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



JUL 7 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 Documentation Supporting Closure of CAR 11-038 from Audit A-11-11, Los Alamos National Laboratory Central Characterization Project Activities

Dear Mr. Ploetz:

Enclosed is the Carlsbad Field Office (CBFO) CAR Continuation Sheet providing an evaluation of the Corrective Action Report (CAR) 11-038 closure documentation submitted in your letter CP:11:01438 dated June 21, 2011. The results of the evaluation indicate acceptance of the submitted closure documentation. Accordingly, CBFO CAR 11-038 is considered closed.

If you have any questions regarding this CAR closure, 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
M. Navarrete, CBFO	ED	R. Lee, EPA	ED
N. Castaneda, CBFO	ED	J. Kieling, NMED	ED
D. Haar, WTS/CCP	ED	T. Hall, NMED	ED
V. Cannon, WTS/CCP	ED	S. Holmes, NMED	ED
A. J. Fisher, WTS/CCP	ED	T. Kesterson, DOE OB WIPP NMED	ED
M. Walker, WTS/CCP	ED	D. Winters, DNFSB	ED
Y. Salmon, WTS/CCP	ED	P. Gilbert, LANL-CO	ED
J. Hoff, WTS	ED	G. Lyshik, LANL-CO	ED
M. A. Mullins, WTS	ED	C. Castillo, CTAC	ED
G. Rael, LASO	ED	P. Hinojos, CTAC	ED
L. Bishop, LASO	ED	G. White, CTAC	ED
T. Peake, EPA	ED	WIPP Operating Record	ED
M. Eagle, EPA	ED	CBFO QA File	
E. Feltcorn, EPA	ED	CBFO M&RC	
		*ED denotes electronic distribution	

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CAR CONTINUATION SHEET

1. CAR No: 11-038

2. Activity No: A-11-11

3. Page 1 of 3**Block # 17 Acceptance of Corrective Action Completion:**

An evaluation was performed of the completion of corrective actions related to Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 11-038. The notification of completion of corrective actions was submitted via URS Washington TRU Solutions LLC letter CP:11:01438 dated June 21, 2011, from D. K. Ploetz, Manager, Central Characterization Project, Retrieval, Characterization and Transportation, to Mr. Dennis S. Miehls, Senior Quality Assurance Specialist, Carlsbad Field Office. *Italicized text taken verbatim from the approved corrective action plan (CAP) is used to show the correlation between the proposed corrective actions and the verification performed by the audit team. The methods used in verifying completion of each corrective action are also described below.*

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.*

Verification:

The audit team determined through review of the submitted objective evidence that the FGA-01 qualification cards previously issued with the incorrect revision number (0) were in fact changed to the correct revision number (4). The audit team reviewed hardcopies of 15 FGA-01 qualification cards and verified that these records were corrected.

The audit team also physically viewed the Q&MIS training program in the Central Characterization Project Document Control area to determine that the correct revision number (4) of the FGA-01 qualification card is now available for use and the previous revisions in the Q&MIS are indeed obsolete. A printed screen shot from the Q&MIS system was also provided as objective evidence.

The audit team determined that these actions were an adequate representation of completion of all corrections and were appropriate to address and resolve the CAR condition.

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.

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CAR CONTINUATION SHEET

1. CAR No: 11-038

2. Activity No: A-11-11

3. Page 2 of 3.*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.

Verification: (Extent)

The audit team viewed the FGA-01 qualification card template in the Q&MIS system and verified that it has been changed to the correct revision (4). After reviewing the information in the Q&MIS system related to the revision numbers of qualification cards, the audit team verified that Training personnel neglected to manually change the revision number from the defaulted setting of revision 0 to revision 4 for the FGA-01 qualification card. This condition was not a systematic error, only a manual error.

Verification: (Impact)

The audit team determined through the review of the Q&MIS system that this CAR condition was an administrative issue with the form revision number and not with the content of the form. This did not affect the qualification of the fifteen (15) personnel who were issued the incorrect FGA-01 qualification card. There is no technical impact.

The audit team determined that the investigative actions performed are an adequate representation of completion of all corrections to the Q&MIS system and associated qualification cards, and are adequate to address and resolve the CAR condition.

ROOT CAUSE DETERMINATION

A root cause determination was not required for this CAR.

ACTIONS TO PRECLUDE 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.

Verification:

The audit team confirmed through a review of (1) the *Culpability Decision Tree* tool, and (2) the "attachment questionnaire" provided with the CAP on June 13, 2011, that the CAR condition is a blameless, manual, human error and that no preventive actions were appropriate. The tool is used along with a series of questions that guide the user to the correct decision regarding the need for preventive action. The attachment to the tool described the way the criteria is applied to this CAR situation and it helped determine that there is no appropriate preventive action since it was the result of human error.

The actions taken to preclude recurrence are adequate to address the conditions related to the CAR.

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CAR CONTINUATION SHEET

1. CAR No: 11-038

2. Activity No: A-11-11

3. Page 3 of 3.

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 11-038 be considered closed.

VERIFICATION PERFORMED BY:

Cindi Castillo

Cindi Castillo, Quality Assurance Auditor
Carlsbad Field Office Technical Assistance Contractor

4/23/11

Date