



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
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JUL 21 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: Verification and Acceptance of Corrective Actions for CAR 11-020 from Audit A-11-06,
 Central Characterization Project Quality Assurance Audit

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 11-020, which resulted from Audit A-11-06. The results of the verification are documented on the enclosed CAR Continuation Sheet, which indicate that the documentation of completion of corrective actions is acceptable.

The verification concluded that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 11-020 is considered closed.

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

Sincerely,

Dennis S. Miehls
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure			
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*ED denotes electronic distribution



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CAR CONTINUATION SHEET

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Block # 17 Acceptance of Corrective Action Completion:

An evaluation was performed of the proposed actions detailed in the closure documentation supporting completion of corrective actions associated with Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 11-020. The closure package was submitted via WTS letter CP:11:01461, dated June 30, 2011, from Mr. D. K. Ploetz, Manager, Retrieval, Characterization and Transportation, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, CBFO. The methods used to verify completion of each corrective action, as detailed in the approved corrective action plan (CAP), are described below.

Italicized text, taken verbatim from the supporting documentation for this closure package, is used to show the correlation between the proposed corrective action and the method used for 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.*

Verification:

The audit team verified that the topics covered during a briefing to CCP Document Services Personnel were included in the corrective actions identified in CBFO CAR 11-020. The topics in this briefing are:

- The preparers of the records packages – the CCP Technical Editors, and those reviewing and approving the packages – have the primary responsibility for ensuring that the information in these quality records is accurate, complete, and legible.*
- As a routine part of the job, document records should be checked for obvious errors or omissions whenever they are being created.*
- 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.*

The audit team met with CCP personnel and verified through review of supporting documentation that CCP is now distinguishing between in-process and validated records packages kept in Document Services. A "Validated" statement was observed in each record package that was completed. A random selection was evaluated to verify that the record packages kept in Document Services are being completed in accordance with procedure CCP-QP-008. File folders in pending cabinets are validated and complete. Also evaluated were the file folders for current record packages. All packages evaluated were accurate, complete and legible. Each package had a validation statement included in the folder.

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The following items identified as supporting closure documentation were sent in a copy of an e-mail stating that CCP is now distinguishing between in-process and validated records packages, that all in-process records packages have been validated, and that a "Validated" statement has been placed in each records package that has been validated. A copy of the briefing provided to Document Services Personnel, with the completed attendance roster and a copy of the validation statement page to be inserted in all validated records packages, was sent in as supporting closure documentation.

The audit team determined that the remedial actions performed are adequate to address and resolve the CAR condition.

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.

[Per evaluation of the Revised CAP, the investigation of this deficiency was found to be insufficient. The records that were presented as Controlled Document (Current/Historical) being maintained as QA Records are not the ones that were randomly evaluated. This investigative action was accepted under the condition that further investigation would be completed on the appropriate record packages and that evidence of the packages reviewed would be provided in this CAR closure.]

Verification:

The audit team reviewed supporting closure documentation provided by the CCP QA department as an independent confirmation of the effectiveness of the validation process.

CCP QA performed a spot check of a sample of twelve (12) completed and validated document record packages in Document Services. The review showed that the record packages were well-organized and free of the conditions reported in the CAR.

The audit team determined that the investigative actions performed are adequate to address and resolve the CAR condition.

ROOT CAUSE DETERMINATION

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

This evaluation was addressed in the Revised CAP.

[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 noncompliance. 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 recur. Based on the review and acceptance of the

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stated remedial actions and actions to prevent recurrence, this root cause is acceptable.]

The audit team determined that the root cause performed was adequate to address and resolve the CAR condition.

ACTIONS TO PREVENT RECURRENCE

- a) *CCP will begin placing a "validation" statement in each records package that has been "validated," so that "validated" records 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.*

Verification:

The audit team verified the effectiveness of the Validation Process by performing a random selection of record packages. The record packages were reviewed and approved by the CCP Technical Editors to ensure that the information in these quality records is accurate, complete, and legible. The selection of record packages evaluated showed that they were being completed in accordance with procedure CCP-QP-008. The audit team also verified that the briefing provided to Document Services personnel was adequate and effective.

The audit team determined that the actions to prevent recurrence are adequate to address and resolve the CAR condition.

CONCLUSION

Based on the review of the completion documentation submitted, it has been determined that the remedial, investigative, root cause determination, and actions to prevent recurrence of the CAR condition have been satisfactorily implemented. Therefore, it is recommended that CAR 11-020 be considered closed.

Evaluation performed by

Priscilla Y. Martinez
Priscilla Y. Martinez

7-11-11

Date