11 CORRECTIVE ACTION

11.1 NONCONFORMANCE REPORT

The Project QA Manager will issue a Nonconformance Report (NCR) for each nonconforming condition identified (e.g., when overall objectives for precision, accuracy, completeness, representativeness, or comparability are not satisfied), or when unacceptable procedural practices or conditions are identified. (An NCR is typically not issued for qualified data as a result of validation or review unless significant data are rejected [typically qualified with an "R" flag]). An NCR form is provided in Figure 11-1. The Laboratory QA Manager will issue NCRs concerning laboratory performance and will make them available to the Project QA Manager and QC Manager.

The NCR will fully describe the conditions requiring corrective action, indicate the nature of the corrections required, and specify a schedule for compliance. The final authority for issuance of an NCR rests with the QA Manager who will notify the Project Manager. The NCR will indicate closure as noted below (Section 13.2).

11.2 CORRECTIVE ACTION

Upon the issuance of an NCR by Foster Wheeler, it will be delivered to the Laboratory QA Manager, the Project Manager, and/or subcontractor involved. The NCR will provide space for the responsible individual to indicate the nature of the corrective action taken and will require appropriate documentation of such action. The corrective action taken will include measures to preclude a repetition of the original deficiency. After the NCR has been reviewed and the corrective action is acceptable, the Project QA Manager, QC Manager, and the Laboratory QA Manager (if applicable) will sign the NCR to this effect and provide documentation to the specified parties that the NCR has been satisfactorily resolved.

11.3 STOP-WORK ORDER

If corrective actions are insufficient, if resolution cannot be reached, or if results of prior work are indeterminate, work may be stopped by a Stop-Work Order. The Stop-Work Order can only be authorized by the Project Manager or Project QA Manager in writing. If there is a disagreement between the QA Manager and the Project Manager, the differences will be brought to the attention of succeeding levels of management until resolution is achieved. The Stop-Work Order will remain in effect until the problem is satisfactorily resolved in the judgment of the responsible parties noted above. The Stop-Work Order will apply only to affected tasks, and not necessarily to the entire project.

Figure 11-1. NCR Form

NONCONFORMANCE REPORT

Client	NCR No.
Project	Date
Responsible Contractor	
Applicable Daily Report	
Drawing No./Specification No.	

1. Description of Nonconforming Component		
Name & Signature	Title/Company	Date

2. Recommended Disposition & Corrective Action		
Name & Signature	Title/Company	Date

3. Review of Recommended Disposition and Corrective Action Accepted _____ Rejected _____ Accepted with Comments _____		
Verification of Disposition and Corrective Action Required _____ Not Required _____		
By (Signature)	Title	Date

4. Inspector Acceptance	Date	Project QA Manager Acceptance	Date

5. Distribution	
Laboratory QA Manager	
QC Manager	
Project Manager	

11.4 STOP-WORK CORRECTIVE ACTION

The conditions for which the Stop-Work Order was issued will be described in sufficient detail to allow proper evaluation of the problems and to effect proper corrective action. Documentation of discussions, telephone conversations, or correspondence that describe the actions taken to evaluate the problems, provide solutions, and verify implementation of solutions will be attached to the Stop-Work Order and fully referenced in the appropriate spaces. Work will not continue until the Stop-Work Order has been rescinded by the individual that authorized the Stop-Work Order. The Project Manager (or designee) must be notified within 48 hours of a Stop-Work Order.

11.5 CAUSE AND ACTION TO PREVENT RECURRENCE

The QA Manager will track the NCRs, analyze the corrective actions required, and take the necessary steps to resolve the causes of the nonconforming conditions to prevent recurrence.

11.6 FIELD CHANGE

The Project Manager or his designee is responsible for all site activities. In this role the Project Manager at times might be required to adjust the site programs to accommodate site-specific needs. When it becomes necessary to modify a program, the responsible Site Manager notifies the Project Manager and Project QA Manager of the anticipated change and implements the necessary changes. Rayonier, Ecology, and the Tribe will be notified as appropriate. When a change is determined to be necessary, a written notification will be submitted by the initiator on a Field Change Request (FCR) form, as described in the SAP (Volume II). If unacceptable, the action taken during the period of deviation will be evaluated in order to determine the significance of any departure from established program practices and appropriate action taken.

The substantive changes in the program, which are documented on a FCR form, must be signed by the initiator, Project QA Manager, QC Manager (as appropriate), Project Manager, or their designees. Minor changes require only the signatures of Foster Wheeler staff. Field changes that do not affect the end use of the data, or other QA parameters will be handled within Foster Wheeler. Changes that significantly affect the PARCC should be approved by all QAPP signatories. A typical FCR Form used to document field changes is provided in the SAP (Volumes II). The FCRs for each document will be numbered sequentially starting with the number 001.

The Project Manager is responsible for controlling, tracking, and implementing the identified changes. Completed FCRs, at a minimum, will be distributed to the Project Manager, Technical Leads, Foster Wheeler Project QA Manager, and the QC Manager.

11.7 OTHER CORRECTIVE ACTIONS

11.7.1 LABORATORY QUALITY CONTROL SAMPLES

If laboratory QC samples are outside of specified control limits as established in Tables 3-2 to 3-5, or as specified by the methods or implementing SOPs, the associated data will be flagged, following general EPA guidance and conventions. These data will be reviewed and/or validated by the QC Manager (or designee). Based on professional judgment, the data will be determined to be usable or not usable for intended purposes. If judged not usable, the QC Manager will notify the Project Manager, and the decision for resampling/reanalysis will be determined on a case-by-case basis, depending on the needs for and uses of the particular data sets in question.

11.7.2 PERFORMANCE AND SYSTEMS AUDITS

If the performance or system audits identify deficiencies, these deficiencies will be documented in the audit report. In addition, a recommended list of corrective action items will be developed, specific to the auditor's findings, observations, and comments. The project technical staff will be solicited for input, as required, depending on the nature and extent of the finding. A copy of the audit report will be provided to the Project Manager. These items, depending upon the level of deficiency, will require follow-up by the responsible parties and approved and closed by the auditor and Project QA Manager.