

**INSPECTION TECHNICAL PROCEDURE**

**I-132**

**IDENTIFICATION AND CONTROL OF ITEMS AND PROCESSES  
PROGRAM INSPECTION**

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# **INSPECTION TECHNICAL PROCEDURE I-132, REV. 3 IDENTIFICATION AND CONTROL OF ITEMS AND PROCESSES PROGRAM INSPECTION**

## **1.0 PURPOSE**

This inspection procedure provides the WTP Safety Regulation Division (OSR) inspector guidance to assess the Contractor's procedures and processes for controlling the identification, handling, and storage of important-to-safety items, including nonconforming items. This procedure is based on the requirements set forth in 10 CFR 830, Subpart A, "Quality Assurance Requirements," and the Contractor's Quality Assurance Manual (QAM). Specifically, this procedure addresses assessment of the adequacy and effectiveness of the following:

- Identification, traceability, and control of items
- Handling, storage, and shipping processes
- Control of special processes
- Control of measuring and test equipment (M&TE).

## **2.0 OBJECTIVES**

The objective of this inspection procedure is for the OSR to verify the Contractor's processes for identifying and controlling items are according to the QAM and applicable implementing procedures. The inspection should verify the Contractor's process for identifying items include requirements for specifying the identification of items, maintaining traceability of items, and controlling items with limited shelf-life. The inspection should verify the Contractor's process for controlling, handling, storing, and shipping ensures items are controlled to prevent damage or loss and to minimize deterioration.

The inspection should verify the Contractor's process for controlling special processes includes requirements for controlling the equipment and instrumentation used in performing special processes, as well as the qualifications for personnel performing the special processes. The inspection should verify the Contractor's process for controlling MT&E includes requirements for ensuring that M&TE is calibrated and adjusted at specific periods to maintain accuracy within specified limits and that the calibration standards used are traceable to nationally or internationally recognized standards.

This inspection procedure was designed as a component of a complete construction inspection program. This inspection procedure and others will be used, as needed, to ensure construction activities are being conducted as required by authorization basis commitments and Contractor procedures. During the construction phase, a significant portion of this inspection procedure is expected to be accomplished at least once for each major Contractor/subcontractor involved with the activities covered by this procedure. The entire procedure is not expected to be completed during any one inspection and/or every time the inspection procedure is used.

### **3.0 INSPECTION REQUIREMENTS**

#### **3.1 Identification and Control of Items**

The inspector should perform the following activities:

- 3.1.1 Verify identification is maintained on the items or in documents traceable to the items, or in a manner which assures identification is established and maintained. (QAM Policy Q-08.1, Section 3.2.1)
- 3.1.2 Verify items are identified from the initial receipt and fabrication of items up to and including installation or use, and identification related an item to an applicable design or other pertinent specifying document. (QAM Policy Q-08.1, Section 3.2.2)
- 3.1.3 Verify physical identification is used to the maximum extent possible. (QAM Policy Q-08.1, Section 3.3.1)
- 3.1.4 Verify when physical markings are either impractical or insufficient, other measures are employed (i.e., physical separation, labels, or tags attached to containers, or procedural control). (QAM Policy Q-08.1, Section 3.3.2)
- 3.1.5 Verify identification markings are applied using materials and methods which provide a clear and legible identification, and do not degrade the function or service life of the item. (QAM Policy Q-08.1, Section 3.3.3)
- 3.1.6 Verify markings are transferred to each part of an identified item when subdivided and are not obliterated or hidden by surface treatment or coating unless other means of identification are substituted. (QAM Policy Q-08.1, Section 3.3.4)
- 3.1.7 Verify when codes, standards, or specifications included specific identification or traceability requirements (i.e., identification or traceability of the item to applicable specification and grade of material; heat, batch, lot, part, or serial number; or specified inspection, test, or other records), the program provides such identification and traceability control. (QAM Policy Q-08.1, Section 3.4.1)
- 3.1.8 Verify items having a limited calendar or operating life or cycles are identified and controlled to preclude use of items whose shelf life or operating life had expired. (QAM Policy Q-08.1, Section 3.5)
- 3.1.9 Verify the Contractor's provisions for the control of item identification consistent with the planned duration and conditions of storage include the following:
  - Provisions for maintenance or replacement of markings and identification records due to damage during handling or aging
  - Protection of identifications on items subject to excessive deterioration due to environmental exposure

- Provisions for updating existing plant records or related documentation. (QAM Policy Q-08.1, Section 3.6)

3.1.10 Verify the Contractor's item identification methods for QARD-related items ensure traceability is established and maintained in a manner that allows an item to be traced to applicable design or other specifying documents. (QAM Policy Q-08.1, Section 4.1)

3.1.11 Verify the Contractor's item traceability documentation for QARD-related items ensured the item can be traced at all times from its source through installation or end use. (QAM Policy Q-08.1, Section 4.2)

3.1.12 Verify if codes or standards did not include specific identification or traceability requirements, specifications specified identification and traceability methods appropriate to the QARD-related item. (QAM Policy Q-08.1, Section 4.3)

## **3.2 Handling, Storing, and Shipping Important-to-Safety Items**

The inspector should perform the following activities:

3.2.1 Verify the Contractor's procedures describe handling, storage, cleaning, packaging, shipping, and preservation of items to prevent damage or loss and to minimize deterioration, and these procedures are implemented. (QAM Policy Q-13.1, Section 3.1.1)

3.2.2 Verify the Contractor had developed specific procedures to use when required for critical, sensitive, perishable, or high-value items. (QAM Policy Q-13.1, Section 3.1.2)

3.2.3 Verify special equipment (e.g., shock absorbers and accelerometers) and special protective environments (e.g., inert gas atmosphere, specific moisture content levels, and temperature levels) are specified and in procedures, when needed, and verify their existence. (QAM Policy Q-13.1, Section 3.2.1)

3.2.4 Verify the Contractor utilizes and controls special handling tools and equipment where necessary to ensure safe and adequate handling. (QAM Policy Q-13.1, Section 3.2.2)

3.2.5 Verify the Contractor inspects and tests special handling tools and equipment periodically, or prior to use, as necessary to ensure performance. (QAM Policy Q-13.1, Section 3.2.3)

3.2.6 Verify the operators of special handling and lifting equipment are experienced or trained to use the equipment. (QAM Policy Q-13.1, Section 3.2.4)

3.2.7 Verify the Contractor inspects and tests special handling tools and equipment at specified time intervals and in accordance with implementing documents to verify the tools and equipment were adequately maintained. (QAM Policy Q-13.1, Section 3.2.5)

- 3.2.8 Verify the Contractor had established measures for marking and labeling for the packaging, shipping, handling, and storage of items as necessary to adequately identify, maintain, and preserve the item. (QAM Policy Q-13.1, Section 3.3.1)
- 3.2.9 Verify markings and labels indicate the presence of special environments or the need for special controls, if necessary. (QAM Policy Q-13.1, Section 3.3.2)

### **3.3 Controlling Special Processes**

The inspector should perform the following activities:

- 3.3.1 Verify special processes that control or verify quality are performed by qualified personnel using approved procedures in accordance with specified requirements. (QAM Policy Q-09.1, Section 3.1.1)
- 3.3.2 Verify the Contractors provisions for controlling special processes include instructions, procedures, drawings, checklists, travelers, or other appropriate means, and these means assure that process parameters were controlled and specified environmental conditions are maintained. (QAM Policy Q-09.1, Section 3.1.2)
- 3.3.3 Verify special process instructions include or reference procedure, personnel, and equipment qualification requirements. (QAM Policy Q-09.1, Section 3.1.3)
- 3.3.4 Verify special process instructions included or referenced conditions necessary for accomplishment of the process, including proper equipment, controlled parameters of the process, specified environment, and calibration requirements. (QAM Policy Q-09.1, Section 3.1.4)
- 3.3.5 Verify requirements of applicable codes and standards, including acceptance criteria, for the process are specified or referenced in procedures or instructions. (QAM Policy Q-09.1, Section 3.1.5)
- 3.3.6 Verify special processes not covered by existing codes and standards, or where quality requirements specified exceed those of existing codes or standards, the necessary requirements for qualification of personnel, procedures, or equipment are specified or referenced in procedures or instructions. (QAM Policy Q-09.1, Section 3.1.6)
- 3.3.7 Verify the organization performing the special process adhered to the approved procedures or processes; and qualification of personnel, procedures, and equipment comply with specified requirements. (QAM Policy Q-09.1, Section 3.1.7)
- 3.3.8 Verify the Contractor had established implementing documents for the control and administration for the training, examination, and certification of nondestructive examination personnel in accordance with Policy Q-02.2, *Personnel Training and Qualification*. (QAM Policy Q-09.1, Section 3.1.9)

- 3.3.9 Verify the Contractor's processes to be controlled as special processes meet the following criteria:
- The results are highly dependent upon the control of the process; or
  - The results are highly dependent upon the skill of the operator; and
  - The quality of the results cannot be readily determined by inspection or test of the item. (QAM Policy Q-09.1, Section 4.1)
- 3.3.10 Verify the Contractor established and maintains a list of the special processes that each affected organization will perform, and the list is based on the criteria specified in Section 3.3.9 above. (QAM Policy Q-09.1, Section 4.2)
- 3.3.11 Verify the Contractor's special process implementing documents included or referenced the conditions necessary for accomplishing the special process, including traceability between the item or product and individual performing the special process. (QAM Policy Q-09.1, Section 4.3)

### **3.4 Control of Measuring and Test Equipment**

The inspector should perform the following activities:

- 3.4.1 Verify the Contractor considers measuring and test equipment (M&TE) to include instruments or equipment used for testing, inspection, calibration of other instruments, process verification, or data collection for purposes of determining compliance with requirements. (QAM Policy Q-12.1, Section 3.1.1)
- 3.4.2 Verify tools, gauges, instruments, and other M&TE used for activities affecting quality are properly handled and stored, calibrated at specific intervals, and adjusted and maintained to required accuracy limits. (QAM Policy Q-12.1, Section 3.1.2)
- 3.4.3 Verify the Contractor ensured selected M&TE are of a proper type, range, accuracy, and tolerance to accomplish the function of determining conformance to requirements. (QAM Policy Q-12.1, Section 3.1.3)
- 3.4.4 Verify M&TE, including equipment that contains software or programmable hardware, is calibrated as a unit at prescribed intervals, software changes, or prior to use. (QAM Policy Q-12.1, Section 3.2.1)
- 3.4.5 Verify M&TE is calibrated against reference calibration standards having traceability to nationally recognized standards. [Note: If no nationally recognized standard or physical constants exist, the basis for calibration shall be documented.] (QAM Policy Q-12.1, Section 3.2.1)

- 3.4.6 Verify calibration checks are performed both before and after use for M&TE used in one-time only applications. (QAM Policy Q-12.1, Section 3.2.2)
- 3.4.7 Verify calibration standards have a greater accuracy than the required accuracy of the M&TE being calibrated. (QAM Policy Q-12.1, Section 3.2.3)
- 3.4.8 Verify the Contractor has defined the method and interval of calibration for each device, based on the type of equipment, stability characteristics, required accuracy, intended use, and other conditions affecting measurement control. (QAM Policy Q-12.1, Section 3.2.4)
- 3.4.9 Verify the Contractor performs a calibration or calibration check when the accuracy of calibrated M&TE is suspect. (QAM Policy Q-12.1, Section 3.2.5)
- 3.4.10 Verify the Contractor's calibrated M&TE is labeled, tagged, or otherwise suitably marked or documented to indicate due date or interval of the next calibration. (QAM Policy Q-12.1, Section 3.2.6)
- 3.4.11 Verify the calibrated M&TE was uniquely identified to provide traceability to its calibration data. (QAM Policy Q-12.1, Section 3.2.7)
- 3.4.12 Verify the Contractor's procedures specify updates to software contained in M&TE affecting calibration require re-calibration of the equipment prior to use. (QAM Policy Q-12.1, Section 3.2.8)
- 3.4.13 Verify the use of M&TE is documented, including the processes monitored, data collected, or items inspected or tested since the last calibration. (QAM Policy Q-12.1, Section 3.3.1)
- 3.4.14 Verify M&TE is considered to be out-of-calibration and not be used until calibrated if any of the following conditions exist:
- The calibration due date or interval has passed without re-calibration;
  - The device produces results known to be in error. (QAM Policy Q-12.1, Section 3.4.1)
- 3.4.15 Verify Out-of-calibration M&TE is controlled, and that the controls include the following:
- Out-of-calibration M&TE is tagged, segregated, or otherwise controlled to prevent use until it has been recalibrated.
  - When M&TE is found out of calibration during recalibration, the validity of results obtained using that equipment since its last valid calibration is evaluated.

- The evaluation includes the determination of acceptability for previously collected data, processes monitored, or items previously inspected or tested.
- The evaluation is documented. (QAM Policy Q-12.1, Section 3.4.2)

3.4.16 Verify if any M&TE is consistently found out-of-calibration during the recalibration process, it is repaired or replaced. (QAM Policy Q-12.1, Section 3.4.3)

3.4.17 Verify when M&TE is lost, the validity of results obtained using that equipment since its last valid calibration is evaluated.

- The evaluation must include the determination of acceptability for previously collected data, processes monitored, or items previously inspected or tested.
- The evaluation must be documented. (QAM Policy Q-12.1, Section 3.5.1)

3.4.18 Verify the Contractor maintains M&TE calibration documentation including the following information in accordance with Policy Q-17.1, *Quality Assurance Records*:

- Identification of the M&TE calibrated.
- Traceability to the calibration standard used for calibration.
- Calibration data.
- Identification of the individual performing the calibration.
- Identification of the date of calibration and the recalibration due date or interval.
- Results of the calibration and statement of acceptability.
- Reference to any actions taken in connection with out-of-calibration or nonconforming M&TE including evaluation results.
- Identification of the implementing document (including revision level) used in performing the calibration. (QAM Policy Q-12.1, Section 3.6.1)

## **4.0 INSPECTION GUIDANCE**

For each area listed below, the inspector should review the Contractor's QAM, policies, and procedures for various methods for identifying and controlling items, services, and processes; review objective evidence of implementation of the QAM, policies, and procedures; and interview personnel responsible for identifying and controlling items, services, and processes. In

addition to reviewing 10 CFR 830, Subpart A, and applicable parts of the QAM, the inspector should also review the *DOE Implementation Guidance for 10 CFR 830.120* (G-830.120-REV 0).

Suggested sample sizes are included in some of the inspection elements below. However, the inspector should use judgment in selecting a different sample size based on the status of the construction activities or on the initial observations in any area. The samples should be large enough to provide confidence that: (1) the Contractor has approved procedures, (2) the procedures are being implemented, and (3) the personnel are properly qualified for the work they are performing. The intent is to establish a high level of assurance that the end product meets requirements.

#### **4.1 Identification and Control of Items**

The inspector should perform the following activities:

- 4.1.1 Select and review a minimum of three items to confirm identification was maintained on the items, or in documents traceable to the items, or in a manner establishing and maintaining identification.
- 4.1.2 Review the three items selected in Section 4.1.1 above to confirm the items were identified from the initial receipt and fabrication of items up to and including installation or use. The inspectors should confirm the identification related to an applicable design or other pertinent specifying document.
- 4.1.3 Select and review a minimum of three items of varying shapes and sizes to confirm physical identification is used whenever possible.
- 4.1.4 Select and review a minimum of three items where physical markings were either impractical or insufficient to confirm other methods were employed (i.e., physical separation, labels, or tags attached to containers, or procedural control).
- 4.1.5 Review the items selected in Section 4.1.1 to confirm identification markings are applied using materials and methods which provided a clear and legible identification, and do not degrade the function or service life of the item.
- 4.1.6 Select and review a minimum of three items that had been subdivided to confirm traceability of each part to the whole item. The inspectors should confirm the markings have been transferred to each part of an identified item, and the markings are not obliterated or hidden by surface treatment or coating.
- 4.1.7 Observe a minimum of three examples of control of items of the type mentioned in Section 3.1.7 and confirm identification. The inspectors should confirm when codes, standards, or specifications included specific identification or traceability requirements the Contractor's program provided such identification and traceability control.

- 4.1.8 Select and observe a minimum of three limited shelf life items to confirm the shelf or operating life had not expired.
- 4.1.9 Review the Contractor's procedures for item identification to confirm control provisions are consistent with the planned duration and conditions of storage, and that the storage conditions included those listed in Section 3.1.9 of this procedure.
- 4.1.10 Review the Contractor's implementing procedures for identification of confirm they included methods for ensuring traceability was maintained in a manner allowing an item to be traced to applicable design or other specifying documents. The inspectors should select and review a minimum of three Quality Assurance Requirements and Description (QARD)-related items to confirm traceability to design or other applicable documents.
- 4.1.11 Review the three QARD-related items selected above to confirm the items can be traced at all times from its source through installation or end use.
- 4.1.12 Review three QARD-related items where codes or standards do not include specific identification or traceability requirements to confirm their specifications specified identification and traceability methods appropriate to the item.

## **4.2 Handling, Storing, and Shipping Important-to-Safety Items**

The inspector should perform the following activities:

- 4.2.1 Review the Contractor's procedures for handling, storing, and shipping, and confirm the procedures are implemented.
- 4.2.2 Interview Contractor personnel to determine which items are considered to be critical, sensitive, perishable, or high-value, and review the procedures governing their control.
- 4.2.3 Review the Contractor's procedures to confirm they include special equipment (e.g., shock absorbers and accelerometers) and special protective environments (e.g., inert gas atmosphere, specific moisture content levels, and temperature levels). The inspectors should review the Contractor's special equipment and special protective environments to confirm the procedures are properly implemented.
- 4.2.4 Review the Contractor's a minimum of three special handling tools and equipment to confirm they are used and controlled to ensure safe and adequate handling.
- 4.2.5 Review the Contractor's documentation to confirm the special handling tools and equipment had been inspected and tested periodically, or prior to use, to ensure performance. The inspectors should review the Contractor's procedures for special handling tools and equipment to confirm they had been inspected, maintained, and tested in accordance with the procedures.

- 4.2.6 Review qualification packages for a minimum of three operators to confirm they have been trained on the equipment they were operating.
- 4.2.7 See Section 4.2.5 above.
- 4.2.8 Review the Contractor's handling, storage, and shipping procedures to confirm they contain measures for marking and labeling for the packaging, shipping, handling, and storage of items as necessary to adequately identify, maintain, and preserve the item.
- 4.2.9 Review item markings and labels for indication of special environments or the need for special controls.

### **4.3 Controlling Special Processes**

The inspector should perform the following activities:

- 4.3.1 Review a minimum of three qualification packages for personnel performing special processes. The inspectors should select and review a minimum of three special processes to confirm the individuals who performed them were qualified in accordance with the approved qualification procedures.
- 4.3.2 Review the Contractor's procedures controlling special processes to confirm they discuss the provisions to be used to control special processes (i.e., instructions, procedures, drawings, checklists, travelers), and specific environmental conditions were maintained.
- 4.3.3 Review the Contractor's procedures controlling special processes to confirm they included or referenced procedure, personnel, and equipment qualification requirements.
- 4.3.4 Review the Contractor's procedures controlling special processes to confirm they included or referenced conditions necessary for accomplishment of the process, including proper equipment, controlled parameters of the process, and calibration requirements.
- 4.3.5 Review the Contractor's procedures controlling special processes to confirm they include requirements of applicable codes and standards, including acceptance criteria, for the process were specified or referenced.
- 4.3.6 Review the Contractor's procedures controlling special processes to confirm they specify necessary requirements for qualification of personnel, procedures, or equipment for special processes not covered by existing codes and standards, or where quality requirements specified exceed those of existing codes or standards.
- 4.3.7 Select and review a minimum of three special processes to confirm they adhere to the approved procedures or processes, the personnel are qualified, and the equipment comply with the approved procedures.

- 4.3.8 Review the Contractor's implementing documents to confirm they specify control and administration for the training, examination, and certification of nondestructive examination personnel in accordance with Policy Q-02.2, *Personnel Training and Qualification*. The inspectors should select and review the training, examination, and certification records for a minimum of three nondestructive examination personnel to confirm they comply with Policy Q-02.2.
- 4.3.9 Interview the Contractor's personnel to determine what processes the Contractor considers to be special processes. The inspectors should compare these processes with the criteria provided in Section 3.3.9 of this procedure.
- 4.3.10 Interview the Contractor's personnel to confirm a list of special processes had been established and maintained.
- 4.3.11 Review the Contractor's implementing documents for special processes to confirm they include or reference the conditions necessary for accomplishing the special process, including traceability between the item or product and individual performing the special process. The inspectors should select a minimum of three records of special processes to confirm the item or product and individual performing the special process was traceable.

#### **4.4 Control of Measuring and Test Equipment**

The inspector should perform the following activities:

- 4.4.1 Review the Contractor's M&TE listing or interview Contractor personnel to determine which equipment the Contractor considers to be M&TE.
- 4.4.2 Review the Contractor's calibration records for a minimum of three of the M&TE listed or identified by the Contractor to determine that they are properly handled and stored, calibrated at specific intervals, and adjusted and maintained to required accuracy limits.
- 4.4.3 Review the Contractor's M&TE listing or interview Contractor personnel to confirm the M&TE are of a proper type, range, accuracy, and tolerance to accomplish the function of determining conformance to requirements.
- 4.4.4 Review the Contractor's calibration records for the M&TE selected in Section 4.4.2 above to confirm the M&TE, including equipment that contained software or programmable hardware, is calibrated as a unit at prescribed intervals, at software changes, or prior to use.
- 4.4.5 Review the Contractor's calibration records for the M&TE selected in Section 4.4.2 above to confirm the calibrations are performed against reference calibration standards having traceability to nationally recognized standards. If no nationally recognized standard or physical constants exist, the inspectors should confirm the basis for calibration is documented.

- 4.4.6 Review the Contractor's calibration records for a minimum of three M&TE used in one-time only applications to confirm calibration checks are performed both before and after use.
- 4.4.7 Select and review the Contractor's records for a minimum of three calibration standards to confirm they have a greater accuracy than the required accuracy of the M&TE being calibrated.
- 4.4.8 Interview the Contractor's personnel who define the method and interval of calibration for each M&TE to confirm they are based on the type of equipment, stability characteristics, required accuracy, intended use, and other conditions affecting measurement control.
- 4.4.9 Review the Contractor's records for calibrated M&TE when their accuracy was suspect to confirm the Contractor have performed a calibration or calibration check.
- 4.4.10 Select and review a minimum of three calibrated M&TE to confirm it is labeled, tagged, or otherwise suitably marked or documented to indicate due date or interval of the next calibration.
- 4.4.11 Review the M&TE selected in Section 4.4.10 above to confirm it is uniquely identified to provide traceability to its calibration data.
- 4.4.12 Review the Contractor's procedures for calibration of M&TE to confirm they specify that updates to software contained in M&TE that affect calibration require re-calibration of the equipment prior to use.
- 4.4.13 Review the Contractor's records of M&TE usage to confirm the processes monitored, data collected, or items inspected since the last calibration was documented.
- 4.4.14 Review a minimum of three M&TE that had passed the due date for re-calibration and/or had produced results known to be in error to determine whether the Contractor had identified and controlled them as out-of-calibration and had not used them.
- 4.4.15 Select and review a minimum of three out-of-calibration M&TE to confirm it is controlled, including tagging, segregating, or otherwise controlling, to prevent use until they have been calibrated. The inspectors should review a minimum of three examples of M&TE found to be out of calibration during re-calibration to confirm the validity of results obtained using that equipment since its last valid calibration was evaluated. The inspectors should confirm the evaluation was documented, and included the determination of acceptability for previously collected data, processes monitored, or items previously inspected or tested.
- 4.4.16 Review the Contractor's calibration records to confirm any M&TE found consistently out of calibration during the re-calibration process is repaired or replaced.

- 4.4.17 Review the Contractor's calibration records to confirm when M&TE is lost the validity of results obtained using that equipment since its last valid calibration is evaluated. The inspectors should confirm the evaluation is documented, and included the determination of acceptability for previously collected data, processes monitored, or items previously inspected or tested.
- 4.4.18 Select the records of a minimum of three M&TE records to confirm they are maintained within the Contractor's records management system. The inspectors should confirm the information listed in Section 3.4.18 of this document is contained in the records for each of the three M&TE selected.

## **5.0 REFERENCES**

10 CFR 830, Subpart A, *Code of Federal Regulations*, "Quality Assurance Requirements," as amended.

*DOE Implementation Guide for Use With 10 CFR 830.120*, "Quality Assurance," G-830.120-REV. 0, U.S. Department of Energy, 1994.

DOE/RW-0333P, *Quality Assurance Requirements and Description (QARD)*, Revision 11.

*Quality Assurance Manual*, 24590-WTP-QAM-QA-01-001, Revision 4, Bechtel National, Inc., 2003.

## **6.0 LIST OF TERMS**

M&TE	measuring and test equipment
OCRWM	Office of Civilian Radioactive Waste Management
OSR	WTP Safety Regulation Division
QAM	Quality Assurance Manual
QARD	Quality Assurance Requirements and Description