



Department of Energy  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221

JUL 8 2010



Mr. Jon E. Hoff, Manager  
 Quality Assurance  
 Washington TRU Solutions, LLC  
 P.O. Box 2078  
 Carlsbad, NM 88221 - 2078

Subject: Evaluation of the CAP for CAR 10-035, Audit A-10-20, WTS Monitoring Programs

Dear Mr. Hoff:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) written in response to CBFO Corrective Action Report (CAR) 10-035, which was identified during Audit A-10-20, WTS Monitoring Programs. The results of the evaluation are documented on the enclosed CAR Continuation Sheet, which indicates rejection of the submitted CAP. Please review the attached CAR Continuation Sheet and submit a revised CAP for CAR 10-035 by July 22, 2010.

If you have any questions or comments, please contact me at (575) 234-7442.

Sincerely,

*Lea Chism*  
 FOR

M. Lea Chism  
 Quality Assurance Specialist

Enclosure

cc: w/enclosure

A. Holland, CBFO	*ED	R. Lee, EPA	ED
H. Budweg, CBFO	ED	S. Zappe, NMED	ED
G. Basabilvazo, CBFO	ED	S. Holmes, NMED	ED
D. Miehl, CBFO	ED	T. Kesterson, DOE OB WIPP NMED	ED
M. Navarrete, CBFO	ED	D. Winters, DNFSB	ED
S. McCauslin, CBFO	ED	A. Pangle, CTAC	ED
D. Ferguson, CBFO	ED	G. White, CTAC	ED
F. Sharif, WTS	ED	P. Y. Martinez, CTAC	ED
M. A. Mullins, WTS	ED	P. Gomez, CTAC	ED
M. Eagle, EPA	ED	WIPP Operating Record	ED
E. Feltcorn, EPA	ED	CBFO QA File	
R. Joglekar, EPA	ED	CBFO M&RC	
S. Ghose, EPA	ED	*ED denotes electronic distribution	



CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: 10-035	2. Activity No: A-10-20	3. Page <u>1</u> of <u>1</u>
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**Block # 16** Acceptance of Proposed Corrective Actions:

An evaluation was performed of the proposed actions detailed in the corrective action plan (CAP) developed in response to Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 10-035. The CAP was submitted via WTS letter QA:10:00169, dated June 14, 2010, from Mr. J. E. Hoff, Manager, Quality Assurance, to Ms. M. L. Chism, Quality Assurance Specialist, CBFO.

The results of the CAP evaluation indicate that the CAP does not adequately address corrective actions necessary for Investigative Actions, Root Cause, and Actions to Prevent Recurrence.

Investigative Actions

*"A review of the verbiage in the WP 02-EM3003 procedure, the Round 29 Semi-annual Groundwater Monitoring Report, and the V&V Checklist Attachments 4 – 13, indicated that the audit conclusions were warranted, except that the Data Validator could not locate any V&V checklists (Attachments) where a Y/N response (or appropriate N/A) was omitted....."*

It is unclear why reference is given to Attachment 4 – 13 when the Semi-annual Groundwater Monitoring Report subject to this CAR uses attachments 2 – 15. Accordingly, the investigative actions should correspond to Attachments 2 – 15. Examples include the lack of Y/N or N/A in the following instances: Attachment 14 under WQSP-2, Attachments 3 and 12 under WQSP-6A. The investigative actions should include an assessment to determine if further instances of the omission of entries have occurred.

Root Cause

A review of the Root Cause determination concluded that consideration has not been given to the lack of the required distribution, e.g.; distribution to the QA Manager and the Field Team Leader, as was noted in the CAR.

Actions to Prevent Recurrence

Based on the necessary additional investigative actions needed as detailed above, the CAP should include additional actions to prevent recurrence, as deemed appropriate. Furthermore, the Actions to Prevent Recurrence should be revised to be accurate and to be consistent with the Commitments noted in the CAP. For example, action #1 in Actions to Prevent Recurrence states, "Revise WP 02-EM3001 to (1) include a signature block for the EM&H Manager." This requirement already exists in the current procedure, therefore action #1 is not appropriate. The other corrective actions should be evaluated for appropriateness and correctness. The CAP states that an email was sent as evidence of completion of action #1, however, no email was provided to evidence completion of this commitment.

Based on this evaluation, it is recommended that the CAP for CAR 10-035 be rejected.

Evaluation performed by Priscilla Y. Martinez Date 7-1-10  
Priscilla Y. Martinez