



Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
OCT 17 2012



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

Subject: Review and Verification of the Corrective Actions Submitted in Response to  
CBFO CAR 12-027

Dear Mr. Sensibaugh:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of the corrective actions submitted in response to CBFO Corrective Action Report (CAR) 12-027, which resulted from CBFO Audit A-12-13 of the Idaho National Laboratory Central Characterization Project Characterization and Certification Activities. The results of the verification are documented on the enclosed CAR Continuation Sheets, which indicate that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 12-027 is considered closed.

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

Sincerely,

*R. Unger*  
For Courtland G. Fesmire, P. E.  
Quality Assurance Engineer  
R. UNGER

Enclosure



Mr. M. L. Sensibaugh

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OCT 17 2012

cc: w/ enclosure

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G. Lyshik, LANL-CO	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
T. Bowden, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

\*ED denotes electronic distribution

## CAR CONTINUATION SHEET

1. CAR No: 12-027

2. Activity No: A-12-13

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**Block # 17 Acceptance of Corrective Action Completion:**

CBFO has performed an evaluation of the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 12-027, identified during CBFO Audit A-12-13, INL/CCP Characterization and Certification Activities. The closure documentation was submitted via URS Memorandum CP:12:01461 UFC:2300.00, dated September 26, 2012, from Mr. M. L. Sensibaugh, Manager, Central Characterization Project, to Mr. Courtland G. Fesmire, P.E., Quality Assurance Engineer, Carlsbad Field Office. The methods used to verify completion of the actions contained in the approved corrective action plan (CAP) are described below.

CAR 12-027 identified multiple documentation errors and deviations from procedure that indicated a condition of overall CCP inattention to detail. The CCP was required to address Remedial Actions, Investigative Actions, Root Cause, and Actions to Preclude Recurrence.

**REMEDIAL ACTIONS:**

The evaluation verified the following remedial actions:

1. NCR-INL-2041011 was added to BDR RTR5110051. Therefore, the condition was self-identified and self-corrected by CCP in June 2011.
2. Section 4 of the Radiography Data Sheet for container ND1081R was revised to show an estimated weight for the metal in the metal-framed HEPA filters.
3. The container number was corrected in the Batch Narrative of BDR INRTR5110094, from 1004632 to 10046232.
4. Questions 8 and 9 on the ITR checklist were changed to "Yes" to reflect the comment made by the operator on August 3, 2011, for replicate scan NRFTRUSPC074-1\_RS.
5. The BDR number was correctly recorded on the RTR Data Sheet for container number ANLE33G on March 7, 2012. Therefore, the condition was self-identified and self-corrected by CCP in March 2012.

**INVESTIGATIVE ACTIONS:**

Verification was performed to ensure that Extent and Impact of the conditions adverse to quality were investigated. During investigative actions, CCP identified and corrected additional deficiencies not identified in CAR 12-027.

CCP documented an adverse trend in the number of "inattention to detail" NCRs from the 1<sup>st</sup> half of 2010 to the 2<sup>nd</sup> half of 2010. Because of this adverse trend, CCP initiated CCP-CAR-0002-11 in February 2011. Corrective actions resulting from CCP-CAR-0002-11 were implemented in May 2011. Since that time, an improvement has been noted.

**ROOT CAUSE:**

The evaluation verified that CCP provided a Root Cause associated with the conditions adverse to quality associated with CAR 12-027. Discovery of the adverse trend in this area was the basis for issuing CAR-CCP-0002-11, resulting in the identification of programmatic lack of attention to detail as the root cause.

**ACTIONS TO PRECLUDE RECURRENCE:**

The evaluation verified the following Actions to Preclude Recurrence:

Five actions resulting from CAR-CCP-0002-11 (completed in 2011):

1. CCP developed Lessons Learned 2011-06, which identified the issues for this corrective action, reminding personnel that all information in the characterization process has value and should be treated with equal consideration.
2. CCP initiated SPM verification and validation of all outstanding RTR and NDA BDRs for CH waste produced from August 1, 2010, to February 1, 2011, and provided DGL with feedback regarding the quality of the data within the BDRs.

**CAR CONTINUATION SHEET**

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3. On May 12, 2011, at the same time that corrective actions for CAR-CCP-0002-11 were being developed and implemented, the CCP Manager issued Memorandum CP:11:01326 outlining his expectations for all CCP personnel in the areas of procedure compliance, quality of work, and stop work. The negative consequences of inattention to detail were described in this memorandum.
4. A separate action, taken after CAR closure as part of CCP's continuing attention to procedural compliance and inattention to detail, was enacted on August 23, 2011. The RCT Manager issued Policy Memorandum CP:11:01552 to all CCP personnel regarding the need to follow approved procedures. The policy outlines CCP Management's commitment to conduct of operations and establishes progressive disciplinary actions that will be taken, up to and including discharge for violators. Those actions have been carried out to-date on several occasions.
5. Additional actions involved monitoring CCP trending data for indicators that the actions taken were having a positive effect or if additional work was needed. The monitoring of trending data is documented in the Semiannual Report of the Central Characterization Project Quality Assurance Program provided to CBFO QA.

Four Actions Resulting from CAR 12-027:

1. Re-issue Lessons Learned 2011-06 to all CCP employees as a timely refresher.
2. Add "Attention to Detail" discussion to the CCP annual Conduct of Operations training to reinforce the importance of ensuring jobs are performed with diligence and thoroughness to eliminate mistakes that would otherwise go undetected.
3. Brief SPMs of the expectation that when a mistake is identified in a BDR or record, communication of the mistake to the VPM and/or Lead Operator, in addition to the Project Office NCR, is necessary to provide the right feedback to the DGL to stem the problem of inattention to detail.
4. CCP management will issue a memorandum identifying management expectations for performing independent technical reviews of BDRs. The memorandum will be addressed to operators/ITRs for RTR, NDA, HSG, VE, and FGA activities.

Based on the results of the review of the objective evidence included in the CAR 12-027 closure package, it is recommended that CAR 12-027 be closed.

Katie Martin for  
 Verification Performed By: Tamara D. Bowden

10-15-12  
 Date