

United States Government

Department of Energy

memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221

DATE: March 20, 2002

 REPLY TO
 ATTN OF: CBFO:QA:ALH:GS:02-0692:UFC 2300.00
SUBJECT: Interim Change to Management Procedure 3.1, Rev. 6, *Corrective Action Reports*

TO: Distribution



The following interim change to CBFO Management Procedure 3.1, Revision 6, *Corrective Action Reports* is effective immediately. These changes are intended to clarify the assignment of the CAR number and to make the process more effective.

1. (New paragraph) 4.8.1, add the sentence, "Provide CAR number when requested."
2. Change the numbers of paragraphs 4.8.1, 4.8.2, 4.8.3, 4.8.4, 4.8.5, to 4.8.2, 4.8.3, 4.8.4, 4.8.5, 4.8.6 respectively.
3. Paragraph 5.1.3 after the words "team leader" add the words "or designee".
4. Add to beginning of paragraph 5.1 the words, "If the CAR is valid, obtain the CAR number from the CAR coordinator and enter it in CAR block 1."
5. Delete the third sentence from paragraph 5.1.5, "Accelerated corrective action is not mandatory for transportation related deficiencies except at the discretion of the CBFO Manager."
6. Delete words to paragraph 5.1.8 **NOTE:** Section B. "If the QAM concurs with an ATL recommendation to suspend work, the...", delete the word "the".
7. Change words to 5.1.8 **NOTE:** Section C. In first sentence add the following words, "for implementing the..." after the words "...determine the appropriate method..." and delete the words "of recommending a".
8. Delete from paragraph 5.2.1 the words "obtain a CAR number from the CAR coordinator, enter the CAR number in block 1 of the CAR form and".
9. Add to Attachment 1 on the *Correction Action Form Example*, a question mark after sentence in 11a through 11d. Also, line up the (Yes or No) column.
10. At the bottom of the *Instructions for Completing the CAR* form (Attachment V) under "ATL" in the list of acronyms change the word "Assurance" to the word "Assessment".

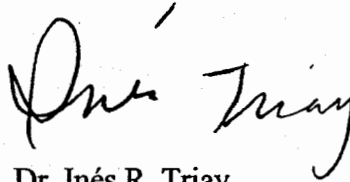
020318



Distribution

-2-

If you have any questions concerning these changes, please contact Meg Milligan at 505-234-7340.

A handwritten signature in black ink, appearing to read "Inés R. Triay". The signature is fluid and cursive, with a large initial "I" and a long, sweeping underline.

Dr. Inés R. Triay
Manager

Distribution:

A. Holland, CBFO
L. Chism, CBFO
M. Milligan, CBFO
K. Watson, CBFO
B. Smith, CBFO
B. Lilly, CBFO
C. Zvonar, CBFO
G. Basabilvazo, CBFO
M. Horseman, CTAC
A. Prangle, CTAC
M. Eagle, EPA
S. Zappe, NMED
CBFO Mailroom



CBFO MANAGEMENT PROCEDURE Carlsbad Field Office

MP No. 3.1 Page 1 of 16

Revision 6

Title: **CORRECTIVE ACTION REPORTS**

Manager, Carlsbad Field Office

Ines Tray

Date: *1/23/02*

1.0 PURPOSE

This procedure establishes responsibilities and defines the method for initiating and processing corrective action reports (CARs) to ensure that effective measures are implemented to correct Carlsbad Field Office (CBFO) and participant deficiencies identified by CBFO. CARs are used to identify and correct conditions adverse to quality.

2.0 SCOPE

This procedure applies to CBFO personnel who initiate, track, and verify the completion of corrective actions, and close CARs issued by CBFO. It also applies to those CBFO personnel who investigate, correct, and prevent recurrence of the deficiencies identified in the CARs. This procedure shall be used when CBFO identifies a condition adverse to quality involving a CBFO or participant's process, service, or product. This procedure also provides instructions related to tracking CARs initiated by transuranic (TRU) waste sites. This procedure supercedes MP 3.1, revision 5 Corrective Action Reports."

3.0 REFERENCES AND DEFINITIONS

3.1 References

- 3.1.1 DOE CBFO-94-1012, *CBFO Quality Assurance Program Document (QAPD)*
- 3.1.2 CBFO Management Procedure, (MP) 1.2, *Selection of Quality Levels*
- 3.1.3 CBFO MP 4.5, *Generating, Receiving, Storing, and Controlling Active CBFO Project Records*
- 3.1.4 CBFO MP 4.9, *Quality Assurance Records*
- 3.1.5 CBFO MP 10.2, *Surveillances*
- 3.1.6 CBFO MP 10.3, *Audits*
- 3.1.7 CBFO Team Procedure (TP) 3.2, *Trend Identification and Reporting*
- 3.1.8 *WIPP Hazardous Waste Facility Permit*

3.2 Definitions

- 3.2.1 Assessment Team Leader - The leader of a CBFO quality assurance, environmental, or safety and health assessment activity. When the assessment team leader is not a CBFO staff member, CAR processing responsibilities are fulfilled by the CBFO initiating team leader, or by someone designated by the initiating team leader.
- 3.2.2 CAR Coordinator - The CBFO staff member assigned responsibility for administration of the CAR process, maintenance of the CAR log, and tracking waste generator site-initiated CARs.
- 3.2.3 Condition Adverse to Quality - Term used in reference to failures, malfunctions, deficiencies, defective items, and nonconformances (including technical inadequacies).
- 3.2.4 Corrective Action - Measures taken to rectify conditions adverse to quality and, where necessary, to preclude recurrence.
- 3.2.5 Corrective Action Report - A document utilized to identify and document conditions adverse to quality (CAQ) and track the associated corrective actions.
- 3.2.6 Corrective Action Report Initiator - Anyone identifying a condition adverse to quality and reporting that condition on a CAR form for resolution.
- 3.2.7 Compliance Certification Application - Criteria related to certification/re-certification, or any actions concerning the terms and conditions of certification of DOE WIPP's compliance with 40 CFR 191/194.
- 3.2.8 Corrective Action Verifier - The individual responsible for verification of corrective action completion, and the assignment of trend cause codes.
- 3.2.9 Currently Certified TRU Waste Site Process - A process for which a TRU waste site has received formal, written approval from CBFO for characterization, certification, or transportation of TRU waste to WIPP.
- 3.2.10 Initiating Team Leader - The CBFO staff member who initiates, schedules, and oversees a CBFO assessment. The initiating team leader fulfills the responsibilities for an assessment team leader.
- 3.2.11 RCRA Related Deficiency - A deficiency that is a violation of the requirements of the WIPP Hazardous Waste Facility Permit.
- 3.2.12 Responsible Organization - The organization responsible for correcting the condition adverse to quality.
- 3.2.13 Significant Condition Adverse to Quality - A condition which, if uncorrected, could have a serious effect on safety, operability, waste confinement, TRU waste site certification, compliance demonstration, or the effective implementation of the Quality Assurance (QA) program.
- 3.2.14 Transportation Related Deficiency - Any nonconformance to procedures or requirements related to the packaging and transportation of waste to WIPP.

- 3.2.15 Work Suspension Recommendation - A recommendation provided to a project or organization to suspend work until such time as corrective measures are implemented. A work suspension recommendation may be issued as a result of a significant condition adverse to quality. The formality of notification depends on the specific contractual arrangements.
- 3.2.16 WIPP Operating Record - Records maintained at the WIPP facility as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73) and the WIPP Hazardous Waste Facility Permit.

4.0 RESPONSIBILITIES

4.1 CBFO Manager

- 4.1.1 The CBFO Manager maintains overall responsibility for the implementation of the process described in this procedure.
- 4.1.2 The CBFO Manager is also responsible for evaluating and approving requests to extend corrective action completion dates for CARs related to CBFO certified processes at the TRU waste sites.

4.2 CBFO Assistant Managers (AMs)

The CBFO assistant managers (AMs) are responsible for ensuring that CAR resolution is accomplished in a timely and effective manner, and concurring with the method of work suspension recommendations. When a CAR is initiated outside of a CBFO assessment activity and there is no associated assessment team leader or initiating team leader, the AM who supervises or exercises oversight of the CAR initiator shall ensure that the responsibilities contained in sections 4.3 and 4.4 below are fulfilled.

4.3 Initiating Team Leader

The CBFO initiating team leader is responsible for performing the following corrective action activities:

- 4.3.1 Ensuring that the CAR process responsibilities of the assessment team leader are fulfilled whenever an assessment is led by someone other than a CBFO staff member.
- 4.3.2 Ensuring that all assessment team personnel receive adequate familiarization and training on this management procedure.

4.4 Assessment Team Leaders

CBFO assessment team leaders are responsible for the following CAR process activities. If the assessment team leader is not a CBFO staff member, or is no longer available, the initiating team leader shall ensure that these responsibilities are fulfilled:

- 4.4.1 Reviewing, approving, and transmitting CARs that result from their assessments.
- 4.4.2 Approving the proposed corrective actions for CARs.
- 4.4.3 Monitoring the corrective action process for CARs resulting from their assessments.
- 4.4.4 Evaluating and approving requests for extension of the response due date and the corrective action completion dates (see Section 4.1 for additional information).

4.4.5 Reviewing verification information of CARs resulting from their assessments.

4.4.6 Ensuring that the CBFO CAR coordinator receives copies of correspondence relating to the processing and resolution of CARs.

4.4.7 Determining if CARs require accelerated corrective action.

4.5 QA Manager

The CBFO QA Manager is responsible for the following actions:

4.5.1 Recommending work suspension when necessary.

4.5.2 Assuring compliance with this procedure by closing all corrective action reports.

4.6 Assistant Manager, National TRU Program (NTP)

Evaluating the impact of CARs requiring accelerated corrective action on TRU waste received at WIPP or proposed for shipment to WIPP.

4.7 CAR Initiator

When the CAR initiator is a non-CBFO staff member, the interface with the responsible organization shall be coordinated through the assessment team leader for CAR preparation transmittals, overdue notifications, extension approvals, response evaluations, and corrective action verifications. The CAR initiator shall perform the following actions:

4.7.1 Completing blocks 2 through 13 (less item 11b) of the CAR form (attachment I).

4.7.2 Reviewing proposed corrective actions for CARs and making a recommendation to the assessment team leader concerning the acceptability of the response.

4.8 CAR Coordinator

The CAR coordinator is responsible for the following actions:

4.8.1 Managing the CBFO CAR reporting and tracking system, reporting the status of CARs, and tracking waste generator site-initiated CARs.

4.8.2 Notifying the assessment team leader when CAR responses or corrective action completions are overdue.

4.8.3 With the concurrence of the assessment team leader, preparing and issuing a memorandum to the responsible organization when CAR responses or corrective action completions are overdue.

4.8.4 Preparing the CAR records package in accordance with section 6.0, *Records*, and ensuring that CAR record packages are complete and properly maintained.

4.8.5 Developing an overdue CAR listing and distributing it to the CBFO QA Manager and the organizations responsible for corrective action, at least monthly.

4.9 Corrective Action Verifier

Responsible for verifying corrective action completion and assigning the appropriate trend cause code (block 19b).

5.0 PROCEDURE

Note: Instructions for completing the CAR forms are included in attachment V.

5.1 Corrective Action Report Initiation

A CAR form (attachment I) shall be initiated to document conditions adverse to quality.

- 5.1.1 Individuals identifying a condition adverse to quality shall discuss the condition with the appropriate members of the responsible organization (CAR block 7) and shall initiate a CAR, using the CAR form and the continuation sheet (attachment I).
- 5.1.2 The CAR initiator shall complete CAR blocks 2 through 13 (excluding 11b) and forward the CAR to the assessment team leader.
- 5.1.3 The assessment team leader shall review the condition and determine if the CAR is valid.
- 5.1.4 If the assessment team leader determines the CAR is not valid, the CAR shall be returned, unsigned, to the initiator along with an explanation of the determination.
- 5.1.5 The assessment team leader shall determine if accelerated corrective action is required. Accelerated corrective action is required if the CAR documents a significant condition adverse to quality or RCRA-related deficiency in a process currently certified by CBFO at a TRU waste site. Accelerated corrective action is not mandatory for transportation-related deficiencies except at the discretion of the CBFO Manager. CARs not related to processes currently certified by CBFO at the TRU Waste Sites shall not be marked for accelerated corrective action.
- 5.1.6 The assessment team leader will determine if a corrective action plan is required. Corrective action plans are required for RCRA-related deficiencies and significant conditions adverse to quality. They are optional for all other deficiencies.
- 5.1.7 When the assessment team leader determines the CAR is valid, the assessment team leader shall indicate, in CAR block 11b, whether a work suspension recommendation is required, and assign a response due date in CAR block 14, allowing the responsible organization a maximum of thirty (30) days after receipt of the CAR. If block 11d is marked "yes", a corrective action completion date no more than 30 days from receipt of the CAR by the responsible organization shall be assigned.
- 5.1.8 The assessment team leader shall indicate concurrence with the CAR content by signing in CAR block 15.

NOTE: A. Deficiencies determined to be significant or RCRA-related require a corrective action response that addresses all four types of actions indicated in CAR block 12.

- B. The Quality Assurance Manager shall determine whether a work suspension is required and sign CAR block 15. The Quality Assurance Manager shall notify the appropriate AM. If the QA Manager determines that a work suspension is not required, the QA Manager will sign in block 15, and N/A the AM signatory line.
- C. The Quality Assurance Manager, with the aid of the AM, shall determine the appropriate method of recommending a work suspension. The AM will concur with the method of work suspension by signing CAR block 15.
- D. If the AM and the Quality Assurance Manager are not in agreement with the need for work suspension or the method of work suspension, the issue shall be elevated to the CBFO Manager.
- E. If a work suspension recommendation is required, the CAR shall serve as the tracking document.
- F. If the CAR is not a significant condition adverse to quality, the assessment team leader shall N/A the quality assurance manager and assistant manager signatory lines in CAR block 15.

5.2 CAR Issuance

- 5.2.1 Once the CAR is approved for issuance, the assessment team leader shall obtain a CAR number from the CAR coordinator, enter the CAR number in block 1 of the CAR Form, and prepare a transmittal package containing:
 - A. A copy of the CAR
 - B. The CAR transmittal memo if the responsible organization is external to CBFO. (No memo is required for internal CBFO CARs)
 - C. A CAR continuation sheet (attachment I) with items 1 to 3 completed and an instruction sheet for preparing the CAR response (attachment II).
- 5.2.2 The assessment team leader shall transmit the package to the responsible organization, and the original CAR to the CAR coordinator for retention in the CAR file.
- 5.2.3 CARs requiring accelerated corrective action (i.e., block 11d is marked "yes") will also be transmitted, upon issuance, to the NTP AM for impact evaluation as described in paragraph 4.6. These CARs should also be forwarded to the New Mexico Environmental Department (NMED) and the Environmental Protection Agency (EPA), as appropriate.
- 5.2.4 The CAR coordinator shall maintain the CBFO Corrective Action Report Log (attachment III). The CAR log shall contain the following status and tracking information, as appropriate:
 - A. CAR number (CAR block 1)
 - B. Activity number (e.g., surveillance, observation, audit, etc.), if applicable (CAR block 2)
 - C. Description of the adverse condition (CAR block 9)
 - D. Responsible organization (CAR block 6)
 - E. CBFO assessment team leader (CAR block 5)
 - F. Date issued (CAR block 13)
 - G. Date response due (CAR block 14)
 - H. Date response received

- I. Date response accepted (CAR block 17)
- J. Date actions are expected to be completed
- K. Date verified (CAR block 19a)
- L. Cause code (CAR block 19b)
- M. Date closed (CAR block 20)
- N. RCRA related
- O. Accelerated Corrective Action Required

5.3 Corrective Action Response

- 5.3.1 A corrective action response shall be prepared by the responsible organization addressing each checked item in block 12.
- 5.3.2 If the responsible organization cannot provide an acceptable corrective action response before the response due date, the responsible organization shall respond with an expected completion date. The assessment team leader shall approve the extension if warranted. Verbal extension requests shall be followed up by a written extension request. If the extension request is approved, the assessment team leader shall notify the responsible organization in writing, with a copy to the CAR coordinator, who shall update the CAR Log.
- 5.3.3 If a response is not received by the response due date, the CAR coordinator shall notify the assessment team leader and the responsible organization of the overdue status.
- 5.3.4 If a corrective action plan is not required, as indicated in Block 14 of the CAR form, the responsible organization shall notify the Assessment Team Leader of the anticipated corrective action completion date.

5.4 Response Evaluation

- 5.4.1 Upon receipt of the corrective action response from the responsible organization, the assessment team leader shall transmit the response to the CAR initiator (or another staff member knowledgeable of the condition) for review, with a copy to the CAR coordinator. The CAR initiator, or designee, shall evaluate the proposed actions to ensure that the plan properly addresses the deficiency, contains expected completion dates, and assigns responsibilities for the completion of the corrective actions. Once the review is completed, the CAR initiator, or designee, shall provide to the assessment team leader a recommendation for acceptance or rejection of the proposed actions.
- 5.4.2 The assessment team leader shall review the CAR response and the recommendations from the CAR initiator. If acceptable, the assessment team leader shall sign block 17 of the CAR.
- 5.4.3 If the response is complete and acceptable, the assessment team leader shall issue a response acceptance transmittal to the responsible organization, with a copy to the CAR coordinator.
- 5.4.4 If the response is not acceptable, the assessment team leader shall document the reason for non-acceptance on a CAR continuation sheet, and prepare a memo to the responsible organization along with a new response due date, with a copy to the CAR coordinator.
- 5.4.5 The CAR coordinator shall update the CAR log with the new information.

5.4.6 If, at any point in the CAR process, resolution of issues cannot be reached, the matter shall be elevated to successive levels of management until resolution is attained (e.g., team leaders, assistant managers, and the CBFO manager).

5.5 Corrective Action Completion

5.5.1 The responsible organization shall:

- A. Complete the actions required to correct the deficiency.
- B. If it becomes evident that the actions will not be completed prior to the established due date, submit a request for extension to the assessment team leader for approval. The request shall include a justification for the extension.
- C. Transmit the evidence of corrective action completion to the assessment team leader prior to the completion date.

5.5.2 If the CAR requires accelerated corrective action (i.e., block 11d marked "yes") and the responsible organization cannot complete corrective actions within 30 days of receipt of the CAR, the responsible organization shall submit a detailed justification to the CBFO Manager requesting an extension to the due date.

5.5.3 The assessment team leader is responsible for monitoring the status of the responsible organization's corrective actions.

5.5.4 For CARs that require accelerated corrective action, the assessment team leader shall recommend, in writing, to the CBFO Manager that TRU waste site certification be suspended if corrective action response or completion is untimely.

5.5.5 The CBFO Manager shall determine if TRU waste site certification should be suspended. The TRU waste site shall be notified, in writing, if certification is suspended. If certification is not suspended, the CBFO Manager will notify the Assessment Team Leader, in writing, and include a description of the basis for not suspending certification. NMED and/or EPA, as appropriate, should be notified of the decision to suspend or not suspend TRU waste site certification.

5.6 Verification of Corrective Action Completeness

Note: CARs issued to address technical deficiencies should be verified by a qualified technical specialist. CARs resulting from QA deficiencies should be verified by a QA auditor.

5.6.1 The corrective action verifier shall:

- A. Upon completion of corrective actions, perform a verification to determine that approved corrective actions have been completed. Verification shall be accomplished as soon as practicable. When feasible, verification may be accomplished by submittal of documents and records in lieu of a site visit. When a site visit is necessary for the verification, it may be deferred until the next site visit or be included in the scope of the next scheduled assessment.

- B. Document the verification in CAR block 18 or on a CAR continuation sheet and identify the specific areas investigated, the objective evidence reviewed, and the results of the verification. Indicate acceptable verification by signing and dating the CAR in block 19a. If the verification is not acceptable, the verifier shall document, on a CAR continuation sheet, the corrective actions that were unacceptable, incomplete, or why corrective action could not be verified, and what further actions are required.
- C. Assign a cause code in block 19b per TP 3.2.

5.6.2 If the corrective action verifier does not accept the corrective actions, a transmittal requesting additional actions shall be issued by the assessment team leader to the responsible organization with a new expected completion date identified with a copy to the CAR coordinator.

5.7 CAR Closure

- 5.7.1 The assessment team leader shall review verification information and, if closure is justified, obtain the Quality Assurance Manager's signature in CAR block 20 and provide a copy to the CAR coordinator.
- 5.7.2 The CAR coordinator shall update the CBFO CAR log to reflect the CAR status.
- 5.7.3 The assessment team leader shall issue a transmittal to the responsible organization informing them of the CAR closure and ensure that CAR records are prepared and submitted in accordance with section 6.0, Records.
- 5.7.4 The CAR coordinator shall perform a semi-annual review of CARs to identify potentially adverse trends over the previous six months, in accordance with TP 3.2.

5.8 Site-Generated CARs

- 5.8.1 RCRA-related corrective action reports, generated by the TRU waste sites during their internal assessments, are also transmitted to the CBFO CAR coordinator for inclusion in the CBFO CAR tracking database.
- 5.8.2 Upon receipt of a site-generated CAR, the CAR coordinator shall assign a CBFO CAR number in the CAR identification block.
- 5.8.3 Site-generated CARs shall be uniquely identified by their site identification letters (LANL=LA, RFETS=RF, ORNL=OR, etc.) within the CAR number, i.e., 99-LA-00.
- 5.8.4 The CBFO CAR log database entries will be restricted to (reference paragraph 5.2.4) items A, C, D, F, J, L, M, N.
- 5.8.5 Upon closure of the site-generated CARs, the site shall transmit a copy of the closed CAR to the CBFO CAR coordinator.
- 5.8.6 The CBFO CAR coordinator will update the CBFO CAR log.
- 5.8.7 The CBFO CAR coordinator shall transmit site-generated CARs and CAR closure documentation to the WIPP operating record after the information is entered in the tracking database.

5.9 Evaluation of Impact for CARs Related to Certified Processes at TRU Waste Sites.

- 5.9.1 The NTP Assistant Manager or designee shall evaluate the impact of CARs requiring accelerated corrective action.
- 5.9.2 The evaluation shall address waste received by WIPP and waste awaiting shipment.
- 5.9.3 The evaluation shall be documented on a CAR continuation sheet and transmitted to the CBFO CAR coordinator for inclusion in the CAR files. The evaluation shall also be transmitted to the CBFO Manager and the responsible organization, as appropriate.
- 5.9.4 The evaluation will include a determination of whether waste shipments from the TRU waste site should be suspended.
- 5.9.5 Results of the evaluation shall be forwarded to NMED and/or EPA, as appropriate.
- 5.9.6 This evaluation should be completed within 10 working days of NTP receiving the CAR.

6.0 RECORDS

- 6.1 CAR documents shall be processed and maintained as QA records in accordance with MP 4.5 and MP 4.9.
- 6.2 The following records are considered to be QA records:
 - 6.2.1 The CAR form and continuation sheets
 - 6.2.2 Supporting documentation (e.g., transmittal letters, CAR responses, response evaluations, extension requests and approvals, verification documentation, and closure memos, NTP evaluations of CAR impact related to CBFO-certified processes at the TRU waste sites).

7.0 ATTACHMENTS

- 7.1 Attachment I: Example of a CBFO corrective action report and a CAR continuation sheet.
- 7.2 Attachment II: Instructions for providing corrective action response.
- 7.3 Attachment III: Example of a CBFO Corrective Action Report Log.
- 7.4 Attachment IV: The Corrective Action Report Process.
- 7.5 Attachment V: Instructions for Completing the CAR

EXAMPLE OF A CORRECTIVE ACTION REPORT

1. CAR No.:		2. Activity Report No.:		3. Page ____ of ____	
4. Controlling Document:			5. CBFO Assessment Team Leader:		
6. Responsible Organization:			7. CAQ was Discussed With:		
8. Requirement that was violated:					
9. Condition Adverse to Quality:					
10. Suggested Actions (Optional):					
11a. Significant CAQ		(Yes or No):			
11b. Work Suspension Recommended		(Yes or No):			
11c. RCRA Related		(Yes or No):			
11d. Accelerated Corrective action Required?		(Yes or No):			
12. Types of Actions: Remedial: ____ Investigative: ____ Root Cause: ____ Actions to Preclude Recurrence: ____					
13. CAR Initiator: _____ Date: _____					
14. Response Due Date _____ Corrective Action Response Required YES <input type="checkbox"/> NO <input type="checkbox"/>					
Required Corrective Action Completion Date: _____					
15. a. Concurrence: _____		b. _____		_____	
Assessment Team Leader		Date		Responsible Assistant Manager	
c. _____		_____		_____	
Quality Assurance Manager		Date			
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet					
17. Acceptance of Proposed Corrective Actions:					
_____		_____		_____	
Assessment Team Leader		Date			
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)					
19a. Verified By: _____					
Name		Date			
19b. Trend Cause Code: _____					
20. Closure: _____					
Quality Assurance Manager		Date			

EXAMPLE OF A CAR CONTINUATION SHEET

CAR Continuation Sheet		
1. CAR No.	2. Activity Report No.	3. Page ___ of ___

INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION RESPONSE

WASTE ISOLATION PILOT PLANT
U.S. DEPARTMENT OF ENERGY
Carlsbad Field Office

CAR NO: _____
PAGE _____ OF _____

**INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION PLAN IN
RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY**

You are requested to provide a corrective action in response to this corrective action report (CAR) by the due date identified in block 14 of the CAR. If this date cannot be met, provide a written request for extension to the assessment team leader (block 5). This request must include justification for the delay and must be provided prior to the due date.

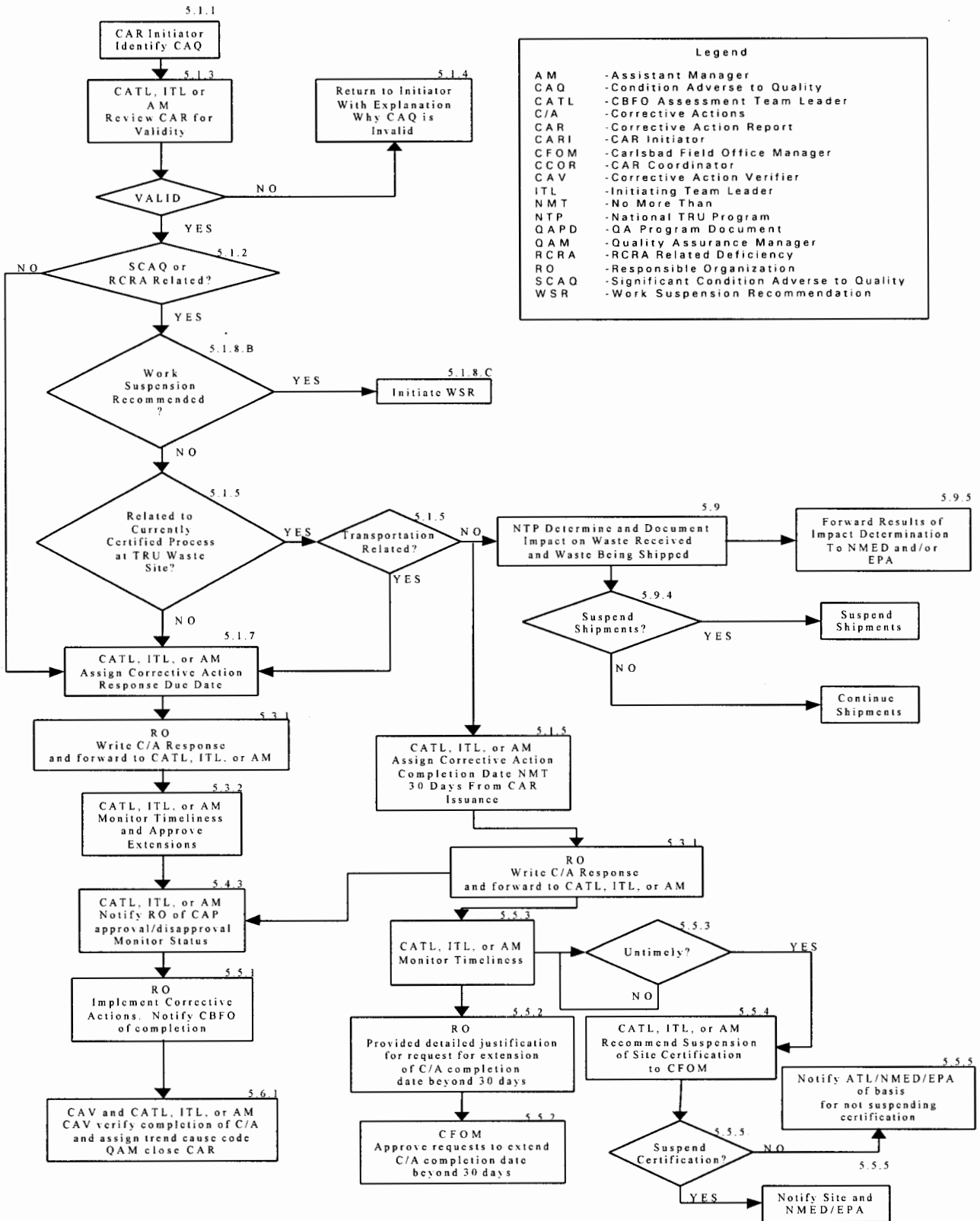
The response shall address the corrective actions indicated in block 12. As appropriate, develop the response in accordance with the following sequence and format:

In order to develop the CAR response, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The response shall include the following information, as appropriate to block 12.

1. Corrective action response for CAR # _____
 - A. **Remedial Action**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
 - B. **Extent and Impact of the Deficiency**-Describe the investigative actions performed to determine the extent and impact of the condition and the results. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
 - C. **Root Cause Determination**-Identify the root cause of the condition as determined through investigative action.
 - D. **Corrective Action to Preclude Recurrence**-Identify the actions required to address the root cause of the condition in order to preclude recurrence.
2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

ATTACHMENT IV
Page 1 of 1

CORRECTIVE ACTION REPORT PROCESS



ATTACHMENT V

INSTRUCTIONS FOR COMPLETING THE CAR

<i>Block No.</i>	<i>Performed By</i>	<i>Action</i>
1	CARI	Enter the sequential CAR identification number obtained from the CCOR.
2	CARI	Identify any activity report number associated with the identified deficiency (e.g., Surveillance #, Audit #, Overview #, etc. otherwise mark block N/A.
3	CARI	Enter page numbers.
4	CARI	Identify the applicable requirements document and revision.
5	CARI	Enter the Assessment Team Leader responsible for coordinating and obtaining the corrective action response.
6	CARI	Enter the organization responsible for implementing corrective action.
7	CARI	Indicate the person in the Responsible Organization who was made aware of the condition.
8	CARI	Identify the specific requirements associated with the condition adverse to quality.
9	CARI	Briefly and clearly describe the condition adverse to quality, including representative examples.
10	CARI	Briefly describe any suggestions for actions to correct the adverse condition.
11a	CARI	Recommend if this is a significant condition adverse to quality.
11b	ATL	Indicate if a work suspension is recommended.
11c	ATL	Determine if the deficiency is a violation of WIPP Hazardous Waste Facility Permit requirements.
11d	ATL	Determine if the deficiency meets the criteria for accelerated corrective action required, i.e., a deficiency in a CBFO certified process at a TRU Waste Site that is a SCAQ or RCRA related, not a transportation requirement.
12	CARI	Identify the applicable corrective actions activities. Remedial action is the minimum required for any CAR. Investigative, Root Cause, and Actions to Preclude Recurrence are required for any CAR addressing an SCAQ or a RCRA related deficiency.
13	CARI	Name and Date.
14	ATL	Enter the Response Due Date. Enter a corrective action completion date no more than 30 days from CAR issuance for CARs requiring accelerated corrective action. Otherwise, mark corrective action completion date "NA". Determine if a corrective action plan is required.
15a	ATL	Sign and date indicating concurrence with CAR validity and Blocks 2 through 14.
15b	RAM	Sign to concur with the method of work suspension. If work suspension is not recommended, mark "NA".
15c	QAM	Sign if the deficiency is a SCAQ, otherwise mark "NA".
16	RO	Responsible Organization provides proposed Corrective Actions (on a CAR Continuation Sheet).
17	ATL	Sign and date indicating acceptance of proposed corrective action.
18	CARI	Enter activities performed to verify corrective action completion and effectiveness.
19	CARI	Sign and date indicating completion of verification activities; document on a CAR Continuation Sheet and assign trend cause code.
20	QAM	Sign and date, indicating CAR closure.

- ATL = Assurance Team Leader
- CARI = Corrective Action Report Initiator
- RO = Responsible Organization
- RTL = Responsible Team Leader
- QAM = QA Manager
- RAM = Responsible Assistant Manager