Subject: Evaluation of the CAP for CBFO CAR 11-007, Audit A-11-01, SRS/CCP

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and evaluation of the Corrective Action Plan (CAP) developed in response to CBFO Corrective Action Report (CAR) 11-007, which resulted from CBFO Audit A-11-01 of the Savannah River Site Central Characterization Project (SRS/CCP) activities.

The results of the review and evaluation are documented on the enclosed CAR Continuation Sheet. The evaluation determined that the CAP for CAR 11-007 adequately addresses concerns identified in the CAR; therefore, the CAP is accepted.

If you have any questions or comments, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls
Acting Director of Quality Assurance

Enclosure

cc: w/enclosure
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*ED denotes electronic distribution
Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 11-007. The CAP was submitted via letter CP:10:01726, UFC 2300.00, dated November 18, 2010, from Mr. D. K. Ploetz, Manager, Central Characterization Project (CCP), Retrieval, Characterization and Transportation, to Mr. D. S. Miehls, CBFO Senior Quality Assurance Specialist.

Supplemental information for the CAP was submitted via email dated December 3, 2010, from Mr. AJ Fisher, WTS Training Department, to Mr. Dennis Miehls, CBFO Senior Quality Assurance Specialist.

The following corrective actions, shown in italics, were proposed by CCP to address the conditions adverse to quality identified in the CAR, followed by CBFO’s response to those proposed actions.

**Remedial Actions:**

a. “CCP performed a review of all qualification packages processed through Training over the past six months, to determine whether problems identified during the audit are representative of current quality performance."

“CCP will review all active qualification cards for those positions that do not require requalification, to verify that they are complete (i.e., that they do not have issues similar to those identified in the subject CAR)."

A review of all qualification packages processed through Training over the past six months, as well as, an additional review of those qualification cards that do not require requalification is an acceptable remedial action.

**Investigative Actions:**

a. “Because a training and qualification file contains documentation covering the entire time that an individual has been working for CCP, some of the individual records within the files can go back many years. This was the case for virtually all of the incomplete training records identified during the recertification audit. Only one of the incomplete qualification packages was from 2010; the rest were from the period of 2003 through 2008.

The CCP review of one hundred and twenty (120) qualification packages processed through Training over the past six months, discussed in the Remedial Action section of this Corrective Action Plan, shows that the conditions reported in the CAR are not representative of the quality of training documentation being produced today. The few recent issues that were identified in the 120 qualification packages were entirely administrative in nature, with no technical impact on the qualification status of any of the individuals whose packages were reviewed."
Due to the supporting documentation submitted and based on its additional remedial action ["CCP will review all active qualification cards for those positions that do not require re-qualification, to verify that they are complete (i.e., that they do not have issues similar to those identified in the subject CAR"], the investigative actions are acceptable.

**Actions to Preclude Recurrence:**

a. "CCP has briefed Training personnel on the conditions identified in the CAR, and emphasized the importance of ensuring that qualification packages are administratively complete and correct when they are turned over to Training."

This is an acceptable action to preclude recurrence.

Evaluation indicates that all corrective actions are adequate. It is recommended that the corrective action plan be accepted.

Planned Corrective Actions Evaluated By: Cindi Castillo  
Date: 10/6/10