



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
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JUN 20 2011

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

Subject: Evaluation of the CAP for CAR 11-038 from Audit A-11-11

Dear Mr. Ploetz:

The Carlsbad Field Office (CBFO) performed Audit A-11-11 of the Los Alamos National Laboratory Central Characterization Project on May 17-19, 2011. Corrective Action Report (CAR) 11-038 was issued as a result of that audit.

Enclosed are the results of the CBFO review of the Washington TRU Solutions proposed Corrective Action Plan (CAP) for CAR 11-038. Evaluation of the proposed corrective actions is documented on the enclosed CAR Continuation Sheet, indicating that the CAP for CAR 11-038 is acceptable.

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

If you have any questions or concerns regarding this evaluation, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

R. Unger, CBFO	*ED	R. Joglekar, EPA	ED
J. R. Stroble, CBFO	ED	S. Ghose, EPA	ED
N. Castaneda, CBFO	ED	R. Lee, EPA	ED
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M. Walker, WTS/CCP	ED	P. Hinojos, CTAC	ED
Y. Salmon, WTS/CCP	ED	G. White, CTAC	ED
J. Hoff, WTS	ED	C. Castillo, CTAC	ED
M. A. Mullins, WTS	ED	WIPP Operating Record	ED
T. Peake, EPA	ED	CBFO QA File	
M. Eagle, EPA	ED	CBFO M&RC	
E. Felcorn, EPA	ED	*ED denotes electronic distri	



CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-038

2. Activity No: A-11-11

3. Page 1 of 2.**Block # 16 Acceptance of Proposed Corrective Action**

The following is an evaluation of the proposed Corrective Action Plan (CAP) for Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 11-038 submitted via URS Washington TRU Solutions LLC letter CP:11:01415, UFC: 2300.00, dated June 13, 2011, from D. K. Ploetz to Mr. Dennis S. Miehl. Italicized text, taken verbatim from the CAP, is used to show the correlation between the proposed corrective actions and evaluations performed by the audit team.

REMEDIAL ACTIONS

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

- a) CCP has corrected the revision number (zero to four) in Q&MIS and on the hard copy FGA-01 qualification forms that were completed by Operators/ITRs using the form with the incorrect revision number.*
- b) As noted in the Extent section of this Corrective Action Plan, CCP performed a review and there were no other cases where the condition described in the CAR occurred.*

Evaluation:

Review of the proposed CAP associated with Remedial Actions, submitted by the above referenced letter, determined that the proposed corrective actions are acceptable.

INVESTIGATIVE ACTIONS***Extent***

The condition occurred approximately a year ago, at the time when CCP Training made the decision to begin taking advantage of the approval tracking features available in Q&MIS. Training personnel entered existing qualification cards into Q&MIS so that approvals could be provided and tracked electronically, with automatic notifications at each level of review. All existing qualification cards were entered into Q&MIS at that time, so there is no potential for the CAR condition to recur. CCP performed a review and the FGA-01 qualification card was the only one entered into Q&MIS where Training neglected to manually change the revision number from the Q&MIS default setting of revision zero. The CAR condition is an isolated event.

Impact

As noted in the CAR, this was an administrative issue with form revision, not content, and does not affect qualification of personnel. There is no technical impact from the CAR condition.

Evaluation:

Review of the proposed CAP associated with Investigative Actions, submitted by the above referenced letter, determined that the proposed corrective actions are acceptable.

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-038

2. Activity No: A-11-11

3. Page 2 of 2.

ROOT CAUSE DETERMINATION

In accordance with CBFO direction for this CAR, the Central Characterization Project (CCP) has addressed Remedial Actions, Investigative Actions, and Actions to Prevent Recurrence.

Evaluation:

A root cause determination is not required for this CAR. This is acceptable.

ACTIONS TO PREVENT RECURRENCE

To assist CCP in determining actions whether actions to prevent recurrence are warranted for the CAR condition, CCP applied the "Just Culture" Culpability Decision Tree tool that is integral to the Human Performance Improvement (HPI) process. This HPI screening tool consists of a series of questions that guide the user to the correct decision regarding the need for preventive action. The attachment to this Corrective Action Plan describes the way that the criteria were applied to the situation described in the CAR.

The HPI Culpability Decision Tree shows that the CAR condition is a blameless error for which no preventive actions are appropriate.

Evaluation:

Review of the proposed CAP associated with Actions to Prevent Recurrence, submitted by the above referenced letter, determined that the proposed corrective action is acceptable.

ACCEPTANCE

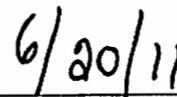
The proposed corrective actions for remedial actions, investigative actions, and actions to prevent recurrence are acceptable. Contingent upon submission of the final closure documentation (*including evidence that all FGA-01 qualification cards were issued using the correct revision number*), it is recommended that the CAP for CAR 11-038 be approved.

Response Evaluated By:



Cindi Castillo

CBFO Technical Assistance Contractor



Date