

Introduction

The current process by which LLWR Service Assurance formally notifies issues to both Customers and Service Providers is via the Service Non-Conformance Report Template (ref: WSC-TEM-SNC). Feedback has highlighted the negative and potentially confrontational aspect of this process, in particular the use of the terminology non-conformance. LLWR recognise that in many cases the intention of this formal communication is to enable trending of issues and to initiate dialogue and that the terminology currently being used can therefore be detrimental to open discussion. Additional feedback has also commented on the lack of any ranking of these issues. In order to act on this positive feedback the proposal is to rebrand the notification as a Condition Report and include ranking that is based on standard risk terminology used in the industry.

Proposal

Service Non-Conformance Reports will be rebranded as Condition Reports and the formal notification will be via Condition Report Template ref: WSC-TEM-CRT. This is not dissimilar to the current SNC Report format; one major change is that the Condition Report will include a ranking of the issue, based on risk.

A graded approach will be employed based on the same risk threshold terminology used by the UK's nuclear industry, i.e., intolerable, tolerable, manageable. It should be noted that these criteria were also allocated a coding (based on DOE-STD-1197-2011) with the intention of being able to factor this assessment into LLWR's OEF trending systems.

CAT1 - Intolerable: This denotes that the issue has breached regulations (receiving site/facility permit; transport regulations) or is significant safety risk. Examples being

- LLW being consigned as VLLW to a Landfill facility, which would be a total breach of the receiving sites permit.
- Consignment to thermal treatment which contains something which could cause an explosion, which would be a significant safety breach.

CAT2 - Tolerable: This denotes where an issue has been highlighted, but remains within the site/facility permit and safe working arrangements. An example would be where an item or items are present in the waste consignment which have not been declared, but would be acceptable if they had, or the item or item(s) are at a greater level than declared.

CAT3 - Manageable: An issue has been raised which is well within regulatory/permit/safety envelope but could cause miss understanding. An example would be issues with documentation being incorrectly completed. It can also be used where a potential issue has been realised and then can be used as a formal route to open dialogue.

Reports will also be given a category which has been based on the U.S. DOE-STD-1197-2011 Causal Codes:

C01 Packaging - what the waste is contained in for transfer - so Drum/Skip/ISO.

C02 Documentation/Data - any documents which are incorrect. Data is the info declared in WCHs and or WCIs etc.

C03 Transport - this covers the actual vehicles and methods of movement of containers.

C04 Service Issues - generally will cover the service provider not delivering as contracted be it treatment or transport.

C05 Miscellaneous - an issue which is unique and not covered by other categories.

C06 External rad contamination – an instance where radiological contamination has been discovered on the external of either the packaging or transport vehicle.

C07 Verification Monitoring - issues found which require investigation this will be after some initial discussion if anomalies found.

For example

- Worst case for mis-consignment of waste would be *CAT1 – Intolerable: C02 Documentation/Data* and
- A query regarding paperwork would be *CAT3 – Manageable: C02 Documentation/Data*

Implementation

LLWR would like to roll this out as soon as possible, but in order to enact a process that provides value we encourage the views of both Customers and Service Providers. The template will be available for review at <http://llwrsite.com/customer-portal/customer-consultation/>. Please provide feedback on the proposed template to serviceassurance@llwrsite.com by 30th April 2016.

As part of the implementation process LLWR will be issuing a contract amendment to Schedule 5 (Waste Acceptance Procedure) of the Waste Services Contract to remove the Service Non Conformance Report WSC-TEM-SNC and replace with the Condition Report Template WSC-TEM-CRT.

Further Information and Questions

If you require any further information or have any queries relating to this Customer/Supplier Notice, please send an e-mail to: tony.j.wood@llwrsite.com or call: Tony Wood – Service Assurance Manager on 019467 70249

Distribution List

We have issued this Notice to the following people from your Company's Contact Details Form (Reference: WSC-FOR-CON):

- All nominated representatives

If you need to update these details, please submit a revised Form: <http://llwrsite.com/customer-portal/resourc>