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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
OCT - 2 2012



Mr. M. L. Sensibaugh, Manager
Central Characterization Program
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Evaluation of the Revised and Supplemented CAP for CBFO CAR 12-033,
Generated During Audit A-12-12

Dear Mr. Sensibaugh:

The Carlsbad Field Office (CBFO) review and evaluation of the revised and supplemented Corrective Action Plan (CAP) dated September 17, 2012, for Corrective Action Report (CAR) 12-033, has been completed and is documented on the enclosed CAR Continuation Sheets. The evaluation results conclude that the CAP for CAR 12-033 is acceptable.

Acceptance of the CAP is contingent upon completion of all corrective action activities by October 8, 2012. Upon completion of all corrective actions, and in accordance with your proposed schedule, please provide supporting documentation as evidence of completion so that verification activities may be performed.

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

Sincerely,

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

Enclosure



cc: w/enclosure
J. Franco, CBFO *ED
R. Unger, CBFO ED
J.R. Stroble, CBFO ED
T. Morgan, CBFO ED
M. Pinzel, CBFO ED
N. Castaneda, CBFO ED
F. Sharif, NWP ED
T. Reynolds, NWP ED
D.K. Ploetz, NWP/CCP ED
V. Cannon, NWP/CCP ED
A. J. Fisher, NWP/CCP ED
I. Quintana, NWP/CCP ED
M. Walker, NWP/CCP ED
Y. Salmon, NWP/CCP ED
J. Carter, NWP/CCP ED
J. Hoff, NWP ED
M. Mullins, NWP ED
G. Rael, LASO ED
L. Bishop, LASO ED
T. Peake, EPA ED
M. Eagle, EPA ED
L. Bender, EPA ED
E. Feltcorn, EPA ED
R. Joglekar, EPA ED
S. Ghose, EPA ED
R. Lee, EPA ED
J. Kieling, NMED ED
T. Kliphuis, NMED ED
S. Holmes, NMED ED
R. Maestas, NMED ED
T. Kesterson, NMED/DOE OB ED
J. Marple, NMED/DOE OB ED
D. Winters, DNFSB ED
P. Gilbert, LANL-CO ED
G. Lyshik, LANL-CO ED
P. Hinojos, CTAC ED
G. White, CTAC ED
G. Knox, CTAC ED
C. Simmons, NWP/CCP ED
WIPP Operating Record ED
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

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Item 16. Acceptance of Proposed Corrective Actions:

An evaluation was performed of the proposed corrective actions detailed in the revised corrective action plan (CAP) developed in response to Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 12-033. The revised CAP was submitted via letter CP:12:01433:UFC:2300.00, dated August 30, 2012, from Mr. M. L. Sensibaugh, Manager, Central Characterization Project, Retrieval, Characterization and Transportation, to Mr. Courtland Fesmire, Quality Assurance Engineer, Carlsbad Field Office. This evaluation also included supplemental information provided via letter CP:12:01441:UFC: 2300.00, dated September 17, 2012, from Mr. M. L. Sensibaugh, Manager, Central Characterization Project, Retrieval, Characterization and Transportation, to Mr. Courtland Fesmire, Quality Assurance Engineer, Carlsbad Field Office. Italicized text, taken verbatim from the CAP, is used to show the correlation between the proposed corrective actions and the evaluations performed by the audit team.

REMEDIAL ACTIONS

- a) *As stated in the Impact section of this Corrective Action Plan, the CAR condition is an administrative issue and does not reflect on the qualification of the operators.*
- b) *As stated in the Impact section of this Corrective Action Plan, the CAR condition is an administrative issue and does not reflect on the qualification of the operators.*
- c) *Revision 1 to NCR-LANL-1004-12 was issued on July 30, 1012; the revision corrected the information in Block 19(b) of the NCR.*
- d) *CCP standard practice, having the dispositioned NCR in hand at the time that changes are made to project-level BDRs, has been discussed with the responsible SPM, the operators who made the changes, and the ITR who reviewed the BDR before the NCR was written.*

Evaluation:

A review of the remedial actions performed has determined that the actions are acceptable.

INVESTIGATIVE ACTIONS***Extent***

- a) *There are examples of the CAR condition in CCP qualification cards for some positions at all Host locations. The condition is not limited to qualification cards for personnel performing work at LANL.*
- b) *The CAR condition exists for CCP qualification cards for all positions at all Host locations and in the Project Office.*
- c) *The CCP investigation identified one other example of erroneous completion of block 19: ncr-rl-0622-11, Revision 1. Research included examination of all 2012 revised LANL NCRs, all revised 2012 SRS NCRs, a sampling of 2011 revised ORNL and 2011 revised RL NCRs. The conclusion is that such errors are very infrequent, and generally occur when the responsible manager (who is responsible for completing block 19) is someone who only rarely dispositions NCRs.*
- d) *The CCP investigation did not result in the identification of any other cases where the CAR condition occurred.*

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Impact

The Impact section is solely to evaluate the consequences had the deficiencies had remained undetected, and not been identified and corrected when they were. It is completely separate from determinations of procedure compliance, programmatic implications, and management inattention to detail.

- a) During the audit, it was agreed that the CAR condition is an administrative issue and does not reflect on the qualification of the operators.*
- b) During the audit, it was agreed that the CAR condition is an administrative issue and does not reflect on the qualifications of the operators.*
- c) The vast majority of nonconforming conditions documented by NCRs are of a nature such that corrective or preventive actions are not needed: when they are, a CAR is prepared in accordance with CCP program requirements and documented in Block 10 of the NCR form.*
- d) The corrections made by the HSG operators and re-reviewed by the ITR before NCR-LANL-1010-012 was written were re-reviewed by the SPM on July 24, 2012, after the NCR was inserted into the BDR, and the BDE changes were confirmed to be in accordance with the NCR.*

Evaluation:

A review of the actions associated with Investigative Actions has determined that they are acceptable.

ROOT CAUSE

- a) The root cause for the CAR condition was management failure to recognize that annual correspondence identifying Lead and Alternated SPMs with "...updates as necessary throughout the year..." would not be sufficiently responsive to dynamic conditions within CCP. Management set up a procedural control that depended on the day-to-day availability of either the Lead or Alternated SPM, without putting in place and infrastructure to react to illness, vacations, or temporary re-assignment of personnel. The annual correspondence was created to provide periodic snapshots of key CCP personnel assigned to Host locations, and then put to a use for which it was neither intended nor well-suited.*

A contributing cause was the fact that the annual correspondence lists a number of other SPMs below the blocks designating the Lead and Alternated positions, stating that "In addition, the following CCP personnel are qualified." The October 2011 annual correspondence for LANL lists 19 SPMs in this (also qualified) category. CCP Training interpreted this statement to mean that any of the listed SPMs were authorized to act as alternates for purposes of qualification card approvals.

- b) The root cause for the CAR condition was management failure to fully grasp the consequences of a change to the requirements for approval of qualification cards that was implemented by CCP several years ago. At one time, the Training organization was the final approval authority for CCP qualification cards. Several years ago, CCP management made the determination that Training should not be signing qualification cards for approval, and changed the requirements in CCP-QP-002 and on the qualification cards. At this point, the SPM became the final approver for CCP qualification cards processed under CCP-QP-002.*

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When Training was the final approver on CCP qualification cards, it was clear that completion of the blocks assigned to Training would be completed at the time that they were performing their final approval function. When the change was made to CCP-QP-002, management failed to consider that the responsibilities section for the SPM should be revised to address the fact that some blocks assigned to Training would not be completed at the time the SPM signed the qualification cards as final approver.

- c) *For NCR-LANL-1004-12, the root cause for the nonconformance was less-than-optimal design of the Nonconformance Report form, Attachment 1 to CCP-QP-005. Block 19 was divided into three (3) sections, and instructions for completion of the disposition varied, depending on the disposition category, namely, "use-as-is," "Reject," "Repair," "Rework," or "Scrap." On rare occasions, the complex nature of the required justification/completion instructions/corrective actions resulted in the responsible manager making an entry in the wrong section of Block 19.*

For NCR-LANL-1010-12, the intent of block 19© was for the responsible manager to evaluate whether corrective or preventive actions needed to be applied, beyond those actions needed to resolve the technical nonconformance. Most nonconforming conditions do not require corrective or preventive actions, needing only a simple correction. If the NCR condition is significant, then a CAR will be issued in accordance with the instruction in Block 10 of the NCR form. The intent of block 19(c) was to require the responsible manager to consider the usefulness of Lessons Learned, briefings, additional training, or procedure revision, in a particular case.

The requirement to document this evaluation for rework and repair NCRs is new; it was introduced in March 2012, with the issuance of Revision 21. Prior to that time, the instructions for the "Corrective Action" block were different, and "N/A" was an acceptable and almost universal entry. When the procedure changed, personnel failed to follow the new requirements and continued to enter "N/A" as the (understood but not procedurally-compliant) equivalent of "No action required."

- d) *On Thursday, July 19, 2012, the SPM spoke with the operators who performed the HSG sampling and they agreed that the BDR was in error and needed to be corrected. The SPM told the operators that she was writing the NCR and they should go ahead and make the changes; her thinking was that the NCR would be validated (in parallel) by the time the changes were incorporated into the BDR, even though the operators would not have the NCR in their hands.*

The SPMs intention was to generate the NCR herself and have it validated by the QA Engineer stationed at LANL. However, CCP-QP-005 states that "Any NCR generated after the DGL validation and verification of a BDR will be...processed through the Carlsbad Project Office." Because the SPM was not immediately aware that the NCR had to go to the Project Office, processing and validation was delayed until July 23, 2012, the following Monday.

The SPM was influenced by the fact that the LANL recertification audit was starting soon, and the BDR was one that has been requested for review. In her haste to get the BDR corrected before the audit, she allowed BDR corrections to be made in parallel with NCR preparation and validation. In addition, the operators complied with this direction instead of requiring the validated NCR before making changes to the BDR. As a consequence, the BDR was corrected before the NCR was written.

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The root cause analysis revealed a weakness in CCP procedural requirements for initiating NCRs that are necessary for correction of project-level BDRs. Standard practice is, and always has been, for data-affecting changes to project-level BDRs to be made with the validated NCR in hand. However, management failed to ensure that this requirement was clearly reflected in CCP procedures.

Evaluation:

A review of the root cause determinations has found the conclusions to be acceptable.

1. Actions to Prevent Recurrence

- a) *CCP will revise CCP-QP-002 to allow any qualified SPM to approve CCP qualification cards. This change aligns the requirements with current practice, and eliminates an overly-restrictive step in the process.*
- b) *CCP withdraws the previous corrective action to revise CCP-QP-002 allow an exception for entries by Training after the SPM has signed the qualification card. CCP will enforce the requirements of CCP-QP-002 as written, such that the SPM ensures that qualification and training documentation is complete.*

Supplemental:

CCP has taken the action below to ensure that the above requirements of CCP-QP-002 are enforced as written; CCP has issued an e-mail to CCP management, to include the CCP Manager, with the following direction:

*"Qualification cards [are to] be returned to CCP Training without the SPM signature. Training will make their entries and then obtain SPM approval.
If the SPM does sign the qualification card before it goes back to Training, Training will make their entries and then obtain a second SPM Signature.
In all cases, we will have an SPM signature at a time when the card is complete, including entries made by training.
We will enforce the requirement as written."*

- c) *CCP will revise CCP-QP-005 to modify Attachment 1, the Nonconformance Report, simplifying and clarifying the requirements described in Block 19 of the form.*
- d) *CCP will:*
 - i. *Revise CCP-TP-001 to clarify that the data-affecting changes to project-level BDRs must be made with the validated NCR in hand. CCP will develop specific language for incorporation into the revision of the procedure currently in Q&MIS for review and approval.*
 - ii. *CCP will issue a Lessons Learned addressing the requirements for making corrections to BDRs at Project Level, using the CAR condition as an example.*

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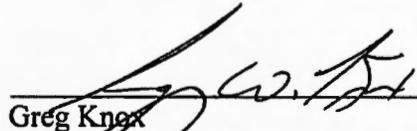
Evaluation:

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 proposed CAP adequately details the remedial actions taken, the results of investigative actions, the determination of the root cause, and the proposed corrective actions to preclude recurrence. This acceptance is contingent upon completion of all corrective action activities by October 8, 2012. Therefore, it is recommended that the proposed CAP for CAR 12-033 be approved.

Response Evaluated By:



Greg Knox
CBFO Technical Assistance Contractor

1 OCT 2012
Date