APPENDIX D

Pre-Operational Surveys

DEPARTMENT OF THE ARMY
OFFICE OF THE CHIEF OF STAFF
200 ARMY PENTAGON
WASHINGTON DC 20310-0200

REPLY TO
ATTENTION OF

DACS-SF

27 July 2004

MEMORANDUM FOR COMMANDER, HUNTSVILLE CENTER, ATTN: CEHNC-OE, P.O. BOX 1600, HUNTSVILLE, AL 35807-4301

SUBJECT: U.S. Army Corps of Engineers (USACE)-Led Pre-Operational Survey Plan

1. Reference CEHNC-OE memorandum dated 13 Jul 04, SAB.

2. The USACE Pre-Operational Survey Requirements and Procedures for MM-CX Recovered Chemical Warfare Materiel (RCWM) Response Actions has been reviewed by this office and the US Army Technical Center for Explosives Safety (USATCES). The plan is approved for implementation.

3. Please contact Mr. Ken Proper, Army Safety Office, (703) 601-2408, or Mr. Barry Wilmington, USATCES, (918) 420-8007, if you have any questions.

JAMES A. GIBSON
Senior Safety Manager
Office of the Director of Army Safety

CF:
HQDA, DASA(ESOH), ATTN: Mr. Patton
Cdr, USACE, ATTN: CESO-SWD (Ms. Roberts), 441 G St. NW, Wash, DC 20314-1000
USATCES, ATTN: SJMAC-ESM (Mr. Wilmington), Bldg 35, 1C Tree Road, McAlester, OK 74501-9053

USACE Pre-Operational Survey Requirements and Procedures for MM CX Recovered Chemical Warfare Materiel (RCWM) Response Actions

1. General.

a. All USACE Recovered Chemical Warfare Materiel (RCWM) projects will have a Pre-Operational Survey, here after called "Survey" conducted and successfully completed on the site prior to any intrusive activities. Headquarters, United States Army Corps of Engineers (HQUSACE) is responsible for the execution of the Survey, as the MACOM. HQUSACE has delegated the responsibility for the conduct of the Survey to the Commander, U.S. Army Corps of Engineers, U.S. Army Engineering and Support Center, Huntsville (USAESCH), Huntsville, Alabama. The Military Munitions Center of Expertise (MM CX) within USAESCH will lead the Survey.

b. All planned RCWM response actions must undergo a Survey prior to the start of operations. This includes sampling efforts, if the intent is to dig to an anomaly and there is a potential to encounter RCWM, or if provisions are made to store RCWM. Surveys are valuable and necessary tools in the preparation of chemical agent operations at response action projects. Surveys are intended to judge the readiness of those organizations performing response actions activities to operate in a safe and healthful manner and are the final step in gaining approval to conduct operations. Surveys are not training events, nor are they the time to draft safe work procedures. It is the responsibility of the Project Manager (PM) to have response personnel fully trained, practiced, and prepared for the Survey prior to arrival of the Survey team.

c. The Survey evaluates planned activities relative to safety, health, environment, and operational readiness and recommends whether the planned activities should be allowed to transition to chemical agent operations. Survey teams will consist of subject matter experts from the organizations listed below, as available. The Survey will be conducted under the direction and control of the U.S. Army Corps of Engineers. Survey team members will be selected based on technical background and areas of expertise**. The Project Delivery Team (PDT) consists of any personnel responsible for the execution of the project on the ground. Under no circumstances will members of the PDT serve as evaluators on the Survey Team. This is necessary to preclude any possibility of biased participation. The MM CX will select the team members and serve as the Survey Team Leader.** The organizations below will be invited to participate in the Survey. However, based on availability, the minimum acceptable number of personnel required to participate on the Survey team, as evaluators, will be three; the MM CX (lead), United States Army Technical Center for Explosives Safety (USATCES), and one from any of the other organizations identified as evaluators listed below.

(1) The PM for the site (both District and USAESCH) or Installation Commander (non- evaluator).

(2) U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) (evaluator).

(3) Each agency responsible for executing on-site RCWM activities (e.g., The Guardian Brigade (Technical Escort Unit), U.S. Army Research Development and Engineering Command (ECBC) (evaluator).

(4) Program Manager for the Elimination of Chemical Weapons (PMECW) (evaluator).

(5) HQ USACE Safety and Occupational Health Office (CESO) (evaluator).

(6) For active installations and BRAC project sites, or Work for Others, the corresponding Safety offices will be invited to attend (non-evaluator).

d. Surveys will examine all aspects of chemical agent operations and emergency response activities. The Survey team will review pertinent documentation, inspect selected processes, support equipment and facilities, as appropriate, and witness selected activities and operations. Operations during Surveys will be conducted as though chemical agent and/or explosives were present. If specific simulations or deviations from this concept are required, they must be approved by the Survey team leader before the start of the Survey and explained in the Survey report. The need for significant simulations or deviations may indicate that the system is not ready to operate, precluding successful completion of the Survey (e.g., having to simulate that the chemical agent filtration system (CAFS) (if used) is fully operational due to mechanical difficulties, or other similar instances). All approved Standing Operating Procedures (SOPs), work plans, checklists, maps of the project site, a copy of the Chemical Safety Submission (CSS) and approval documents, environmental requirements, security plan, and other documentation will be provided to team members prior to the Survey. Any documentation needed by or requested by Survey team members will be made available on site or, if requested, prior to the Survey. Fourteen days prior to the projected date of the Survey, the PM will provide 5 CDs with copies of all site documents discussed above to the MM CX for distribution to the Survey Team Members.

e. Deliberate unearthing, exposing, accessing, or contacting RCWM is not permitted until all required CSS approvals are obtained and a Survey has been successfully completed.

f. Operational personnel will perform a dry run in the presence of MM CX and Site Safety personnel prior to the restart of any RCWM operation that has not been conducted in the last 90 days. The MM CX, in coordination with project safety personnel, will determine the actions required to verify readiness. These actions will be based on the scope of operations and length of delay between the initial Survey and the re-start of operations and may result in conducting another Survey.

g. See Glossary for definitions and Attachment A for references and sources of information.

2. Applicability.

a. These requirements and procedures are applicable to all RCWM response activities. These requirements and procedures do not apply to RCWM emergency response actions, nor do they apply to stockpile activities, which are covered under AR

385-61. In addition, while requirements for Surveys of systems used for the disposal of RCWM are covered under AR 385-61, the interrelation between the disposal system and RCWM removal actions is subject to these requirements and procedures.

b. Changes in plans or operations that result in a greater hazard may require a follow-on Survey to assess safety, health, and readiness. In such situations, the MM CX, in coordination with project safety personnel, and others, as necessary, will determine the requirement for subsequent Surveys.

3. Survey Preparation. Key considerations in preparing for a Survey are coordinating, planning, defining the scope of the Survey, selecting a qualified Survey team, and developing a Survey plan. Planning timetables are provided at Appendix B for a Survey. A typical sequence of events associated with preparation for the Survey is as follows:

a. The PM, considering the progress toward operational readiness, initially coordinates the Survey date. This information will be provided to the MM CX to facilitate early planning for the Survey. Early coordination with the MM CX, even though the actual date may not be available, is important to facilitate planning and for coordination with external agencies which will be asked to participate. The PM will provide funding to MM CX and/or team members necessary for Survey activities.

b. Two weeks prior to the start of the Survey:

(1) MM CX will prepare a Survey plan. The plan will be written to reflect the scope of work and site-specific objectives, identify the personnel who will be members of the Survey team, and provide a general schedule for Survey team activities. Survey plans will include a comprehensive list of areas specific to the operation to be surveyed. The plan will be used to assure completeness of the Survey. A guide for selecting functional areas for inclusion in the Survey plan is at Appendix C. Survey plans establish personnel requirements and requirements for the use of technical specialists to accomplish the Survey. Personnel will be selected for specific assignments based on experience and training which are commensurate with the complexity and special nature of the activities being surveyed. The plan will be provided to the PM, and others as appropriate, for review and comment.

(2) The Survey team leader will certify to the site PM that all Survey team members have completed 40 hours of Hazardous Waste Operations and Emergency Response (HAZWOPER) training, and required refresher training, and have respirator/medical clearance. Survey team members must provide documentation to the Survey team leader so he or she can certify to the PM that team members are trained and cleared.) Exceptions to this requirement (e.g., subject matter experts brought on-site for limited duration to investigate a particular aspect of the Survey) require approval of the executing USACE District Safety and Occupational Health Office. Each team member is required to wear the appropriate personal protective equipment required by the site safety and health plan to include OSHA approved safety footwear while conducting the Survey.

c. One week prior to the start of the Survey:

(1) The PM will submit a memorandum to MM CX detailing the status of

preparation of the project site for the Survey and the status of the required documentation (CSS, Work Plan, etc.), in accordance with Attachment B of this guidance. Milestones will be provided for all required items not completed. At this time, the MM CX, in coordination with the PM, will determine if the Survey can be conducted on the date scheduled or must be re-scheduled.

(2) The Survey team leader will verify that all Survey team members have copies of the final approved version of the CSS (usually digital) via e-mail or telephone. The copies will be federal express shipped to the team members IAW Attachment B.

d. The PM will certify telephonically to the MM CX that the project is ready for the Survey. The Survey will not begin until the PM has made this verification.

4. On-Site Activities.

a. The first day of the Survey, the Survey team leader will meet with the Survey team members to designate roles, areas of responsibility, and to ensure all Survey team members understand how the category of Non-conformances/Observations will be determined.

b. An entrance interview will be held with the PM (and others as mutually agreed to by the PM and the Survey team leader). The purpose, scope, schedule, and requirements of the Survey will be discussed and administrative support requirements associated with the Survey will be agreed upon. The types of simulations permitted and the ground rules for conducting the Survey will be provided, in writing, by the Survey team leader to the PM. If previously agreed to by the PM and the Survey team leader, participation in the Survey may be opened to other interested parties (however, the PM is responsible for ensuring visitor compliance with safety and work plan requirements).

c. Daily out-briefs will be conducted so that the Survey team leader can discuss the Non-conformances/Observations related to that day's activities with the PM (and others as determined by the PM and the Survey team leader); all supervisors of the organizations who are responsible for correcting Non-conformances/Observations should be represented. Attendance at, and duration of, this meeting will be held to the minimum necessary.

d. The Survey team members will review the following activities/documents during the Survey:

(1) Plans, procedures, and other relevant documentation (including Material Safety Data Sheets (MSDSs), SOPs, laboratory procedures, and contingency plans) will be reviewed for availability, consistency with the CSS, and compliance with applicable regulations.

(2) Memorandums of Agreement (MOAs) or Memorandums of Understanding (MOUs), explosives storage licenses, pending and existing contracts (as applicable), and other permits, as applicable, will be reviewed for completeness and accuracy.

(3) System test reports and approvals, as necessary and as cited in the pre-op

Survey plan, will be reviewed for completeness and accuracy.

(4) Training records will be reviewed to verify the appropriateness of training subjects.

(5) Respirator issue documentation will be reviewed to verify completion of medical screening and respirator approval.

(6) All pertinent facilities and equipment (e.g., support facilities, interim holding facility,
laboratory, fire support, medical support, utilities, warehouses, offices, etc.) will be inspected to verify consistency and compliance with the CSS and supporting documentation.

(7) All portions of the operations are subject to being witnessed by the Survey team. The

contractor and support personnel must be prepared to conduct operations with the minimum number of simulations, but live chemical agents or explosives will not be processed during the Survey. All simulations must be approved by the Survey team leader prior to beginning the Survey.

(8) Emergency response plans will be exercised and evaluated for effectiveness, consistency and compliance with the CSS and supporting documentation, and availability of, and employee familiarization with, required emergency equipment. Emergency response exercises may include any of the following, individually, or in combination:

(a) Agent detected in selected areas of the site.

(b) Agent exposure to one or more workers.

(c) Explosion with or without agent release/contamination.

(d) Industrial accident requiring a response from the medical support.

(e) Accident requiring extraction of a worker.

(f) Loss of utilities.

(g) Fire.

(9) The wearing of Personal Protective Equipment (PPE).

(10) The use of monitoring equipment during the Survey.

e. At the conclusion of the Survey, the Survey team will prepare a draft report. (See Appendix D for report format.) The report will contain narrative related to the Survey conduct, Non-conformances/Observations, recommendations, and conclusions. Non-conformances/-Observations will be presented on Survey Worksheets (Appendix E) and

will be designated as follows:

(1) Category 1 - Items which are considered essential to the safety of personnel or the environment or the operational readiness of the system. These items must be resolved before the start of operations. Approval can be delegated to an appropriate person as determined by the Survey team leader, however it is anticipated the Survey team leader will remain on-site until all Category 1 findings have been resolved.

(2) Category 2 - Items which are not considered immediately essential to the safety of personnel or the environment or the operational readiness of the system, but which must be corrected. Category 2 Non-conformances/Observations must be resolved as soon as practical. A suspense date for correction of these items will be established before project site operation activities begin. A point of contact for reporting correction of category 2 Non-conformances/Observations will be specified in the Survey report.

(3) Category 3 - Items which were noted by the Survey team, but which were corrected

while the Survey was being conducted. No additional response is required.

(4) Category 4 - Items that were noted by the Survey team, but which are not categorized as 1, 2, or 3. No response is required.

f. An exit briefing will be conducted for the PM on the last day of the Survey. Attendance at the briefing may be opened to others, if previously agreed to by the Survey team leader and the PM.

g. Actions Following a Survey.

(1) The Survey team leader may remain on site at the conclusion of the Survey to verify resolution of Non-conformances/Observations.

(2) The final Survey report will be prepared by the Survey team leader within one week of Survey completion. Information copies will be provided to the site PM, CESO, and each Survey team member. In some cases, on-site validation may be necessary and may require repeating some or all phases of the original Survey. The determination will be reflected in the final Survey reports. On-site validation may delay the final Survey report until Non-conformances/Observations are satisfied.

(3) After the PM provides the MM CX written evidence of resolution of all category 1 recommendations and plans have been established for resolution of all category 2 recommendations, the MM CX will notify CESO the Survey has been successfully completed. Commander, USAESCH, upon satisfaction that the CSS has all required approvals and that category 1 and category 2 findings are properly resolved, will give approval to begin site operations.

Glossary

Chemical Safety Submission (CSS): The document that serves as the specifications for conducting work activities at the project. The CSS details the scope of the project, the planned work activities, and potential hazards (including the MCE) and the methods for their control.

Chemical Warfare Materiel (CWM): An item configured as a munition containing a chemical substance that is intended to kill, seriously injure, or incapacitate a person through its physiological effects. Also includes V- and G-series nerve agent, H-series blister agent, and lewisite in other-than-munition configurations; and certain industrial chemicals (e.g. hydrogen cyanide (AC), cyanogens chloride (CK), or carbonyl chloride (called phosgene or CG) configured as military munitions. Chemical agent identification sets are considered CWM.

Deliberate unearthing/exposing: Intentionally exposing an item.

Non-conformance: Deviation from a written requirement.

Observation: Deviation from expected performance or a noted opportunity for improvement.

PM: The USACE individual with responsibility for managing a RCWM project.

Readiness review: A local activity, which includes process demonstrations, to assure that a system is ready to successfully undergo a Survey.

Recommendation: A method the Survey team believes will satisfy the intent of the associated non-conformance or observation. Unless otherwise noted, recommendations are not mandatory in detail.

Recovered chemical warfare materiel (RCWM): Non-stockpile CWM that was previously discarded, buried, or fired and discovered either unexpectedly or during planned environmental restoration projects. RCWM does not fall within the scope of the Army Chemical Surety Program.

RCWM response action: The planned, longer-term remediation of an area known or suspected to contain RCWM, in accordance with DERP procedures; may be preceded by time-critical or non-time critical removal activities. Incorporates the planned progression through the four phases of hazard identification, site investigation, response, design and cleanup, and site closeout.

Survey: A formal review/assessment of a response action project immediately prior to beginning RCWM and/or explosives operation activities. Surveys may also be applied to activities involving other hazardous materials when appropriate. In this guidance document, this term encompasses RCWM Surveys and readiness reviews.

Attachment A

References

1. AR 385-61, The Army Chemical Agent Safety Program

2. DA Pam 385-61, Toxic Chemical Agent Safety Standards

3. DASA(ESOH) memorandum dated 5 Sep 1997, SUBJECT: Biological Warfare Materiel and Non-Stockpile Chemical Warfare Materiel Response Activities

4. 29 CFR 1910, Occupational Safety and Health Standards

5. DOD 6055.9-STD, DOD Ammunition and Explosives Safety Standards

6. AR 50-6, Chemical Surety

7. AR 385-64, U.S. Army Explosives Safety Program

8. DA Pam 385-64, Ammunition and Explosives Safety Standards

9. AR 200-1, Environmental Protection and Enhancement

10. 40 CFR Part 260, et al. Military Munitions Rule: Hazardous Waste Identification and Management; Explosives Emergencies; Manifest Exemption for Transportation of Hazardous Waste on Right-of-Ways on contiguous properties; Final Rule

11. EP 75-1-3, RCWM Remedial/Response Actions.

12. Memorandum, DASA-ESOH, dated 29 Mar 2004, SUBJECT: Assignment of Responsibility for Conduct of Surveys for USACE-led Response Actions involving Chemical Warfare Materiel.

13. Memorandum, HQ, USACE-CESO-E, 25 Mar 2003, SUBJECT: HQs, COE Delegation of Authority.

14. Memorandum, HQ, USACE-CESO-E, 5 Apr 2004, SUBJECT: Assignment of Responsibilities for Conduct of Surveys for USACE-Led Response Actions involving Chemical Warfare Materiel.

Attachment B

Planning Timetable for Pre-Operational Surveys

Action	Time	Responsible Office/Individual
Pre-coordination	ASAP	PM
Preliminary request for Survey to MM CX Determine if Survey can be conducted as scheduled	5 weeks before Survey	PM MM CX, CESO
Prepare Survey plan (using CSS, WP/SSHP, and SOPs) Memo to MM CX detailing status of preparation for Survey and status of required documentation. Provide copies of final approved CSS, Work Plan, and Site SOPs to Survey team leader as required (normally 5 copies on CD) Survey plan to Survey team members	2 weeks before Survey	MM CX PM PM MM CX
Certify site readiness to MM CX telephonically	1 week before Survey	Site PM
Review final documentation	1 week before Survey	Survey team members
Initial team meeting	First day of scheduled Survey	Survey team leader
Entrance interview with site PM	First day of scheduled Survey	Survey team leader
Daily outbriefs	The last part of each Survey day	Survey team
Conduct the Survey	(usually 1 week in duration)	Survey team
Draft Survey report	Before exit briefing	Survey team
Exit briefing	Final day of scheduled Survey	Survey team leader
Final report Notification of successful completion to CESO	1 week after Survey	MM CX MM CX
Authorization to operate	After category 1 recommendations are resolved and MM CX recommendation obtained	Commander, USAESCH

Attachment C

Sample Pre-Operational Survey Guide

Operation-specific Survey plans will be developed for each Survey. Examples of items that might be included in a plan are provided below. This list should not be considered all-inclusive, nor should any item be included in an operation-specific Survey plan solely because it appears here.

Documentation
SOPs correct, approved, signed, and appropriately available at the work site
Chemical Safety Submission (CSS) current and approved
Contingency procedures approved
Site monitoring plan approved
Hazards analysis completed and all identified hazards managed appropriately
Hazard tracking log maintained
Training records complete and personnel appropriately certified
Operational test records for monitoring systems
Preventive maintenance plan complete and adequate
Preventive maintenance records available and accurate
Environmental compliance documentation complete
Policies in place for deviations from approved procedures
Data collection system adequate; all significant items recorded
Calibration and test records adequate
Identification of decontaminated items
Agent/munition accountability procedures/records
Waste Management Plan
Chemical Hygiene Plan
Test reports of engineering controls

Facilities and Equipment
System/process equipment properly operational
Monitoring and detection equipment in place and functioning properly
Equipment properly calibrated and marked
Decontamination systems adequate
Material handling equipment properly maintained and operated
Porous material in potentially contaminated areas minimized
Tools used in potentially contaminated areas segregated and marked

Operations/Maintenance
Emergency notification procedures demonstrated and adequate
Operator proficiency demonstrated
Maintenance proficiency demonstrated
Laboratory and monitoring procedures demonstrated
Adequacy of communications demonstrated
Protective clothing selection, inspection, and use demonstrated

Contingency
Emergency Operations Center
Communications
Handling of agent contaminated casualties
Loss of utilities
Industrial accident
Agent alarm
Non-agent alarm
Leaker detected
Hot line equipment and procedures
HAZMAT response
Knowledge/communication of muster points
Personnel accounting

Safety
Compliance with Occupational Safety and Health Administration standards
Electrical equipment properly rated and installed
Emergency showers and eyewashes properly located, marked/identified, and function tested
Lifting devices load/function tested, marked, and records maintained
Noise hazard areas marked and hearing protection available
Eye hazard areas marked and eye protection available
Proper labeling of chemicals
Current MSDSs are available
Respirators (to include SCBA) properly fit tested
Documentation of breathing air (Grade D or better)
Proper storage for flammable materials
Hand held fire extinguishers available
Personnel and explosives limits posted and observed
Explosives and chemical agent placarding
LPS (down conductors, air terminals, etc.)
Safety responsibilities properly located in the management structure
Eating, drinking, and smoking areas identified and approved
Mask fitting procedures
Criteria for change-out of mask canisters
First aid kits available where necessary

Environmental
Hazardous material and waste properly stored and labeled
90-day accumulation sites properly identified
Compliance with all RCRA, CAA, CWA, TSCA requirements and Permit Conditions
Spill cleanup kits properly constituted and located
Record keeping
Environmental inspections accomplished

Medical Support Operations
Training/certification of medical personnel
Manning levels adequate

Facilities and equipment adequate
Necessary support in place
Record keeping
Pre-employment physicals
Medical evaluations of potentially exposed individuals, as a result of the Survey simulated exposure

Security Support Operations
Access control/Entry Control Rosters
Key control
Security lighting
Guard orders

Fire Support Operations
Equipment
Personnel manning level
Response time
Fire inspections

Storage Facility (Interim Holding Facility Area)
Assessment Holding Facility
- Glovebox
- Engineering Controls
- Inventory Records
- Standing Operating Procedures

Munitions Assessment Review Board Holding Facility
Interim Holding Facility
- Inventory records
- Operations
- Standing Operating Procedures

Magazines
- Licensed
- Site approval
- Inventory Records
- Hazard symbols
  - Access control

Attachment D

Format for a Survey Recommendation to Approving Authority

1. Prepare in a memorandum format:

a. Title Page: Include project title, site location and organization, as appropriate, and signatures indicating submittal and approval of the report.

b. Introduction: Statement of purpose of the Survey

c. Background: Dates and facts pertinent to the Survey (briefings, meetings, notifications, etc.)

d. Team members

e. Scope: A statement of what was included and what was excluded from the Survey

f. General: When appropriate, any other comments bearing on the Survey or its result

g. Non-conformances/Observations: Each Non-conformance or Observation must be supported by a recommendation for improvement. A worksheet and instructions are at Attachment E.

h. Conclusions. The assessment of the Survey team leader regarding the ability of the operation to proceed in a safe and efficient manner.

ATTACHMENT E

Pre-Operational Survey Worksheet	Item No:
1. Location:	**2. Name of Survey Team Member:**
3. Description of Observation or Action:	
4. Reference/Recommendation: **(For non-conformances, reference specific requirement in this block)**	
5. Survey Report Category: (mark appropriate category) 1 Must be closed prior to recommendation to start operations 2 Corrective Action/improvement plan must be accepted prior to recommendation to start operations 3 Corrected and closed during the Survey; no additional response required 4 No Response required	
6. Response:	
7. Response provided by: _____ _____ _____ (Name and Org) (Signature) (Date)	
8. Evaluation of corrective action/improvement: **(Check one)** Satisfactory _____ _____ Unsatisfactory (Signature) (Date)	
9. Closed: Survey Team Leader: _____ _____ (Signature) (Date) Starting category: _____ Final category: _____	

Instructions

Block	Instructions
Item No.	Assigned by survey team chairman. Identifying numbers will have the form yyyy-xxx#-zzzz, where: yyyy = calendar year survey was conducted, xxx# = a three-letter code to identify the location with a single number to uniquely identify this survey, usually assigned sequentially, as scheduled. For surveys that are conducted in phases, a letter corresponding to the phase will be included zzzz = a sequential number assigned to worksheet Example: 2004-SIB-01 (First Worksheet for the Camp Sibert Pre-Op conducted in 2004) Note: Worksheets for a survey report will be numbered sequentially, without gaps. If a number in the sequence is not used for some reason, a placeholder worksheet will be included with that number and descriptive verbiage to identify that fact.
1	Location of Project Site
2	Name of team member who noted the condition.
3	Note the observation or action.
4	If the observation is a non-conformance action, a reference is required. The reference may include a brief restatement of the requirement. Include a recommended corrective action. A non-conformance finding is one that the action is required by a project document and not being accomplished.
5	Marked by the Survey Team Leader after consultation with team members.
6	The response from the project team to the observation and corrective action done to resolve the finding.
7	Which Project Team Member provided the response/corrective action..
8	The Survey Team Member who made the observation, or the Survey Team Leader will observe/review the corrective action and check the appropriate section (Satisfactory or Unsatisfactory)
9	The Survey Team Leader will close out the finding/observation in this block. Both the starting category of the finding/observation and final category will be annotated.

Note: It is intended this form be filled out in longhand, not to be typed in, and signatures of appropriate personnel on the form.