### Closing DOECAP Findings

**Pete Yerace** 

What do you see?

Be objective!



#### Objectives

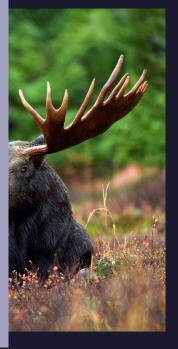
- How to Close a previous Year Finding
- Remote, Hybrid and Onsite
- Verifying objective evidence
- Determining if the finding can be closed
- Template language for closing a finding
- Example exercises



#### Site/Hybrid/Onsite

There are three different approaches for closing previous year findings

- Remote with no site visit
- Remote with Site Visit
- Site Visit Only







#### General Approach Review History

 Go back to previous year auditor notes and review the basis for the finding.
 Review finding language in last years audit report and review facilities corrective action response and any objective evidence packages uploaded to SharePoint folders.



# Closing Finding Remote Audit Process

Request objective evidence from site prior to remote audit. Have this uploaded to auditor folder.

When requesting info go through DOECAP Contractor (PEC) POC

Review objective evidence prior to remote 30-minute interview. Be prepared to discuss in detail as part of 30-minute interview.

Use closure template language required by ASP Manager

# Closing Finding Hybrid/OnSite Audit Process

Request objective evidence from site prior to hybrid/on-site audit. Have this uploaded to auditor folder.

When requesting info go through DOECAP Contractor (PEC) POC

Review objective evidence prior to remote 30-minute interview. Be prepared to discuss in detail as part of 30-minute interview. May need to perform visual when audit team performs site portion. If on-site only be prepared to discuss with POC at site. May need to visually confirm.

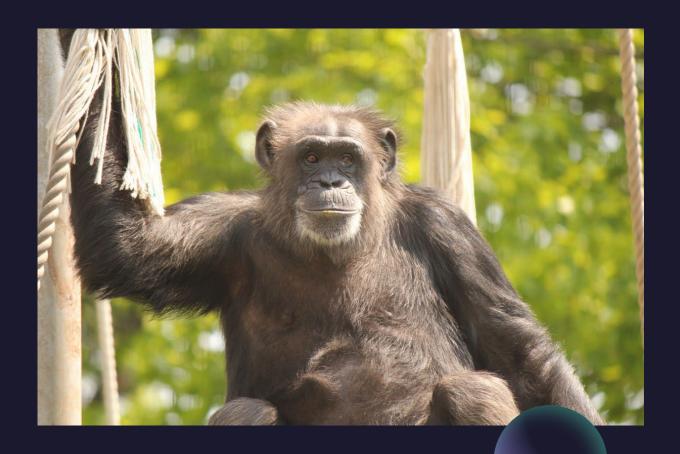
Use closure template language required by ASP Manager and complete on the DOCAP Report Site.

#### Mr. Clark Template Closure Language

- Became a requirement in 2019.
- Graded approach based on severity of finding
- Objective evidence can be verified either by remote review and/or site verification



#### Mr. Clark, How do we do this?





- Minimal effectiveness review required on procedure updates. Use the "graded approach" when evaluating the complexity of the finding.
- Objective evidence was reviewed in the form of the facilities condition report. Corrective action was the update of procedure XXXXXXXX.
   This action confirms effectiveness of the corrective action and therefore the finding is closed.

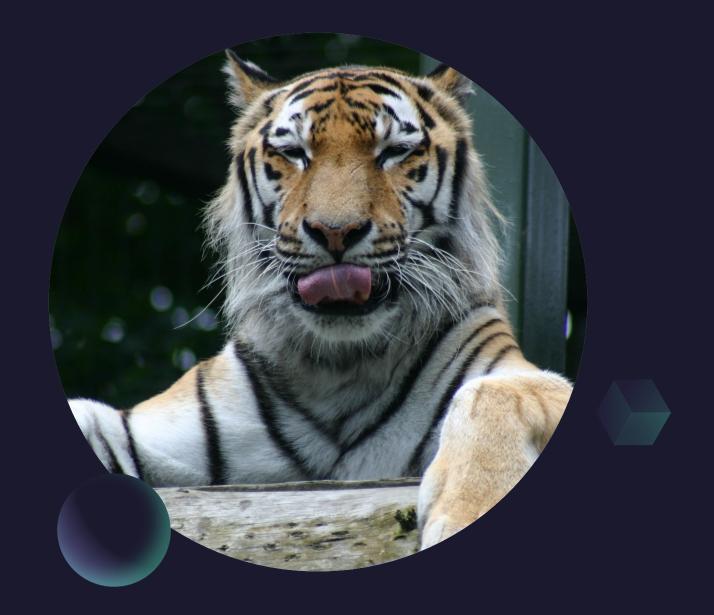
#### Objective Evidence Template Language

Objective evidence was reviewed in the form of (the facility's condition report-if any created, pictures, training docs, etc.). (Auditors – be sure to include identification of documents by date, version, numbers, etc.) Report (condition report number/s) was written by the facility to document and track the finding. Corrective actions were implemented to (identify what they said they were going to do to address the finding). On (date of surveillance) the facility performed a surveillance to verify effectiveness of their corrective action. It was determined that the (whatever action) was/were still in place and adequate conditions existed at the (location). The facility did not identify any further issues and concluded (what was the conclusion). These actions confirm effectiveness of the corrective action and therefore the finding has been closed.



#### Details of Verification of Effectiveness

- More detailed effectiveness reviews are necessary for some findings to be closed.
- Objective evidence reviewed included a revision to the process to include waste disposition. Reviewed process for waste disposition to include all secondary waste.
   Procedure ABC was reviewed and included all revisions that support work that is being conducted. The revised procedure included the requirement for instructions for secondary waste generation. This action confirms correction action effectiveness and the finding is closed.



The way to get started is to quit talking and begin doing.

Walt Disney and Mr. Clark





Exercise 1: Ref DOECAP Report Outlander Site IC-1 • What do you do? Can you close this finding? Work with your group to develop closure language.



Exercise 2: Reference DOECAP Report Outlander Facility IC-2.

What do you do? Can you close this finding? Work with your group to develop closure language.

#### Exercise 3: Reference DOECAP Report Outlander Facility QA-1

• What do you do? Can you close this finding? Work with your group to develop closure language.





### Exercise 4: Reference DOECAP Report Outlander Facility WO-1

 What do you do? Can you close this finding? Work with your group to develop closure language.

#### Summary

- When closing findings auditor needs to:
- Evaluate objective evidence provided
- Be prepared to discuss with facility POC
- Determine if need to verify in field
- Use standard template language for closing finding and adjust language depending upon severity of finding
- Close the finding on the DOECAP Report Site and save your work so it doesn't get lost



