DATE: May 27, 2004

REPLY TO ATTN OF: CBFO:QA:MLC:GS:04-1521:UFC 2300.00

SUBJECT: Issuance of CAR 04-027 Initiated During Audit A-04-16

TO: Freida B. Huckeba, CBFO, Office of Business, Acting Manager

The Carlsbad Field Office (CBFO) performed Audit A-04-16 of the CBFO Quality Assurance Program Document on May 10-13 and 19, 2004. During the course of the audit it was noted that MP 2.1, Personnel Qualification and Training, is currently not being fully implemented for CBFO new employees. CAR 04-027 was generated to document this condition and the need for a revision to address current practices. The CAR is classified as a significant condition adverse to quality and is attached for your information.

If you have any questions or comments, please contact me at (505) 234-7423.

M. Lea Chism
Quality Assurance Specialist

Attachment

cc: w/attachment
L. Piper, CBFO  *ED
A. Holland, CBFO  *ED
C. F. Wu, CBFO  *ED
M. Eagle, EPA  *ED
J. Bearzi, NMED  *ED
J. Kieling, NMED  *ED
D. Winters, DNFSB  *ED
S. Zappe, NMED  *ED
P. Rodriguez, CTAC  *ED
J. Gray, CTAC  *ED
A. Pangle, CTAC  *ED
CBFO QA File
CBFO M&RC
CORRECTIVE ACTION REPORT

1. CAR No.: 04-027
2. Activity Report No.: A-04-16
3. Page 1 of 2

4. Controlling Document: MP 2.1, Personnel Qualification And Training, Revision 1, CBFO QAPD, Revision 5
5. CBFO Assessment Team Leader:
   Lea Chism

6. Responsible Organization: CBFO Quality Assurance
7. CAQ Was Discussed With: Ava Holland

8. Requirement that was violated: [A] CBFO QAPD, Revision 5, Section 1.2.2 B, states in part: “Ensure that personnel receive indoctrination in the following: 1. General criteria, including applicable QA Plans, codes, regulations, and standards.” [B] CBFO MP 2.1, Personnel Qualification And Training, Revision 1, Section 4.2: “The Assurance Team Leader is responsible for providing the initial QA program orientation, QA and MP training of all personnel, and follow-on training based on changes to the CAO QAPD and/or the CAO MPs.”

9. Condition Adverse to Quality: CBFO does not maintain a training program for CBFO personnel which implements the following program elements:
   1. Initial orientation for new personnel or refresher training for all other personnel on the quality and nuclear safety requirements applicable to their functions within the CBFO.
      a. There are 15 CBFO employees that did not receive initial orientation.
      b. Refresher training for all other employees has not been performed.

   [see continuation sheet]

10. Suggested Actions (Optional):

11a. Significant CAQ (Yes or No): Yes
11b. Work Suspension Recommended (Yes or No): No
11c. RCRA-Related (Yes or No): No
11d. Accelerated Corrective Action Required (Yes or No): No


13. CAR Initiator: [Signature]  Date: 05/19/04

14. Response Due Date: June 18, 2004  Corrective Action Plan Required: YES
   Required Corrective Action Completion Date: N/A

15. a. Concurrence: [Signature]  Date: 5/29/04
   b. Concurrence: [Signature]  Date: 5/29/04

16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet

17. Acceptance of Proposed Corrective Actions:

18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)

19a. Verified By: [Signature]  Name: [Name]  Date: [Date]

19b. Trend Cause Code: [Code]

20. Closure: [Signature]  Quality Assurance Manager  Date: [Date]
Block #9 (cont’d): Condition Adverse to Quality:

2. Delegation of an individual responsible for the management and implementation of quality and nuclear safety training. One individual is designated as the Training Coordinator, but does not have the authority to establish training needs or to direct training performance.

3. Maintenance of quality and nuclear safety training program procedure(s) and records to include recent changes to program requirements and documents.
   a. MP 2.1, Revision 1 is outdated and in need of a complete revision. None of the three attachments addressed in the process steps (Attachment I, CAO Qualification Card; Attachment II, IDP Performance Development Sheet; and Attachment III, CAO Attendance Sheet) are being utilized.
   b. There is no objective evidence of the IDP program being implemented by the CBFO.
   c. Individual CBFO qualification/training notebooks (“Orange Books”) are no longer used or maintained.
   d. The on-line “POWER” system based out of Savanna River is used to schedule and approve training, but its use in relation to quality and nuclear safety training is not addressed in CBFO procedures.
   e. The only existing controlled qualification cards are those which implement DOE O 360.1, Federal Employee Training Requirements, and these are prepared for only a select group of CBFO technical personnel.