



## Assessment narrative report

### BACKGROUND

The Technical Division has had a policy in place for about ten years that covered the ES&H and NEPA review of purchased items, services and construction projects of all sizes. That policy, TD-4100, has undergone numerous revisions over the years and is currently on revision number six. The purpose of TD-4100 is to provide a NEPA/ES&H review of all procurement actions within the Technical Division before being ultimately forwarded to the Business Services Section Procurement Department. All purchase requisitions, ProCard purchases, task orders, short orders and acquisitions from government excess for activity or use in the Technical Division must be reviewed by TD ES&H personnel. Personnel from the TD Quality and Materials Department can approve items on a pre-approved list in TD-4100.

The latest revision to TD-4100, approved January 2, 2012, incorporates a review for Quality Assurance (QA), for certain specified items where safety is a consideration, and sustainable acquisition (SA). The policy was so revised not because it was necessarily required by Fermilab policy, but rather because the Division felt that it was the right thing to do.

### OVERVIEW

The purpose of this tripartite review was to verify compliance with the SA and QA portions of TD-4100. Before describing the assessment process, however, an overview of the NEPA/ES&H review process within TD will be provided.

#### Purchase Requisitions

All Purchase Requisitions within TD are handled by the Quality & Materials Department (QMD) Acquisition Group. When ordering information is received by QMD, the requested purchase is assigned to the appropriate Acquisition staff by the Group Supervisor or the Department Head. An ordering form is generated internally that indicates the drawing number that is needed (in the case of a fabricated part), as well as any other pertinent information. This form is then attached to a copy of the drawing and submitted for cost estimating and routing. This form is not used in the case of "off the shelf" items. The ordering form is returned to the assigned Acquisition staff that generated it, who will then begin the procurement requisition process.

After review, the Acquisition Group Supervisor or Department Head will sign the requisition and return it to the QMD administrative desk. The ES&H pre-qualified items review will be performed at the QMD administrative desk by trained QMD personnel. The requisition will be stamped and signed by the appropriate QMD individual. If further ES&H review is needed per TD-4100, i.e. the item is not on the pre-qualified list,

the requisition will be submitted to the Division ES&H group for review and stamped, signifying their approval. (See below.)

An approved Division Requisition Preparer will enter the TD approved requisition into the MMS database to obtain a requisition number.

### ProCards

A number of individuals in TD, in addition to the individuals in the Acquisition Group, have Procurement Cards (ProCard). The ProCard User's Manual clearly defines what purchases can and cannot be made with the ProCard. TD-4100 also clearly defines ProCard sensitive items, i.e. those that must have an ES&H review (see below), and those that are considered pre-qualified not needing an ES&H review. ProCard holders in TD have created their own personal paper form that is used as a means for them to maintain a record of the approvals that they have received for making the purchase. This includes an ES&H approval for those items not on the pre-qualified list.

### ES&H Reviews

All requisitions and ProCard orders, with the exception of those items on the pre-qualified list, got through the TD ES&H Group for a NEPA/ES&H review. In regards to the revisions to TD-4100, the TD Environmental Officers scrutinizes the requests for SA purposes, and the TD SSO scrutinizes the requests for the QA items listed in the policy. The requestor is contacted in either case if there is a question about the item being requested, or whether to inquire if a SA-equivalent item was researched for example. Requestors have been responsive to inquiries from the TD ES&H Group, and in the case of SA, have gone back to look for an SA-equivalent item. In some instances the TD ESO has researched SA-equivalent items. If an SA-equivalent item is not ordered, it usually is because the item is not cost-effective. The TD SSO has noted that requests have been coming through for US-manufactured fasteners and ASME compliant lifting hardware, and with appropriate certifications being requested.

### QA Reviews (S/CI)

The QMD Quality Control Group Leader is considered the TD expert when it comes to S/CI, and follows the OQBP Policy *Controlling Suspect Counterfeit Items Procedure*, 3/19/2010, QA 1006. When S/CI items are found, he will examine them and if determined to be suspect, will confiscate the item and tag it as S/CI. He will then generate a Discrepancy Report (DR) by entering information into the Vector database. The DR is assigned for disposition of the item. Progress towards resolution/disposition is tracked on the DR. Whatever the final disposition, the Department Head will sign off on the DR to close it out.

For purchases, a note is placed on the requisition or ProCard order indicating an inspection is required. Personnel in QMD then perform varying levels of quality control. These range from verifying that the items received are those that were ordered, to performing actual measurements on machined items to ensure that they meet specification.

## ASSESSMENT PROCESS

The assessment team was provided with a copy of TD-4100, *Procurement Review: ES&H, NEPA and QA Requirements*, revision 6 dated January 2, 2012, prior to the start of the assessment. The team first met with John Zweibohmer, who was the Division coordinator for the team and the Deputy Head of the Quality and Materials Department (QMD), to obtain an overview of the procurement process within TD. As a result of that discussion, the team was provided with the following QMD documents dealing with procurement:

- TD-2201, Version 2, *Flow of Parts and Assemblies Received at the Technical Division Component Storage Facility*, dated 2/18/2011.
- TD-2202, Version 2, *Procedure for the Flow of Requisitions Handled by the Quality & Materials Department*, dated 2/22/2011.
- TD-2203, Version 3, *Task Order Policy and Procedure*, dated 2/24/2011.

After getting a clearer understanding of the procurement process in TD, the team determined that the following individuals would be interviewed:

- Beth Karau, Administrative Assistant, QMD, ensures procurement requests have the necessary approvals, including an ES&H review, and enters them into MMS.
- Bridget Scerini, TD EO, reviews all requisitions and ProCard orders for items not on the pre-qualified list.
- Sherri Larson, Administrative Assistant, Machine Shop Department, is a ProCard holder and orders metal stock and office supplies for the department.
- Les Peters, TD Support Department, Building and Task Manager, is a ProCard holder and purchases many varied items, ranging from building maintenance items to training seminars for Support and ES&H personnel.

## OBSERVATIONS

ProCard holders in TD are identified with an ITNA question unique to TD, which then identifies them for training on the TD-4100 policy. All of the individuals interviewed were familiar with the revised TD-4100 policy and the current pre-qualification list. They were also aware that anything not on this list needed to be reviewed further and that ES&H review was required. In addition, those that utilized the ProCard were familiar with the ES&H sensitive list and checked it prior to purchasing items. The QMD Reviewers have received appropriate training and the ES&H Reviewers have appropriate ES&H credentials and training. Training and guidance on TD-4100 has been given to all TD ProCard holders:

- ProCard holders must read the TD-4100 policy and sign off on an attendance sheet certifying that they have reviewed the policy whenever minor changes are made to the policy.
- ProCard holders are brought together in a class room setting whenever significant changes are made to TD-4100.

Requisitioners have been provided guidance in a number of ways when it comes to purchasing potential SA items. Before the policy was revised to its current form, and since it was put into effect, the TD ES&H Group has made an effort to inform the Division staff about these revisions in a number of ways:

- The December 2011 TD ES&H Newsletter included a write-up announcing the revisions that were being made to TD policy 4100, highlighting the addition of sustainable acquisition and QA to the policy. The new requirements for employees regarding SA for their purchases were summarized in the article.
- A write-up specifically devoted to SA was included in the March TD ES&H Newsletter. The write-up included a link to the SA site to which individuals could refer when making their purchases.
- An all Division employee e-mail was sent out summarizing sustainable acquisition and what the changes to the internal ES&H review policy would mean for TD employees for certain listed purchases.

Implementation within TD of Policy 4100 appears to have been effective and this is likely due to TD's communications efforts.

## FINDINGS

There were no findings from this assessment.

## RECOMMENDATION

The next time that TD-2202 is revised, include a reference to sustainable acquisition that would reinforce the requirements of TD-4100.

## FINDINGS

Space is provided below for 19 findings. If you have more than 19 findings, you will need to start a new document from the template. [ In such instances, each should be saved as a separate document that can later be combined into a complete self-assessment report.]

Findings should be limited to **substantive issues** that are clearly worthy of being addressed. They should be worded as “**statements of fact**” rather than instructions and should define a clear endpoint to be addressed. Observations, recommendations, suggestions, noteworthy practices, best management practices, and lessons learned that are clearly not “findings” should be included in the review description.

**Finding #1** Date found > Citation >  
Found within Location >  
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**Finding #2** Date found > Citation >  
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**Finding #10** Date found > Citation >  
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**Finding #11** Date found > Citation >  
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**Finding #12** Date found > Citation >  
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**Finding #13** Date found > Citation >  
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**Finding #14** Date found > Citation >  
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**Finding #15** Date found > Citation >  
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**Finding #16** Date found > Citation >  
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**Finding #17** Date found > Citation >  
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**Finding #18** Date found > Citation >  
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**Finding #19** Date found > Citation >  
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