



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
APR 18 2012



Mr. Michael L. Sensibaugh, Manager
Central Characterization Project
Washington TRU Solutions, LLC
P.O. Box 2078
Carlsbad, NM 88221 – 2078

Subject: Evaluation of Corrective Action Plan for Corrective Action Report 12-011
Resulting From Audit A-12-09, Central Characterization Project Quality
Assurance Program

Dear Mr. Sensibaugh:

The Carlsbad Field Office evaluation of the Corrective Action Plan submitted by
Washington TRU Solutions in response to Corrective Action Report (CAR) 12-011
resulting from Audit A-12-09 is detailed on the enclosed CAR Continuation Sheet.

If you have any questions, please contact me at (575) 234-7548.

Sincerely,

Courtland G. Fesmire, P.E.
Quality Assurance Engineer

Enclosure



Mr. Michael L. Sensibaugh

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cc: w/enclosure
R. Unger, CBFO *ED
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J. R. Stroble, CBFO ED
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K. D. Martin, CTAC ED
P. Hinojos, CTAC ED
G. White, CTAC ED
WIPP Operating Record ED
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

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2. Activity No: A-12-09

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Block # 16 Acceptance of Proposed Corrective Action

An evaluation was performed of the Central Characterization Project (CCP) Corrective Action Plan (CAP) developed in response to Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 12-011. The CAP, dated April 12, 2012, was submitted by M. Percy for M. Sensibaugh, CCP Manager, Washington TRU Solutions, LLC, to Courtland G. Fesmire, CBFO Quality Assurance Engineer.

Italicized text, taken verbatim from the CAP, is used to show the correlation between the proposed corrective actions and evaluations performed by a Quality Assurance representative.

REMEDIAL ACTIONS

Washington TRU Solutions (WTS) has taken and proposes the following Remedial Actions in response to the CAR condition:

- a. *CCP identified the additional documentation necessary for inclusion in document records packages and has begun preparing packages that capture these documents. The documentation includes the all of the information listed in the CBFO CAR. To ensure that the information will uniformly be included in document records packages from now, on, CCP has issued project Standing Order CCP-SO-093, identifying the documentation necessary for acceptable packages.*

Evaluation:

A review of the proposed CAP associated with the Remedial Actions has determined that the proposed corrective actions are acceptable.

INVESTIGATIVE ACTIONS

WTS has taken and proposes the following Investigative Actions in response to the CAR condition:

In March 2011, CCP revised CCP-QP-010 and the associated RIDS to reflect changes made to the content of the document records packages prepared by Document Services. This action was taken in response to CBFO CAR 11-020, which was primarily targeted at the status of these packages (in-process versus validated) and the timeliness of submittal to the records archives. As part of the actions resulting from the CAR, CCP reduced the amount of information contained in each package. CCP provided objective evidence that all the required reviewers in Q&MIS had approved the document: the packages still contained some direct evidence of comment resolution, but not to the same degree as before. During the audit, CBFO concluded that the pendulum had swung a little too far. The packages don't need to be as voluminous as before, but there are a few more things that should be included, primarily more information supporting comment resolution.

Extent

The CAR condition extends to document review packages prepared since the March 2011 revision to CCP-QP-010.

Impact

There is no significant technical or quality impact from the CAR condition. There is no question regarding the approval status of CCP documents. In every case, all required approvals were

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obtained and captured in Q&MIS before the documents were issued for use. The only issue is that some document records packages do not have some of the details showing exactly how individual comments were resolved. The adequacy of document content was confirmed by all approvers before any documents were issued for use.

Evaluation:

A review of the proposed CAP associated with Investigative Actions has determined that the proposed corrective actions are acceptable.

ROOT CAUSE

Not required.

ACTIONS TO PRECLUDE RECURRENCE

WTS has taken and proposes the following Actions to Preclude Recurrence in response to the CAR condition:

- a) *CCP has revised CCP-QP-010 to identify additional information that is to be included in document records packages to ensure that evidence of comment resolutions is part of these packages. [Complete: April 11, 2012]*
- b) *CCP has issued project Standing Order CCP-SO-093 with additional detail about the specific documents that must be included in document records packages in order to ensure compliance with CCP-QP-010. [Complete: April 10, 2012]*
- c) *In parallel with the revision to CCP-QP-010, CCP has revised the RIDS section on document records packages to reflect the additional information needed for evidence of comment resolution. [Complete: March 21, 2012]*

Evaluation:

A review of the proposed CAP associated with Actions to Preclude Recurrence has determined that the proposed corrective actions are acceptable.

ACCEPTANCE

The result of the CAP evaluation indicates that the CAP provides adequate remedial and investigative actions, as well as actions to prevent recurrence, as required by CAR 12-011. Therefore, it is recommended that the CAP for CAR 12-011 be approved.

Response Evaluated By:

Katelyn Martin
Katelyn Martin/CTAC

4/12/12
Date