



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

May 16, 2016

CERTIFIED MAIL

Mr. Jacob Marx
Project on Government Oversight
1100 G Street Northwest
Washington, DC 20001

Dear Mr. Marx:

FREEDOM OF INFORMATION ACT REQUEST (FOI 2016-00553)

This is in response to the request for information that you sent to the U.S. Department of Energy (DOE), Headquarters Freedom of Information Act (FOIA) office seeking the following:

1. The most recent Corrective Action Program for the Waste Treatment Plant (WTP) at the Hanford Site;
2. DOE's October 2015 Managed Improvement Plan Health Check report on Corrective Action Program backlogs; and
3. Bechtel National Inc.'s 2014 self-assessment of its work on the WTP.

Your request has been forwarded to this office for a response and was received on February 26, 2016. In response to Item 1, enclosed is a copy of 24590-WTP-PD-RACA-CR-0100, Revision 0 entitled, "Corrective Action Management Program Description" dated December 22, 2014.

We continue to search and review documents responsive to Items 2 and 3 of your request. As you may know, the FOIA provides that an agency respond to requests within twenty working days. However, the FOIA permits an agency to extend the time limit to respond to a request in certain circumstances. These circumstances include the need to collect records from other locations, review large number of records, and consult with other offices. Due to the subject matter of the documents requested, we are required to consult with other offices and review the documents for any FOIA exemptions that may apply before the documents may be released. Therefore, additional time is needed for your request and we require an extension. At this time we estimate your response being complete within four to five weeks. We will work with you to provide frequent communication (either by letter or e-mail) regarding the status of your request and will provide interim responses to you as documents become available.

Mr. Jacob Marx

-2-

May 16, 2016

If you have any questions regarding your request, please contact me at our address above or on (509) 376-6288.

Sincerely,

-Original Signed By-

Dorothy Riehle
Freedom of Information Act Officer
Office of Communications
and External Affairs

OCE:DCR

Enclosure



Electronic documents, once printed, are UNCONTROLLED and may become outdated.
Refer to the electronic documents in InfoWorks for current revision.



Hanford Tank Waste Treatment and Immobilization Plant

Level of Use	Project Phase	Applicability
N/A	All	Project Wide

Quality Affecting: No

24590-WTP-PD-RACA-CR-0100

Revision 0

Corrective Action Management Program Description

Effective Date: 12/22/2014

Requirement Area: Contractor Assurance

Reviewed By:

Debra J. Clarke
SME Name

Debra J. Clarke
Signature

12/21/14
Date

Approved By:

W. Scott Oxenford
RAM Approver Name

W. Scott Oxenford
Signature

12/21/14
Date

Contents

1.0 PURPOSE	4
2.0 ROLES AND RESPONSIBILITIES	4
3.0 REQUIREMENTS	6
4.0 PROGRAM DESCRIPTION ELEMENTS	6
4.1 Program Objective	6
4.2 Implementing Documents	7
4.3 Process Elements	7
5.0 REFERENCES	13

Attachments

Attachment 1 ACRONYMS and DEFINITIONS	15
Attachment 2 GUIDING PRINCIPLES	16
Attachment 3 INTEGRATED ISSUES MANAGEMENT PROCESSES	17
Attachment 4 REQUIREMENTS REFERENCE	19

Figures

FIGURE 1 CORRECTIVE ACTION MANAGEMENT PROCESS	9
--	----------

Electronic documents, once printed, are UNCONTROLLED and may become outdated.
Refer to the electronic documents in InfoWorks for current revision.

Corrective Action Management Program Description

24590-WTP-PD-RACA-CR-0100, Rev 0

Level of Use: N/A

REVISION – SUMMARY

Justification:

Page(s)	Description
	Initial issue. This program description supersedes 24590-WTP-GPP-MGT-043 in part and addresses 24590-WTP-PIER-MGT-14-1297-C.

1.0 PURPOSE

This program description establishes the Hanford Tank Waste Treatment and Immobilization Plant (WTP) Corrective Action Management Program (CAMP) as a subcomponent of the Contractor Assurance requirement area.

This program description illustrates the CAMP and establishes roles, responsibilities, accountabilities, and authorities, including the establishment of key interfaces with other business processes. Implementation of CAMP is via procedures and guides alphanumerically identified by "RACA-CR."

WTP has chosen to use ActionWay™, a DevonWay Solution product, as the electronic CAMP System. Conditions / issues are identified and entered in ActionWay™ for resolution and trending as Condition Reports (CR). The CR replaces project issues evaluation reports (PIER), effective with Revision 0 of this Program Description.

This program description does not establish program requirements. However, it does define the control and allocation of existing program requirements, as well as the general approach to requirement implementation. It further describes the interfaces with other business systems that have been identified as a component of the integrated issues management approach (see Attachment 3).

2.0 ROLES AND RESPONSIBILITIES

2.1 Project Director

- Provides sufficient resources and monitors effective implementation of the CAMP as part of the WTP Quality Management System

2.2 Manager of Organizational Effectiveness

- Performs as the Requirement Area Manager, in accordance with the Requirements Management Program, including: requirements flow-down, interpretive authority for the CAMP, program performance monitoring, and periodic program assessment

2.3 Corrective Action Management Program Manager

- Develops and manages processes to implement the Integrated Issues Management Policy and the CAMP
- Provides routine oversight of CAMP implementation
- Interfaces with management and line personnel to communicate expectations and address process questions
- Maintains the Electronic CR System

2.4 Managers and Supervisors

- Monitor and ensure effective CAMP implementation, including cross-functional support when warranted
- Ensure cause evaluations are provided sufficient resources for timely and effective corrective action plan development
- Promote a culture that values timely and effective issue identification and resolution
- Ensure the adequacy and quality of evaluations and closure documentation in accordance with CAMP procedures
- Engage in problem identification, considering the need for compensatory actions, stop work, or prompt investigation
- Ensure compensatory actions are promptly implemented
- Ensure Quality is notified of progress of evaluations and corrective actions for Quality-initiated CRs
- Ensure Price-Anderson Amendments Act / Regulatory Interface is notified of progress of evaluations and corrective actions for externally identified CRs
- Ensure appropriate CR significance level

2.5 Compliance Review Point of Contact

- Reviews CRs when a compliance review is determined to be warranted

2.6 External Interface Point of Contact

- Reviews CRs when determined necessary

2.7 Price-Anderson Amendments Act Review Personnel

- Ensures CRs are reviewed for Noncompliance Tracking System reportability

2.8 Performance Improvement Review Boards

- Review cause evaluations and ensure associated corrective actions are effective, timely, and appropriately targeted to prevent recurrence of the condition or cause

2.9 Condition Report Review Committee

- Assigns the appropriate significance level for each CR generated
- Verifies the appropriate organization assignments for each CR generated

2.10 WTP Contractor Personnel and Subcontractors

- Identify any condition using the CR process; see 24590-WTP-GPP-RACA-CR-0110, *Condition Report Initiation*
- Notify management if the condition is known or suspected to involve an immediate threat to personnel safety, nuclear safety, equipment operability, equipment functionality, the environment, Project security, or is potentially reportable to an outside agency

3.0 REQUIREMENTS

24590-WTP-QAM-QA-06-001, *Quality Assurance Manual*

24590-WTP-PD-RACA-CA-0001, *WTP Contractor Assurance System Program Description*

The CAMP does not directly implement reportability requirements. The CAMP must, however, effectively interface with associated reportability processes. These processes include the following:

- 10 CFR Part 707, Energy: *Workplace Substance Abuse Programs at DOE Sites*
- 10 CFR Part 820, Energy: *Procedural Rules for DOE Nuclear Activities*
- 10 CFR Part 830, Energy: *Nuclear Safety Management*
- 10 CFR Part 835, Energy: *Occupational Radiation Protection*
- 10 CFR Part 850, Energy: *Chronic Beryllium Disease Prevention Program*
- 10 CFR Part 851, Energy: *Worker Safety and Health Program*
- DOE Order 232.2, Admin Change 1, *Occurrence Reporting and Processing of Operations Information*

4.0 PROGRAM DESCRIPTION ELEMENTS

4.1 PROGRAM OBJECTIVE

The nature of WTP's business mandates an extraordinary commitment to safety, quality, and continuous improvement. Self-critical behavior, problem identification, and problem resolution are vital to business success.

- The CAMP provides processes and tools used to identify, document, evaluate, prioritize, and resolve conditions.
- The CAMP fosters a learning culture through self-identification and correction / prevention of conditions and analysis for potential performance trends.

- The CAMP provides a structured issues management system as required by the Contractor Requirement Document DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*.¹

4.2 IMPLEMENTING DOCUMENTS

WTP conducts CAMP activities in accordance with approved implementing documents developed for the following areas:

- Documentation of conditions (See 24590-WTP-GPP-RACA-CR-0110, *Condition Report Initiation*)
- Categorization of conditions (See 24590-WTP-GPP-RACA-CR-0111, *Condition Report Screening*)
- Causal analysis and corrective action plan development (See 24590-WTP-GPP-RACA-CR-0112, *Condition Report Evaluation and Action Plan Development*)
- Corrective action implementation (See 24590-WTP-GPP-RACA-CR-0113, *Condition Report Action Response, Approval, Verification, and Closure*)
- Follow-up analysis to assure effectiveness of actions to prevent recurrence (See 24590-WTP-GPP-RACA-CR-0114, *Condition Report Effectiveness Review*)
- Change request activities (See 24590-WTP-GPP-RACA-CR-0115, *Condition Report Change Request Process*)
- Trend evaluation and reporting (See 24590-WTP-GPP-MGT-050, *Trend Reporting and Analysis*)

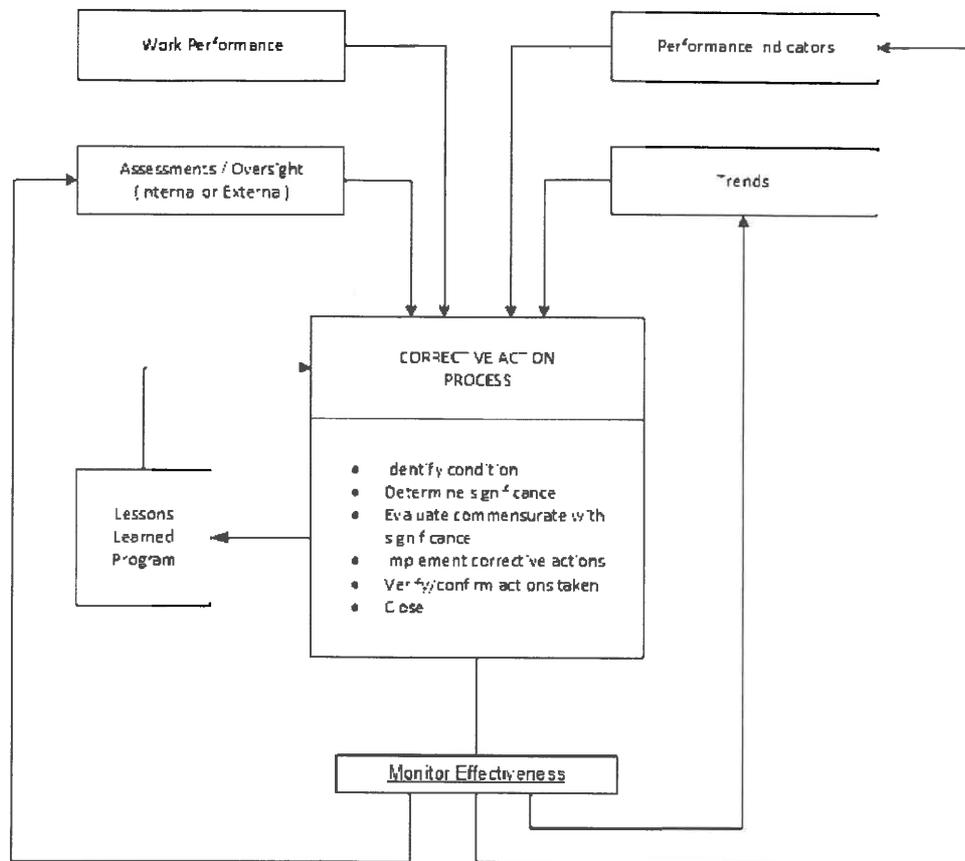
4.3 PROCESS ELEMENTS

4.3.1 Process Overview:

1. Conditions are identified through daily activities, including internal and external assessments, task assignments, or through self-revealing circumstances. Upon recognition, conditions are documented in accordance with CAMP implementing procedures (see Figure 1).
 - a. CAMP is used to identify, document, prioritize, assign responsibility for, evaluate, plan, and track actions required to resolve or correct conditions.
 - b. The process provides for the assignment of a significance level to the condition using a graded approach based on actual or potential consequences of the condition.

- c. The process provides for the identification of conditions adverse to quality for items or activities important to nuclear safety.
 - d. The process provides for a varied degree of rigor of causal analysis based on the significance of the condition, with the most rigor applied to the most significant CAQs.
 - e. Where appropriate, conditions are evaluated for extent of condition and extent of cause.
2. Follow-on processes add to the overall effectiveness of the CAMP. These processes include the following (see Figure 1):
- a. Individual conditions are evaluated for lessons learned to identify and share knowledge derived from experience.
 - b. Periodically, conditions are collectively evaluated and analyzed to identify trends that may not be readily apparent from evaluation of individual conditions.
 - c. Actions to prevent recurrence are evaluated for effectiveness through assessments and trending; and identified issues are entered in the CAMP for resolution.

FIGURE 1 CORRECTIVE ACTION MANAGEMENT PROCESS



4.3.2 Condition Identification

1. Anyone may initiate a CR. The CAMP is used to document and track resolution of conditions requiring management action. Submitting a CR should not be a substitute for proper communications. Initiators should discuss the condition with their supervisor or line management; supervisors or line management should discuss with impacted organization(s).
2. Conditions are identified and documented regardless of significance and consequence. WTP management has a stated intention to implement a low-threshold / high-volume CAMP.
3. Lower-tier tracking systems (e.g., supervisory watch program) used to manage work at the department level are periodically screened—as a component of overall CAMP effectiveness—such that CAQs that should have been reported in CAMP are appropriately identified.

4. Conditions are assigned significance levels using predetermined criteria based on actual or potential consequences relative to waste isolation, the authorization basis, the environment, personnel safety, or business impact (see 24590-WTP-GPP-RACA-CR-0111, *Condition Report Screening, Attachment 3*).
5. Ownership for resolution of the condition is assigned to appropriate management.

4.3.3 Trend-Only Conditions

1. Implementing procedures allow streamlined processing of low-consequence conditions that have either been corrected prior to Condition Report Review Committee screening or do not require corrective action (trend-only conditions).
 - a. Trend-only conditions require the initiator to document the condition and any action(s) taken to correct the condition. No further extent of condition or verification is required.
 - b. Trend-only conditions support the stated management expectation of a high-volume / low-threshold CAMP.
 - c. Trend-only conditions provide data necessary for early identification of trends.

4.3.4 Action Plan Development and Approval

1. Causal analysis is performed based upon the significance of the condition. The criteria for performance of cause analysis are provided in CAMP implementing documents. Responsible management may direct the performance of cause analysis.
 - a. The most rigorous causal analysis—root cause analysis—is applied to the most significant conditions. A qualified person is assigned to each root cause analysis.
 - b. Apparent cause evaluations are performed for conditions of lesser significance that warrant a cause evaluation and a corrective action plan likely to prevent recurrence of the condition. A qualified person is assigned to each apparent cause evaluation.
 - c. Conditions may be evaluated for direct cause.

2. Actions necessary to address the underlying causes of the condition are incorporated into the corrective action plan for significant conditions or when deemed appropriate by the manager responsible for the condition resolution.
3. Significant conditions are reviewed for extent of condition and extent of cause. Corrective action plans are developed and documented, including assignment of necessary corrective actions to address the identified condition, and are approved by appropriate management levels.

4.3.5 Action Plan Implementation

1. The assigned Responsible Manager and Responsible Person manage a condition to closure. When planned completion dates cannot be met, the Responsible Manager directs appropriate actions to modify the plan. For significant conditions, appropriate management endorses changes to planned completion dates.
2. When an action is completed, documented objective evidence is verified to exist. Any deviation from the closure criteria defined in the action plan is appropriately discussed and documented in the condition report, including coordination with assigned points-of-contact.

4.3.6 Condition Closure

1. When all actions in a plan are completed, the condition report is closed and verified, commensurate with the significance of the condition, to assure the condition has been resolved.
2. Effectiveness reviews are performed on actions taken to prevent recurrence for significant conditions at a time determined appropriate by the assigned manager.

4.3.7 CAMP Performance Monitoring

1. The CAMP Manager provides periodic reports to management on the performance of the Corrective Action Management Program.
2. Senior management meets routinely to review condition resolution progress, facilitate resolutions, analyze CAMP trends, and direct necessary actions.
3. Trending reviews are performed periodically with the purpose of identifying broader issues that may not be apparent from discrete problem resolution. Monitoring trends are documented within the trending review. Emerging trends and adverse trends are entered into the CAMP.

4.3.8 Nuclear Safety and Quality Culture

The CAMP implements the following Nuclear Safety and Quality Culture attributes:

1. Leadership
 - a. Encouraging open communication and fostering an environment free from retribution through CR initiation.
 - b. Risk-informed, conservative decision making through CR screening and risk-based extents of condition and cause.
 - c. Management engagement from CR initiation through corrective action completion and effectiveness reviews.
 - d. Communicating clear expectations and accountability for the identification and resolution of conditions.
2. Employee engagement
 - a. Mindful of hazards and controls and questioning what does not seem correct, followed by CR initiation, as needed.
3. Organizational learning
 - a. Reporting errors and problems through CR initiation.
 - b. Effective resolution of reported problems through analysis and corrective action development and implementation.
 - c. Use of industry experience to identify where improvements can be made.
 - d. Questioning attitude through management encouragement to question what does not seem right or if understanding is not clear for performing process evolutions.

4.3.9 Integrated Safety Management System

1. The CAMP directly supports Integrated Safety Management System core function 5, Provide Feedback and Continuous Improvement, through the identification and resolution of conditions.
2. Feedback information is gathered through CR initiation regarding the adequacy of processes and process implementation. Resolution is through risk determination from screening activities, which sets the stage for subsequent analysis, corrective action development, and action implementation.

3. Indirectly, CAMP activities support improvements to Integrated Safety Management System core functions 1, 2, 3, and 4 through improvements in defining the scope of work, identifying and analyzing hazards, developing and implementing hazard controls, and performing quality work within controls.

5.0 REFERENCES

- 5.1 24590-WTP-3DP-G04B-00063, *Supplier Deviation Disposition Request.*
- 5.2 24590-WTP-G63-HR-002, *WTP Anti-Harassment Policy.*
- 5.3 24590-WTP-G63-RACA-CR-0001, *Integrated Issues Management Policy.*
- 5.4 24590-WTP-GPG-MGT-0008, *Supervisory Safety Watch.*
- 5.5 24590-WTP-GPG-RACA-CR-0130, *Cause Analysis Practitioner Guide.*
- 5.6 24590-WTP-GPP-GCB-00100, *Field Material Management.*
- 5.7 24590-WTP-GPP-MGT-005, *Employee Concerns Program.*
- 5.8 24590-WTP-GPP-MGT-008, *Stopping Work.*
- 5.9 24590-WTP-GPP-MGT-021, *Event Management and Investigation.*
- 5.10 24590-WTP-GPP-MGT-023, *Differing Professional Opinion.*
- 5.11 24590-WTP-GPP-MGT-044, *Nonconformance Reporting and Control.*
- 5.12 24590-WTP-GPP-MGT-050, *Trend Reporting and Analysis.*
- 5.13 24590-WTP-GPP-MGT-067, *Supplier Corrective Action.*
- 5.14 24590-WTP-GPP-PSQ-050, *Receiving Inspections.*
- 5.15 24590-WTP-GPP-RACA-CR-0110, *Condition Report Initiation.*
- 5.16 24590-WTP-GPP-RACA-CR-0111, *Condition Report Screening.*
- 5.17 24590-WTP-GPP-RACA-CR-0112, *Condition Report Evaluation and Action Plan Development.*
- 5.18 24590-WTP-GPP-RACA-CR-0113, *Condition Report Action Response, Approval, Verification, and Closure.*
- 5.19 24590-WTP-GPP-RACA-CR-0114, *Condition Report Effectiveness Review.*
- 5.20 24590-WTP-GPP-RACA-CR-0115, *Condition Report Change Request Process.*

- 5.21 24590-WTP-GPP-RACA-CR-0116, *Performance Improvement Review Boards*.
- 5.22 24590-WTP-GPP-SIND-001, *Occurrence Reporting*.
- 5.23 24590-WTP-GPP-SRAD-041, *Radiological Problem Reports*.
- 5.24 24590-WTP-GPP-SS-005, *Reporting Security Incidents*.
- 5.25 24590-WTP-PD-MGT-0001, *Graded Approach*.
- 5.26 24590-WTP-PD-RACA-CA-0001, *WTP Contractor Assurance System Program Description*.
- 5.27 24590-WTP-QAM-QA-06-001, *Quality Assurance Manual*.
- 5.28 10 CFR Part 707, Energy: *Workplace Substance Abuse Programs at DOE Sites*. Code of Federal Regulations.
- 5.29 10 CFR Part 820, Energy: *Procedural Rules for DOE Nuclear Activities*. Code of Federal Regulations.
- 5.30 10 CFR Part 830, Energy: *Nuclear Safety Management*. Code of Federal Regulations.
- 5.31 10 CFR Part 835, Energy: *Occupational Radiation Protection*. Code of Federal Regulations.
- 5.32 10 CFR Part 850, Energy: *Chronic Beryllium Disease Prevention Program*. Code of Federal Regulations.
- 5.33 10 CFR Part 851, Energy: *Worker Safety and Health Program*. Code of Federal Regulations.
- 5.34 NQA-1-2000. *Quality Assurance Program for Nuclear Facilities*. American Society of Mechanical Engineers, New York, NY.
- 5.35 DOE. 2006. *Quality Assurance Requirements and Description for the Civilian Radioactive Waste Management Program (QARD)*. DOE/RW-0333P, Rev 20. US Department of Energy, Washington, DC.
- 5.36 DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*. US Department of Energy, Washington, DC.
- 5.37 DOE O 232.2, Admin Change 1, *Occurrence Reporting and Processing of Operations Information*. US Department of Energy, Washington, DC.
- 5.38 DOE O 414.1C, *Quality Assurance*. US Department of Energy, Washington, DC.

ATTACHMENT 1 ACRONYMS and DEFINITIONS

CAMP	Corrective Action Management Program
CAQ	condition adverse to quality
CR	condition report
CRRC	Condition Report Review Committee
DPO	differing professional opinion
PAAA	Price-Anderson Amendments Act
PIER	project issues evaluation reporting
QAM	Quality Assurance Manual
QARD	Quality Assurance Requirements and Description
WTP	Hanford Tank Waste Treatment and Immobilization Plant

Definitions	
condition	The existence, occurrence, or observation of a situation that requires further review, evaluation, or resolution.
condition adverse to quality	An all-inclusive term used in reference to any of the following: failures, malfunctions, deficiencies, defective items, and nonconformances. A significant condition adverse to quality is one which, if uncorrected, could have a serious effect on safety or operability. (This applies to: activities or operations that involve radioactive and/or fissionable materials in such form or quantity that a nuclear hazard potentially exists to the employees or general public; suspect/counterfeit items, control of safety software, highly hazardous chemicals (NO _x , Ammonia), and IHLW/ILAW impacting activities.) ²
corrective action to prevent recurrence	An action type for corrective actions specified to prevent repetition of significant conditions adverse to quality.
corrective action	Measure(s) taken to rectify conditions adverse to quality and, where necessary, to prevent repetition (includes the following action types: immediate, compensatory, remedial, corrective action to prevent recurrence, corrective action likely to prevent recurrence, and corrective).
corrective action likely to prevent recurrence	An action type for corrective actions specified to reasonably prevent repetition of conditions adverse to quality.
significant condition adverse to quality	A condition adverse to quality that, if uncorrected, could have a serious effect on safety or operability.

ATTACHMENT 2 GUIDING PRINCIPLES

Guiding principles specific to the corrective action management process phases are detailed in Corrective Action Management Program implementing procedures.

It is core business – CAMP is a foundational responsibility of all WTP staff. It is our primary issue management system, is part of our Quality Management System, and promotes a Safety Conscious Work Environment.

Be self-critical – In high-hazard industries, a learning organization builds confidence and trust of stakeholders by identifying and resolving issues ourselves. All organizations have problems. Great organizations identify and correct them promptly.

Be factual and transparent – Clear, concise, accurate, and transparent documentation within CAMP results in thorough understanding of what happened, why it happened and how it will be corrected. What matters is our written documentation, not verbal commentary.

Seek and share knowledge – Direct communication between the originator, subject matter experts, supervision, and the issue resolution team improves quality and reduces rework. This is a shared responsibility.

ATTACHMENT 3 INTEGRATED ISSUES MANAGEMENT PROCESSES

The *Integrated Issues Management Policy* (24590-WTP-RACA-CR-0001) establishes the Corrective Action Management Program as the primary issues management program for documenting and resolving conditions adverse to quality identified at the WTP. As defined in the *Quality Assurance Manual*, 24590-wtp-qam-qa-06-001, and the *WTP Contractor Assurance System Program Description* (24590-WTP-G63-RACA-CR-0001), identifying and resolving conditions adverse to quality and other unwanted or unplanned conditions that affect safety and quality are to be documented and addressed through CAMP. The Corrective Action Management Program also includes the opportunity for employees to document recommendations, opportunities for improvement, and suggestions.

Before working to the CAMP procedures, it is important to know that, in addition to the Corrective Action Management Program, there are other acceptable business systems in place as part of the integrated issues management approach implemented at the WTP that include steps to identify and resolve specific issues. Employees are encouraged and expected to initiate a CR for any issue when in doubt as to which system is appropriate. Responsible managers then have the responsibility for addressing the CR using the appropriate system if other than the CAMP.

The following business systems interface with the CAMP and may be used alone or in conjunction with the CAMP procedures; it is important to understand how each interfaces with the CAMP and when a CR is to be initiated:

1. 24590-WTP-GPP-MGT-005, *Employee Concerns Program*
Initial investigation through the Employee Concerns Program process; issues identified as a result of the investigation may result in the need for a CR to be initiated.
2. 24590-WTP-G63-HR-002, *WTP Anti-Harassment Policy*
Initial investigation of issues pertaining to harassment, intimidation, retaliation, or discrimination is addressed through Human Resources; issues identified as a result of the investigation may result in the need for a CR to be initiated.
3. 24590-WTP-GPP-MGT-067, *Supplier Corrective Action*
Issues are addressed through the supplier corrective action process; no CR is initiated.
4. 24590-WTP-GPP-MGT-021, *Event Management and Investigation*
Immediate actions are addressed through the event management and investigation process and a CR is initiated.
5. 24590-WTP-GPP-SIND-001, *Occurrence Reporting*
Immediate actions are addressed through the normal business process and a CR is initiated.

6. 24590-WTP-3DP-G04B-00063, *Supplier Deviation Disposition Request*
Normal work process unless the issued document contains non-editorial errors that adversely affect the technical content of the document or the supplier deviation disposition request is written to identify procurement document errors.
7. 24590-WTP-GPP-MGT-044, *Nonconformance Reporting and Control*
Actions to address the specific nonconformance are performed in accordance with the nonconformance reporting and control process; if a programmatic concern, a systemic concern, or to prevent recurrence is identified, a CR is to be written.
8. 24590-WTP-GPP-GCB-00100, *Field Material Management*
Issues are reported in accordance with 24590-WTP-GPP-MGT-044.
9. 24590-WTP-GPP-PSQ-050, *Receiving Inspections*
Issues that do not meet the definition of a nonconformance according to 24590-WTP-GPP-MGT-044 are reported by initiating a CR.
10. 24590-WTP-GPP-MGT-008, *Stopping Work*
Immediate actions are addressed using the stop work processes; then, a CR is initiated.
11. 24590-WTP-GPP-MGT-0008, *Supervisory Safety Watch*
The need for a CR is determined by the Site Manager based on results of the senior supervisory watch report.
12. 24590-WTP-GPP-SRAD-041, *Radiological Problem Reports*
Immediate actions are addressed using the business process; a CR is initiated if certain conditions are met as identified by the process (e.g., significant release).
13. 24590-WTP-GPP-SS-005, *Reporting Security Incidents*
Not all security incidents are equal; security incidents that, if reported, may jeopardize the safety and security of the WTP staff or facilities should not be reported in the Corrective Action Management Program. A CR is submitted for security incidents involving badging, prohibited articles, export controlled information, or other incidents that do not jeopardize the safety or security of staff or facilities.
14. 24590-WTP-GPP-MGT-023, *Differing Professional Opinion*
Issues of differing technical professional opinion, disputes, or dissent are initially handled through normal management communications. However, if resolution is not reached, the differing professional opinion (DPO) process may be used. When a DPO Resolution form is submitted, the DPO originator initiates a CR for tracking.

Electronic documents, once printed, are UNCONTROLLED and may become outdated.
Refer to the electronic documents in InfoWorks for current revision.

Corrective Action Management Program Description

24590-WTP-PD-RACA-CR-0100, Rev 0

Level of Use: N/A

ATTACHMENT 4 REQUIREMENTS REFERENCE

¹ DOE O 226.1B, Attachment 1, 2.b.(3)

² QAM Appendix C, 24590-WTP-PD-MGT-0001 Section 3.0