

## Zappe, Steve, NMENV

---

**From:** Alexander, Michelle - DOE [michelle.alexander@wipp.ws]  
**Sent:** Thursday, November 04, 2010 9:17 AM  
**To:** Zappe, Steve, NMENV  
**Cc:** McCauslin, Susan - DOE; Chavez, Rick  
**Subject:** Car 10-039

**Attachments:** CAR 10-039.pdf

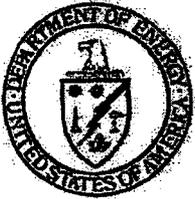


CAR 10-039.pdf (4  
MB)

Attached is the information you requested on CAR 10-039.

Thank you  
Michelle D. Alexander  
Office of Regulatory Compliance  
Office of Site Operations  
U.S. Department of Energy  
Carlsbad Field Office  
P.O. Box 3090  
4021 National Parks Highway  
Carlsbad, NM 88220  
(575) 234-7086





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

**JUL 21 2010**

Mr. Wayne Ledford  
Audit and Assessment Manager  
CBFO Technical Assistance Contractor  
4021 National Parks Hwy.  
Carlsbad, New Mexico 88220

Subject: Issuance of Corrective Action Report 10-039

Dear Mr. Ledford:

The Carlsbad Field Office (CBFO) has identified a condition adverse to quality (CAQ) related to the process of the issuance of Audit Reports. This CAQ is documented on the enclosed CBFO Corrective Action Report (CAR) for CAR number 10-039.

Please provide a documented response on the enclosed CAR Continuation Sheet ensuring that the required actions indicated in Block 12 of the CAR are addressed, including a schedule for completion. Your response must be returned on or before the due date identified in Block 14 of the CAR.

If you have any questions or comments, please contact me at (575) 234-7483.

Sincerely,

Martin Navarrete  
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure  
D. Moody, CBFO \*ED  
A. Holland, CBFO ED  
G. Basabilvazo, CBFO ED  
D. Miehl, CBFO ED  
L. Chism, CBFO ED  
R. Chavez, WRES ED  
P. Y. Martinez, CTAC ED  
A. Pangle, CTAC ED  
G. White, CTAC ED  
WIPP Operating Record ED  
CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution.

CBFO Form 3.1-1

### CORRECTIVE ACTION REPORT

1. CAR No.: 10-039	2. Activity Report No.: N/A	3. Page 1 of 1
4. Controlling document: CBFO MP 10.3, Rev. 6, Audits	5. CBFO Assessment Team Leader: M. Navarrete	
6. Responsible organization: CTAC QA	7. CAQ was discussed with: Wayne Ledford, Priscilla Y. Martinez	
8. Requirement that was violated: CBFO MP 10.3, Rev. 6, Section 5.5.2, states:  "The audit report shall be reviewed, approved, and issued by the CBFO QAM. Audit reports shall be issued within 30 days of the completion of the audit."		
9. Condition Adverse to Quality (CAQ):  Audit Report A-10-17 was not issued within the 30 days of completion of the audit.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNIN218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12. Type of actions required:  Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: AA05	13b. CAR Initiator: <u>Priscilla Y. Martinez</u> (printed name) Priscilla Y. Martinez	Date: 7/19/10
14a. Response due date: <u>8-12-10</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader: <u>M. Navarrete</u> (printed name) M. Navarrete		Date: <u>7-20-10</u>
b. CBFO Quality Assurance Director (If SCAQ, work suspension, or accelerated corrective action, sign here; otherwise, mark as N/A): <u>N/A</u> (printed name)		Date:
16. Acceptance of Proposed Corrective Actions: _____ (printed name)		Date:
17. Acceptance of Corrective Action Completion: _____ (printed name)		Date:
18. Closure: _____ (printed name)		Date:

**INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION PLAN**

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

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

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

In order to develop the corrective action plan, 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 plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # 10-039
  - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
  - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. 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 actions.
  - D. **Actions to Preclude Recurrence**-Identify the corrective 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.

**NOTE:** The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.

CBFO Form 3.1-2

**CAR CONTINUATION SHEET**

1. CAR No: <b>10-039</b>	2. Activity No: <b>N/A</b>	3. Page <u>2</u> of <u>2</u>

# CTAC

# COPY

**Carlsbad Field Office Technical Assistance Contractor**

4021 National Parks Highway

Carlsbad, NM 88220

(575) 234-7156

**JUL 22 2010**

Mr. Martin P. Navarrete  
Senior Quality Assurance Specialist  
Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221-3090

**Subject: CORRECTIVE ACTION PLAN FOR CORRECTIVE ACTION REPORT  
10-039**

**Reference: CBFO Memorandum CBFO:QA:MPN:MAG:10-1345:UFC:2300.00 from Mr.  
Martin Navarrete to Mr. Wayne Ledford, dated July 21, 2010, Subject: Issuance  
of Corrective Action Report 10-039**

Dear Mr. Navarrete:

Enclosed for your review and approval is the proposed corrective action plan (CAP) for the condition adverse to quality (CAQ) related to the process of the issuance of the Audit Reports identified in Corrective Action Report (CAR) 10-039. This CAP is documented on the enclosed CAR continuation sheet.

If you have any questions or comments, please contact me at extension 7182.

Sincerely,



Wayne Ledford  
Manager, Audit and Assessments  
Carlsbad Technical Assistance Contractor

Enclosure

UNIQUE #	DOE UFC	DATE REC'VD	ADDRESSEES
1001993	2300.00	JUL 22 2010	M. Navarrete w/orig. attach



Navarro Research and Engineering, Inc.

www.navarro-inc.com

WL:2010:02:297

cc w/enclosure:

D. Moody, CBFO	ED*
A. Holland, CBFO	ED
G. Basabilvazo, CBFO	ED
D. Miehl, CBFO	ED
L. Chism, CBFO	ED
R. Chavez, CBFO	ED
P. Y. Martinez, CBFO	ED
A. Pangle, CTAC	ED
G. White, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

\*ED denotes electronic distribution.

CBFO Form 3.1-2

**CAR CONTINUATION SHEET**

1. CAR No: 10-039

2. Activity No: N/A

3. Page 1 of 2

Remedial Actions:

Audit report A-10-17 was issued on July 16, 2010.

**Responsible Manager:** Wayne Ledford

**Anticipated Completion Date:** July 16, 2010

Investigative Actions:

A review of all WAP-related audit reports issued in fiscal years 2009 and 2010 was performed to determine the extent and impact of the condition adverse to quality. All WAP-related audit reports issued in FY 2009 and FY 2010 were completed within the required 30 day time period with the exception of A-10-17 and A-09-07.

AUDIT #	DATE	INTERIM AUDIT REPORT	FINAL AUDIT REPORT
A-10-17	June 8 – 10, 2010	N/A	July 16, 2010
A-10-16	June 8 – 10, 2010	June 28, 2010	CAR (no final yet)
A-10-14	April 27 – 29, 2010	May 28, 2010	In works
A-10-11	March 2 – 4, 2010	N/A	March 16, 2010
A-10-08	Feb. 9 – 11, 2010	March 11, 2010	June 25, 2010
A-10-07	April 6 – 8, 2010	May 5, 2010	In works
A-10-03	Oct. 6 – 7, 2010	N/A	November 4, 2009
A-10-01	Oct. 27 – 29, 2010	November 24, 2009	February 1, 2010
A-09-22	June 23 – 25, 2009	July 21, 2009	September 17, 2009
A-09-21	Aug. 4 – 6, 2009	August 31, 2009	September 25, 2009
A-09-19	Aug. 18 – 20, 2009	September 17, 2009	November 23, 2009
A-09-14	May 5 – 7, 2009	June 3, 2009	July 28, 2009
A-09-13	May 5 – 7, 2009	June 1, 2009	July 27, 2009
A-09-12	April 7 – 9, 2009	May 4, 2009	June 10, 2009
A-09-09	Aug. 16 – 20, 2009	September 17, 2009	November 23, 2009
A-09-08	Dec. 9 – 11, 2008	January 8, 2009	April 1, 2009
A-09-07	Jan. 13 – 15, 2009	February 18, 2009	March 6, 2009
A-09-05	Dec. 2 – 4, 2008	December 22, 2008	February 3, 2009
A-09-01	Oct. 28 – 30, 2008	November 25, 2008	January 26, 2009

\* A-09-07 was signed by the Lead Auditor on 2/13/09, but was not submitted to NMED until 2/18/09

CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: 10-039

2. Activity No: N/A

3. Page 2 of 2

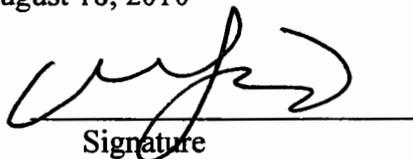
Actions to Preclude Recurrence:

- CTAC Audit and Assessment Manager will hold a briefing with all CTAC Lead Auditors regarding the condition adverse to quality identified in this CAR.
- CTAC will revise the Lead Auditor Course to emphasize the requirement that WAP-related audit reports must be submitted within 30 calendar days of the last day of the audit.

**Responsible Manager:** Wayne Ledford

**Anticipated Completion Date:** August 18, 2010

Wayne Ledford  
CTAC Audit and Assessment  
Manager

  
Signature

7-22-10  
Date



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

July 28, 2010

Mr. Wayne Ledford  
Audit and Assessment Manager  
CBFO Technical Assistance Contractor  
4021 National Parks Hwy.  
Carlsbad, New Mexico 88220

Subject: Approval of the CAP for CAR 10-039

Dear Mr. Ledford:

The Carlsbad Field Office (CBFO) performed an evaluation of the corrective action plan (CAP) developed to address and correct the condition adverse to quality identified in Corrective Action Report (CAR) 10-039.

Evaluations of the proposed corrective actions are documented on the attached CAR Continuation Sheet and indicate the CAP is acceptable. Based on this evaluation, this CAP is approved.

If you have any questions or comments, please contact me at (575) 234-7483.

Sincerely,

Martin Navarrete  
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure  
D. Moody, CBFO \*ED  
A. Holland, CBFO ED  
G. Basabilvazo, CBFO ED  
D. Miehl, CBFO ED  
L. Chism, CBFO ED  
R. Chavez, WRES ED  
P. Y. Martinez, CTAC ED  
A. Pangle, CTAC ED  
G. White, CTAC ED  
WIPP Operating Record ED  
CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution

CBFO Form 3.1-2

**CAR CONTINUATION SHEET**

1. CAR No: 10-039

2. Activity No: N/A

3. Page 1 of 2

**Remedial Actions:**

Audit report A-10-17 was issued on July 16, 2010.

**Responsible Manager:** Wayne Ledford

**Anticipated Completion Date:** July 16, 2010

**Investigative Actions:**

A review of all WAP-related audit reports issued in fiscal years 2009 and 2010 was performed to determine the extent and impact of the condition adverse to quality. All WAP-related audit reports issued in FY 2009 and FY 2010 were completed within the required 30 day time period with the exception of A-10-17 and A-09-07.

AUDIT #	DATE	INTERIM AUDIT REPORT	FINAL AUDIT REPORT
A-10-17	June 8 – 10, 2010	N/A	July 16, 2010
A-10-16	June 8 – 10, 2010	June 28, 2010	CAR (no final yet)
A-10-14	April 27 – 29, 2010	May 28, 2010	In works
A-10-11	March 2 – 4, 2010	N/A	March 16, 2010
A-10-08	Feb. 9 – 11, 2010	March 11, 2010	June 25, 2010
A-10-07	April 6 – 8, 2010	May 5, 2010	In works
A-10-03	Oct. 6 – 7, 2010	N/A	November 4, 2009
A-10-01	Oct. 27 – 29, 2010	November 24, 2009	February 1, 2010
A-09-22	June 23 – 25, 2009	July 21, 2009	September 17, 2009
A-09-21	Aug. 4 – 6, 2009	August 31, 2009	September 25, 2009
A-09-19	Aug. 18 – 20, 2009	September 17, 2009	November 23, 2009
A-09-14	May 5 – 7, 2009	June 3, 2009	July 28, 2009
A-09-13	May 5 – 7, 2009	June 1, 2009	July 27, 2009
A-09-12	April 7 – 9, 2009	May 4, 2009	June 10, 2009
A-09-09	Aug. 16 – 20, 2009	September 17, 2009	November 23, 2009
A-09-08	Dec. 9 – 11, 2008	January 8, 2009	April 1, 2009
A-09-07	Jan. 13 – 15, 2009	February 18, 2009	March 6, 2009
A-09-05	Dec. 2 – 4, 2008	December 22, 2008	February 3, 2009
A-09-01	Oct. 28 – 30, 2008	November 25, 2008	January 26, 2009

\* A-09-07 was signed by the Lead Auditor on 2/13/09, but was not submitted to NMED until 2/18/09

CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: 10-039

2. Activity No: N/A

3. Page 2 of 2.

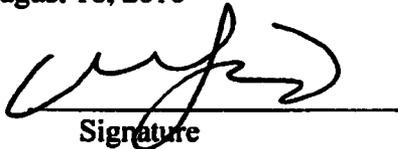
**Actions to Preclude Recurrence:**

- CTAC Audit and Assessment Manager will hold a briefing with all CTAC Lead Auditors regarding the condition adverse to quality identified in this CAR.
- CTAC will revise the Lead Auditor Course to emphasize the requirement that WAP-related audit reports must be submitted within 30 calendar days of the last day of the audit.

**Responsible Manager:** Wayne Ledford

**Anticipated Completion Date:** August 18, 2010

Wayne Ledford  
CTAC Audit and Assessment  
Manager

  
Signature

7-22-10  
Date



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

July 29, 2010

Mr. Wayne Ledford  
Audit and Assessment Manager  
CBFO Technical Assistance Contractor  
4021 National Parks Hwy.  
Carlsbad, New Mexico 88220

Subject: Approval of the CAP for CAR 10-039

Dear Mr. Ledford:

The evaluation of the Corrective Action Plan (CAP) in letter CBFO:QA:MPN:MAG:10-1358:UFC 2300.00 dated July 28, 2010 to address the condition adverse to quality identified in Corrective Action Report (CAR) 10-039 was inadvertently transmitted with the incorrect enclosure. Please disregard the previous transmittal. For recordkeeping purposes, the enclosure included with this letter is the correct enclosure.

If you have any questions or comments, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete  
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure  
D. Moody, CBFO \* ED  
A. Holland, CBFO ED  
G. Basabilvazo, CBFO ED  
D. Miehl, CBFO ED  
L. Chism, CBFO ED  
R. Chavez, WRES ED  
P. Y. Martinez, CTAC ED  
A. Pangle, CTAC ED  
G. White, CTAC ED  
WIPP Operating Record ED  
CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution

CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: 10-039

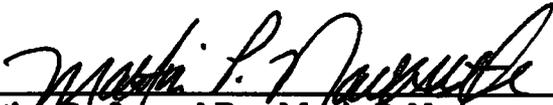
2. Activity No: N/A

3. Page 1 of 1

**Block # 16 Acceptance of Proposed Corrective Actions:**

An evaluation has been performed of the proposed corrective actions detailed in the corrective action plan (CAP) developed in response to CBFO Corrective Action Report (CAR) 10-039. The CAP was submitted via CTAC memorandum WL:2010:02:297, dated July 22, 2010, from Mr. Wayne Ledford, Manager, Audit and Assessments, to Mr. M. P. Navarrete, Senior Quality Assurance Specialist, Carlsbad Field Office.

The results of the evaluation indicate that the remedial actions, investigative actions, and actions to prevent recurrence should adequately address the CAR condition. Therefore, it is recommended that the CAP for CAR 10-039 be approved.

  
Evaluation Performed By: Martin P. Navarrete

7-29-10  
Date:



**Carlsbad Field Office Technical Assistance Contractor**  
 4021 National Parks Highway  
 Carlsbad, NM 88220  
 (575) 234-7186

**JUL 29 2010**

Mr. Martin P. Navarrete  
 Senior Quality Assurance Specialist  
 Carlsbad Field Office  
 P.O. Box 3090  
 Carlsbad, NM 88221-3090

Subject: TRANSMITTAL OF DOCUMENTATION SUPPORTING COMPLETION  
 OF CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE  
 ACTION REPORT 10-039

Dear Mr. Navarrete:

Enclosed for your review and approval is documentation supporting completion of CBFO  
 Technical Assistance Contractor corrective actions associated with CBFO Corrective Action  
 Report (CAR) 10-039.

If you have any questions or concerns, please contact me at (575) 234-7182.

Sincerely,

Wayne Ledford  
 Manager, Audit and Assessments  
 Carlsbad Technical Assistance Contractor

Enclosure

- cc w/enclosure:
- D. Moody, CBFO
- A. Holland, CBFO
- G. Basabilvazo, CBFO
- D. Miehl, CBFO
- L. Chism, CBFO
- R. Chavez, CBFO
- P. Y. Martinez, CBFO
- A. Pangle, CTAC
- G. White, CTAC
- WIPP Operating Record
- CBFO QA File
- CBFO M&RC

- ED\*
- ED

UNIQUE ID	INDEX	DATE RECEIVED	APPROVED
1002163	230000	JUL 29 2010	MP Navarrete
			D. Moody L. Chism
			A. Holland
			G. Basabilvazo
			D. Miehl D. Grill

\*ED denotes electronic distribution Navarro Research and Engineering, Inc.



- Item #1: Briefing for Carlsbad Field Office Corrective Action Report 10-039 with copy of CAR 10-039
- Item # 2: Attendance Sheet for Lead Auditor Briefing on CAR 10-039 and copies of completed Required Reading Forms for Briefing for CAR 10-039 for those personnel that could not attend the briefing in-person
- Item #3: Revised Lead Auditor Course Module 9, WAP Requirements reflecting enhancement regarding 30 day requirement

**Item #1: Briefing for Carlsbad Field  
Office Corrective Action Report  
10-039 with copy of CAR  
10-039**

## Briefing for Carlsbad Field Office Corrective Action Report 10-039

- CBFO issued CAR 10-039 to CTAC on July 21, 2010 (attached)
- The CAQ was not getting the audit report for the INL/CCP labs audit (A-10-17) issued within 30 days as required by MP 10.3
- The 30 day requirement is also a Permit Requirement (B6-4)
- These are calendar days, not working days
- The 30 day countdown begins on the last day of the audit and ends with the distribution of the audit report to the generator/storage site, with a copy to NMED (electronic distribution)
- Probable cause was the belief that an "Interim and Final" audit report could be prepared and issued within the 30 day limit, rendering an "Interim" audit report unnecessary
- To preclude recurrence of this CAQ, we need to take the following actions:
  - **Don't count on getting an "Interim and Final" audit report issued prior to the 30 day deadline.** Given our extended review process to prevent or reduce NMED's editorial comments on our reports, the "Interim and Final" option is not viable.
  - **Get the "Interim" report down to CBFO within 7 days.** It should be in CBFO review by the second Monday after you return from the audit. You should have a "straw man" audit report prepared before you leave for the audit.
- Questions/Comments

July 26, 2010

Wayne Ledford, CTAC Audit and Assessment Task Manager



CBFO Form 3.1-1

**CORRECTIVE ACTION REPORT**

1. CAR No.: 10-039		2. Activity Report No.: N/A		3. Page 1 of 1	
4. Controlling document: CBFO MP 10.3, Rev. 6, Audits		5. CBFO Assessment Team Leader: M. Navarrete			
6. Responsible organization: CTAC QA		7. CAQ was discussed with: Wayne Ledford, Priscilla Y. Martinez			
8. Requirement that was violated: CBFO MP 10.3, Rev. 6, Section 5.5.2. states:  "The audit report shall be reviewed, approved, and issued by the CBFO QAM. Audit reports shall be issued within 30 days of the completion of the audit."					
9. Condition Adverse to Quality (CAQ):  Audit Report A-10-17 was not issued within the 30 days of completion of the audit.					
10. Suggested actions (Optional): N/A					
11a. Significant CAQ? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required:	
11b. Work Suspension recommended? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
11c. RCRA related?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
11d. Accelerated corrective action required? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
11e. Does this CAQ affect waste streams BNINW216 or BNIN218?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: AA05		13b. CAR Initiator: <u>Priscilla Y. Martinez</u> (printed name) Priscilla Y. Martinez		Date: 7/19/10	
14a. Response due date: <u>8-12-10</u>					
14b. Required corrective action completion date: <u>N/A</u>					
15. Concurrence:					
a. Assessment Team Leader:		<u>M. Navarrete</u> (printed name) M. Navarrete		Date: <u>7-20-10</u>	
b. CBFO Quality Assurance Director (if SCAQ, work suspension, or accelerated corrective action, sign here; otherwise, mark as N/A):		<u>N/A</u> (printed name)		Date:	
16. Acceptance of Proposed Corrective Actions: _____ Date: _____ (printed name)					
17. Acceptance of Corrective Action Completion: _____ Date: _____ (printed name)					
18. Closure: _____ Date: _____ (printed name)					

Item #2: Attendance Sheet for Lead Auditor Briefing on CAR 10-039 and copies of completed Required Reading Forms for Briefing for CAR 10-039



I N T E R

# CTAC MEMO

O F F I C E

**To:** Distribution  
**From:** Cindi Castillo, CTAC Training Administration  
**Subject:** Required Reading & Briefing for CAR 10-039  
**Date:** July 22, 2010

A mandatory briefing for all CTAC Lead Auditors will be held on Monday, July 26, 2010, in T-111 at 2:00 pm. For those who will be out-of-town or are unable to attend the meeting, please read the attached briefing and corrective action report (CAR) 10-039. Then, print your name below, sign and date it, and return to Cindi Castillo via fax or email.

Please complete this required reading by **July 28, 2010**.

My signature below signifies that I have completed the above required reading.

LEA Chism \_\_\_\_\_ 07-26-10  
Print Signature Date

From the desk of  
Cindi Castillo  
CTAC/Navarro  
4021 National Parks Hwy  
Carlsbad, NM 88220  
(575) 234-7257 Business  
(575) 234-7198 Fax

**I N T E R**

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# CTAC MEMO

**O F F I C E**

**To:** Distribution  
**From:** Cindi Castillo, CTAC Training Administration  
**Subject:** Required Reading & Briefing for CAR 10-039  
**Date:** July 22, 2010

A mandatory briefing for all CTAC Lead Auditors will be held on Monday, July 26, 2010, in T-111 at 2:00 pm. For those who will be out-of-town or are unable to attend the meeting, please read the attached briefing and corrective action report (CAR) 10-039. Then, print your name below, sign and date it, and return to Cindi Castillo via fax or email.

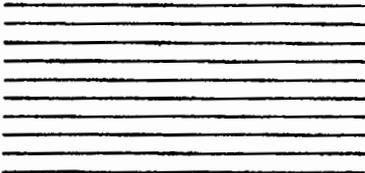
Please complete this required reading by **July 28, 2010**.

My signature below signifies that I have completed the above required reading.

Norman Frank  8/27/10  
Print Signature Date

From the desk of  
Cindi Castillo  
CTAC/Navarro  
4021 National Parks Hwy  
Carlsbad, NM 88220  
(575) 234-7257 Business  
(575) 234-7198 Fax

**I N T E R**



# CTAC MEMO

**O F F I C E**

**To:** Distribution

**From:** Cindi Castillo, CTAC Training Administration

**Subject:** Required Reading & Briefing for CAR 10-039

**Date:** July 22, 2010

A mandatory briefing for all CTAC Lead Auditors will be held on Monday, July 26, 2010, in T-111 at 2:00 pm. For those who will be out-of-town or are unable to attend the meeting, please read the attached briefing and corrective action report (CAR) 10-039. Then, print your name below, sign and date it, and return to Cindi Castillo via fax or email.

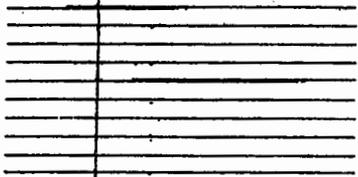
Please complete this required reading by **July 28, 2010**.

My signature below signifies that I have completed the above required reading.

HARLEY KIRSCHENMANN      Harley Kirschmann      7-27-2010  
 Print                                      Signature                                      Date

From the desk of  
 Cindi Castillo  
 CTAC/Navarro  
 4021 National Parks Hwy  
 Carlsbad, NM 88220  
 (575) 234-7257 Business  
 (575) 234-7198 Fax

I N T E R



# CTAC MEMO

O F F I C E

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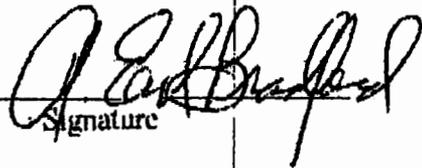
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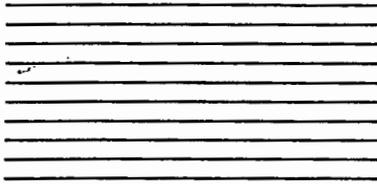
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A. EARL BRADFORD  July 28, 2010  
 Print Signature Date

From the desk of  
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 4021 National Parks Hwy  
 Carlsbad, NM 88720  
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William J. Verret

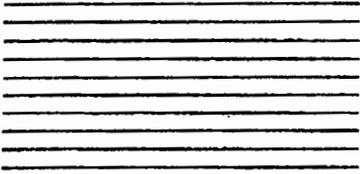
Print

William J. Verret  
Signature

7/22/10  
Date

From the desk of  
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# CTAC MEMO

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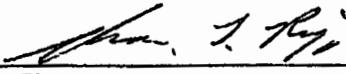
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Charles Riggs   
 Print Signature

7/22/10  
 Date

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I N T E R

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My signature below signifies that I have completed the above required reading.

DAVE KIMBRO  
Print

  
Signature

7/23/2010  
Date

From the desk of  
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I N T E R

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# CTAC MEMO

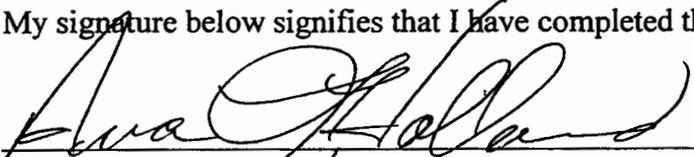
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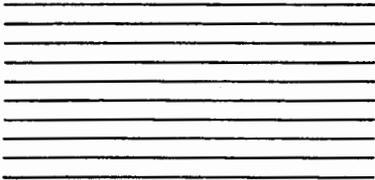
My signature below signifies that I have completed the above required reading.

  
\_\_\_\_\_  
Print *Ana L Hohmann* Signature

*7/23/10*  
\_\_\_\_\_  
Date

From the desk of  
Cindi Castillo  
CTAC/Navarro  
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Paul C. Gomez  
Print

  
Signature

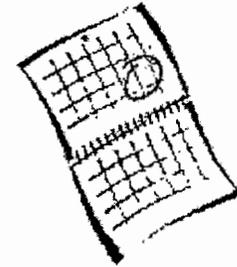
07/26/2010  
Date

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**Item #3: Revised Lead Auditor Course  
Module 9, WAP Requirements  
reflecting enhancement  
regarding 30 day requirement**



# WAP Requirements



- ❖ “Interim” audit report must be prepared, approved, and issued to the site within 30 days of completion of the audit
- ❖ **THIS IS A PERMIT REQUIREMENT... WE HAVE RECEIVED A CBFO CAR FOR MISSING THIS DEADLINE IN THE PAST!!!**
- ❖ Copy of issued “Interim” report to NMED
- ❖ Formal “Final” audit report to NMED will include WAP-related CAR resolution results and audit results [no NDA or Transportation information]



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

AUG 4 2010

Mr. Wayne Ledford  
Audit and Assessment Manager  
CBFO Technical Assistance Contractor  
4021 National Parks Hwy.  
Carlsbad, New Mexico 88220

Subject: Verification of Corrective Actions and Closure for CAR 10-039

Dear Mr. Ledford:

Enclosed are the results of the verification of completion of corrective actions for Corrective Action Report (CAR) 10-039. The evaluation concluded that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 10-039 is considered closed.

If you have any questions concerning the closure of this CAR, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete  
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure  
D. Moody, CBFO \*ED  
A. Holland, CBFO ED  
G. Basabilvazo, CBFO ED  
D. Miehl, CBFO ED  
L. Chism, CBFO ED  
R. Chavez, WRES ED  
P. Y. Martinez, CTAC ED  
A. Pangle, CTAC ED  
G. White, CTAC ED  
WIPP Operating Record ED  
CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution

CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: 10-039

2. Activity No: N/A

3. Page 1 of 2

**Block # 17 Acceptance of Corrective Action Completion:**

CBFO has evaluated the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 10-039. Verification of evidence included a review of completion documentation submitted to CBFO via CTAC memorandum WL:2010:02:305 dated July 29, 2010, from Wayne Ledford, Manager, Audit and Assessments, CBFO Technical Assistance Contractor, to M. P. Navarrete, CBFO, Senior Quality Assurance Specialist. The following details the methods used in verifying completion of each action as detailed in the corrective action plan (CAP) previously submitted and approved. Italicized text, from the CAP, is used to show the correlation between the corrective action and the method used for verification.

#### REMEDIAL ACTIONS

*CTAC has taken the following remedial action in response to the CAR condition:*

*Audit Report A-10-17 was issued on July 16, 2010.*

Verification:

The verifier reviewed the audit report for A-10-17 issued July 16, 2010 under CBFO memorandum CBFO:QA:ALH:MAG:10-1332:UFC:2300.00 dated July 16, 2010.

#### INVESTIGATIVE ACTIONS

*CTAC performed a review of all WAP-related audit reports issued in fiscal years 2009 and 2010 to determine the extent and impact of the condition adverse to quality. All WAP-related audit reports issued in FY 2009 and FY 2010 were completed within the required 30 day time period with the exception of A-10-17 and A-09-07.*

Verification

Review of Audit Reports issued in fiscal year 2009 and 2010 reflecting the date completed.

#### ACTIONS TO PRECLUDE RECURRENCE

*CTAC will take the following actions to prevent recurrence of the CAR condition:*

- 1. CTAC Audit and Assessment Manager will hold a briefing with all CTAC Lead Auditors regarding the condition adverse to quality identified in this CAR.*
- 2. CTAC will revise the Lead Auditor Course to emphasize the requirement that WAP-related audit reports must be submitted within 30 days of the last day of the audit.*

Verification:

1. The verifier reviewed the completed required reading forms and briefing attendance sheet for all CTAC Lead Auditors.
2. The verifier reviewed the enhancement implemented in the Lead Auditor Course documented on Mod 9, CBFO-QA-LP03-001, Rev. 3 07/2010.

CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: 10-039

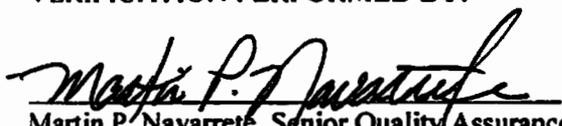
2. Activity No: N/A

3. Page 2 of 2

#### CONCLUSION

Based on the review of the completion documentation submitted, it has been determined that the corrective actions to prevent recurrence of the CAR condition have been satisfactorily implemented. Therefore, it is recommended that CAR 10-039 be considered closed.

#### VERIFICATION PERFORMED BY:

  
Martin P. Navarrete, Senior Quality Assurance Specialist  
Carlsbad Field Office

8-3-10  
Date

CBFO Form 3.1-1

**CORRECTIVE ACTION REPORT**

1. CAR No.: 10-039		2. Activity Report No.: N/A		3. Page 1 of 1	
4. Controlling document: CBFO MP 10.3, Rev. 6, Audits		5. CBFO Assessment Team Leader: M. Navarrete			
6. Responsible organization: CTAC QA		7. CAQ was discussed with: Wayne Ledford, Priscilla Y. Martinez			
8. Requirement that was violated: CBFO MP 10.3, Rev. 6, Section 5.5.2, states:  "The audit report shall be reviewed, approved, and issued by the CBFO QAM. Audit reports shall be issued within 30 days of the completion of the audit."					
9. Condition Adverse to Quality (CAQ):  Audit Report A-10-17 was not issued within the 30 days of completion of the audit.					
10. Suggested actions (Optional): N/A					
11a. Significant CAQ? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required:	
11b. Work Suspension recommended? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
11c. RCRA related?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
11d. Accelerated corrective action required? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
11e. Does this CAQ affect waste streams BNINW216 or BNIN218?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: AA05		13b. CAR Initiator: <u>Priscilla Y. Martinez</u> (printed name) Priscilla Y. Martinez		Date: 7/19/10	
14a. Response due date: <u>8-12-10</u>					
14b. Required corrective action completion date: <u>N/A</u>					
15. Concurrence:					
a. Assessment Team Leader: <u>Marta Navarrete</u> (printed name) M. Navarrete		Date: <u>7-20-10</u>			
b. CBFO Quality Assurance Director (if SCAQ, work suspension, or accelerated corrective action, sign here; otherwise, mark as N/A): <u>N/A</u> (printed name)		Date:			
16. Acceptance of Proposed Corrective Actions: <u>Marta Navarrete</u> (printed name) MARTA NAVARRETE		Date: <u>8-3-10</u> <u>8-3-10 7-29-10</u>			
17. Acceptance of Corrective Action Completion: <u>Marta Navarrete</u> (printed name) MARTA NAVARRETE		Date: <u>8-3-10</u>			
18. Closure: <u>Ava L. Hollander</u> (printed name) AVA L. HOLLANDER		Date: <u>8/4/10</u>			