



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



MAY 12 2011

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

Subject: Evaluation of the Revised 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 indicate that the CAP for CAR 11-020 is conditionally accepted, as documented in the CAR evaluation.

Upon completion of all corrective actions, please provide notification and documentation supporting closure so that verification activities may be performed.

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

Sincerely,

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure



MAY 12 2011

Mr. D. K. Ploetz

-2-

cc: w/enclosure

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

2. Activity No: A-11-06

3. Page 1 of 2

An evaluation was performed of the proposed actions detailed in the Revised Corrective Action Plan (CAP) developed in response to Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 11-020. The Revised CAP was submitted via WTS letter CP:11:01299, dated May 2, 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 Revised 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) As described in the Action to Prevent Recurrence section of this Corrective Action Plan, CCP will begin distinguishing between those records packages that are "in-process" and those which have been "validated." This action is authorized by CCP-QP-008, and will be covered in the briefing provided to Document Services personnel.

b) CCP will "validate" the records packages currently in the CCP Document Services and identify validated records using the method defined in a), above. This will ensure that any similar conditions in these other records packages are identified and corrected. Because of the number of document packages that have to be validated, this action will not be complete until July 29, 2011.

Evaluation:

The remedial action provided in the Revised CAP is sufficient and is acceptable.

INVESTIGATIVE ACTIONS

Extent CCP QA randomly evaluated multiple record packages maintained at the records archive and did not find any of the issues identified in CAR 11-020.

Impact CCP has not identified any significant impacts to the packages being maintained at the records archive, based on the conditions identified in CAR 11-020.

Evaluation:

Conditionally accepted: The records that were presented as Controlled Documents (Current/Historical) being maintained as QA Records are not the ones that were randomly evaluated. This investigative action is accepted under the condition that further investigation will be completed on the appropriate records packages, and that evidence of the packages reviewed will be provided prior to CAR closure.

ROOT CAUSE DETERMINATION

The root cause of this issue was the massive volume of document changes that had to occur in a

CBFO Form 3.1-2

CAR CONTINUATION SHEET

| | | |
|-------------------|-------------------------|------------------------------|
| 1. CAR No: 11-020 | 2. Activity No: A-11-06 | 3. Page <u>2</u> of <u>2</u> |
|-------------------|-------------------------|------------------------------|

very limited time span with no additional resources. Over 100 documents were required to be changed based on the permit renewal changes, in addition to the normal work load of documents being processed through Document Services.

Evaluation:

Increased work load and time constraints are factors or precursors for error, and as such may be considered a "cause", however they are not considered justification for non-compliance. The purpose of a root cause determination is to identify causal factors that when corrected will prevent recurrence of the condition. Periods of increased work load are likely to reoccur. Based on the review and acceptance of the stated remedial actions and actions to prevent recurrence, this root cause is acceptable.

ACTIONS TO PREVENT RECURRENCE

a) CCP will begin placing a "validation" statement in each records package that has been "validated," so that "validated" record packages are clearly distinguishable from "in-process" records packages. Records packages will not be transmitted to or maintained at the records archive until they have been validated.

b) Provide a briefing to Document Services personnel regarding record status and review prior to "validating" the records, as authorized by CCP-QP-008.

Evaluation:

The actions to prevent recurrence addressed in this Revised CAP are sufficient and acceptable.

Based on the results of this evaluation, it is recommended that the Investigative Actions and Root Cause Determination in the Revised CAP for CAR 11-020 be rejected.

Evaluation performed by  Date 5/12/11
Priscilla Y. Martinez