions on the Quality Level Determination Form (Attachment 1) available on the CBFO Intranet, determine the QL

for the new or revised activity. The initiator will submit the proposed change to the QAM for incorporation into the CBFO master Quality Level Determination Form (Attachment 1).

- 5.2.3 The QAM will route the revised master Quality Level Determination Form to the Office Directors, Assistant Manager for Operations, and Manager for review and approval signatures.
- 5.2.4 If the Office Directors, Assistant Manager, Manager, or QAM does not concur with the proposed change, the initiator is notified of the issue requiring resolution. The initiator will resolve the issue; the QAM will revise the master Quality Level Determination Form, if applicable. The Quality Level Determination Form then will be sent back through the review and approval process.
- 5.2.5 If approval is given, the QAM will incorporate the master Quality Level Determination Form into the record and have the updated form posted to the CBFO Intranet.
- 5.2.6 Any time the WBS is updated, the master Quality Level Determination Form shall be reviewed for any changes to the form. The QAM will send the master Quality Level Determination Form out for review in accordance with MP 4.2, *Document Review*. After changes are made to the master Quality Level Determination Form, the QAM will send it to the appropriate individuals for review and approval signatures.

### 5.3 Quality Levels

- 5.3.1 The QAM will consolidate and maintain the master Quality Level Determination Form and distribute it to all CBFO staff.
- 5.3.2 If work activities are designated as QL1, then CBFO staff are responsible for the use of applicable MPs.
- 5.3.3 CBFO staff are responsible for the use of good management and engineering practices for work activities designated as QL2 and may elect to utilize MPs for any work activity designated as QL2.

## 6.0 **RECORDS**

The Quality Level Determination Form (Attachment 1) is a non-permanent QA record generated by this procedure, and will be processed in accordance with current CBFO records management procedures.

## 7.0 **ATTACHMENTS**

Attachment 1- Quality Level Determination Forms and Quality Level Determination Questions

### Example of the Quality Level Determination Form

| WBS   | DESCRIPTION   | QL 1                     | QL 2                     |
|-------|---|--------------------------|--------------------------|
| 1.1.1 | SRS   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.1.2 | LANL  | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.1.3 | Hanford   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.1.4 | SQS   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.1.5 | RFETS   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.1.6 | INL   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.1.7 | ORNL  | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.1.8 | Waste Services Support                                      | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.2.1 | Waste Disposal  | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.2.2 | Facility Projects   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.2.3 | 40 CFR 191/194 Compliance                                   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.2.4 | RCRA Compliance   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.2.5 | Other Environmental Compliance Programs                     | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.2.6 | Disposal Support  | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.3.1 | Type A Packaging Design and Fabrication                     | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.3.2 | Type B Packaging Design, Fabrication, and NRC Certification | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.3.3 | Repackaging Units   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.3.4 | Corporate Board Strategic Projects                          | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.4.1 | Quality Assurance Program                                   | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.4.2 | Administrative Programs                                     | <input type="checkbox"/> | <input type="checkbox"/> |
| 1.5.1 | Dismantlement & Decommissioning Phase                       | <input type="checkbox"/> | <input type="checkbox"/> |
| 2.1.1 | XENON   | <input type="checkbox"/> | <input type="checkbox"/> |
| 2.1.2 | SEGA-MEGA   | <input type="checkbox"/> | <input type="checkbox"/> |
| 2.1.3 | OMNISita  | <input type="checkbox"/> | <input type="checkbox"/> |
| 2.1.4 | Low Dose Radiation Biology                                  | <input type="checkbox"/> | <input type="checkbox"/> |

Concurrence: \_\_\_\_\_ Date \_\_\_\_\_  
CBFO Quality Assurance Manager

Concurrence: \_\_\_\_\_ Date \_\_\_\_\_  
CBFO Assistant Manager of Operations

Concurrence: \_\_\_\_\_ Date \_\_\_\_\_  
Office Director, CBFO Office of Site Operations

Concurrence: \_\_\_\_\_ Date \_\_\_\_\_  
Office Director, CBFO Office of the National TRU Program

Concurrence: \_\_\_\_\_ Date \_\_\_\_\_  
Office Director, CBFO Office of Business

### Determination of QA Grading Level Questions

Does CBFO staff directly perform the activities covered by the WBS element? If not, then the activity should be graded a QL 2.

If CBFO staff directly performs the activities covered by the WBS element, then the following questions shall be considered. If any of these questions apply, then the activity is a QL 1; mark an "X" in the QL 1 column. If none of the questions apply, then place an "X" in the QL 2 column.

1. Does the activity affect nuclear safety for protection of CBFO, contractors, or the public?
2. Does the activity affect characterization, certification, packaging, or transportation requirements as delineated in the WIPP HWFP or WAC?
3. Does the activity affect compliance with 40 CFR 191 or 194 in any of the following areas?
  - Waste characterization activities and assumptions;
  - Environmental monitoring, monitoring of the performance of the disposal system, and sampling and analysis activities;
  - Field measurements of geologic factors, groundwater, meteorologic, and topographic characteristics;
  - Computations, computer codes, models and methods used to demonstrate compliance with the disposal regulations;
  - Expert judgment elicitation used to support applications for certification or recertification of compliance;
  - Design of the disposal system and actions taken to ensure compliance with design specifications;
  - The collection of data and information used to support compliance application(s); and
  - Other systems, structures, components, and activities important to the containment of waste in the disposal system.
4. Is the activity related to Nuclear Regulatory Commission (NRC) licensed packaging (e.g., Transuranic Package Transporter Model II [TRUPACT-II], RH-72B, CNS 10-160B), design, purchase, fabrication, handling, shipping, storage, cleaning, assembly, inspection, testing, operation, maintenance, repair, and modification or components of packaging that are important to safety?