



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

 ENTERED

April 18, 2011



Mr. D. K. Ploetz, Manager  
 Central Characterization Project  
 Retrieval, Characterization and Transportation  
 Washington TRU Solutions, LLC  
 P.O. Box 2078  
 Carlsbad, NM 88221-2078

Subject: Evaluation of the CAP for CAR 11-020 from Audit A-11-06, Central Characterization Project Quality Assurance Program Activities

Dear Mr. Ploetz:

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) 11-020, which was identified during Audit A-11-06, Central Characterization Project Quality Assurance Activities. The results of the evaluation are documented on the enclosed CAR Continuation Sheet, which indicates rejection of the submitted CAP. Please review the enclosed CAR Continuation Sheet and submit a revised CAP for CAR 11-020 by May 2, 2011.

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

Sincerely,



Dennis S. Miehls  
 Acting Director, Office of Quality Assurance

Enclosure

cc: w/enclosure

M. Navarrete, CBFO	*ED	R. Lee, EPA	ED
J. R. Stroble, CBFO	ED	S. Zappe, NMED	ED
N. Castaneda, CBFO	ED	S. Holmes, NMED	ED
D. Haar, WTS/CCP	ED	T. Kesterson, DOE OB WIPP NMED	ED
V. Cannon, WTS/CCP	ED	D. Winters, DNFSB	ED
A. J. Fisher, WTS/CCP	ED	P. Gilbert, LANL-CO	ED
M. Walker, WTS/CCP	ED	G. Lyshik, LANL-CO	ED
Y. Salmon, WTS/CCP	ED	P. Hinojos, CTAC	ED
J. Hoff, WTS	ED	G. White, CTAC	ED
M. Mullins, WTS	ED	K. D. Martin, CTAC	ED
T. Peake, EPA	ED	P. Y. Martinez, 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: 11-020

2. Activity No: A-11-06

3. Page 1 of 2.

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) 11-020. The CAP was submitted via WTS letter CP:11:01183, dated March 29, 2011, from Mr. D. K. Ploetz, Manager, Retrieval, Characterization and Transportation, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, CBFO.

Italicized text, taken verbatim from the CAP, is used to show the correlation between the proposed corrective action and the results of CBFO's evaluation.

#### REMEDIAL ACTIONS

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

*a) CCP has labeled the file cabinets in the Document Services area as "in-process" records.*

The remedial action provided in this CAP is insufficient and does not reflect the requirements of quality records in accordance with procedure CCP-QP-008, *CCP Records Management*. CCP-QP-008, Section 4.8, Note states, "Records become QA records when they are completed and validated. Validation may be by the author, assigned reviewer, OR individual specifically assigned to review and validate documents." The CCP CH RIDS Item 18 states, "CCP Procedures, Plans, and Reports are a QA Record/Nonpermanent/ Validated by authorized signature and date."

#### INVESTIGATIVE ACTIONS:

Extent *CCP QA randomly evaluated multiple record packages submitted to the Records Archive and did not find any of the issues identified in CAR 11-020.*

Impact *CCP has not identified any impacts based on the conditions identified in CAR 11-020.*

The investigation of this deficiency was insufficient. The records that were presented as Controlled Document (Current/Historical) being maintained as QA Records are not the ones that were randomly evaluated.

#### ROOT CAUSE DETERMINATION:

*The root cause of this issue was a misunderstanding concerning in-process records (the records maintained in Document Services area) and the completed records package, which is submitted to the Records Archive. During the audit, the auditor reviewed the in-process records maintained by Document Services and not the completed record packages maintained at the Records Archive. Before submittal to the Records Archive, in-process records are verified as being completed in accordance with CCP-QP-008, which will correct the potential issues identified by the auditor.*

CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: 11-020

2. Activity No: A-11-06

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During the course of the audit, the auditor requested a random selection of completed, effective procedures. The packages provided by the CCP Document Services Manager were reviewed and were found to be out of compliance with procedure CCP-QP-008, *CCP Records Management*, as noted in CAR 11-020.

#### ACTIONS TO PREVENT RECURRENCE:

- *Label the file cabinets in Document Services as "In-Process Records".*
- *Provide a briefing to the Document Services personnel regarding record status and review prior to turnover to the record archive.*

The actions to prevent recurrence addressed in this CAP are insufficient and do not reflect the requirements of quality records in accordance with procedure CCP-QP-008, *CCP Records Management*. CCP-QP-008, Section 4.8, Note, states "Records become QA records when they are completed and validated. Validation may be by the author, assigned reviewer, OR individual specifically assigned to review and validate documents." The CCP CH RIDS Item 18 states, "CCP Procedures, Plans, and Reports are a QA Record/Nonpermanent/ Validated by authorized signature and date." DOE-CBFO-94-1012, *CBFO Quality Assurance Program Document*, defines a Quality Assurance Record as "A completed record or any authenticated portion of a record that provides objective evidence of the quality of items or activities." Therefore, labeling the file cabinets in Document Services as "In-process Records" does not prevent the conditions from recurring.

Based on the results of this evaluation, it is recommended that the CAP for CAR 11-020 be rejected.

Evaluation performed by Katelyn Martin Date 4-13-2011  
Katelyn Martin