Subject: Issuance of CARs 13-024, 13-025 and 13-026, Identified During Audit A-13-11

Dear Mr. Gulbransen:

The Carlsbad Field Office (CBFO) performed Audit A-13-11 of the Central Characterization Project Quality Assurance Program on April 16 - 18, 2013. Enclosed are CBFO Corrective Action Reports (CARs) 13-024, 13-025 and 13-026, addressing the conditions adverse to quality identified during the audit.

Please provide a documented response for the CARs, ensuring that the required actions indicated in Block 12 are addressed, including schedules for completion. Please return your responses to me on or before the due date identified in Block 14a.

If you have any questions or comments regarding the CARs, please contact me at (575) 234-7491.

Sincerely,

[Signature]

Dennis S. Miehls
Acting Quality Assurance Director

Enclosure
Mr. D. E. Gulbransen

cc: w/enclosure
M. Navarrete, CBFO *ED
J. R. Stroble, CBFO ED
N. Castaneda, CBFO ED
F. Sharif, NWP ED
T. Reynolds, NWP/CCP ED
A. J. Fisher, NWP/CCP ED
V. Cannon, NWP/CCP ED
M. Walker, NWP/CCP ED
J. Carter, NWP/CCP ED
J. Hoff, NWP ED
M. Mullins, NWP ED
T. Peake, EPA ED
L. Bender, 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
P. Gilbert, LANL-CO ED
G. Lyshik, LANL-CO ED
R. Castillo, CTAC ED
K. 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
CORRECTIVE ACTION REPORT

1. CAR No.: 13-024
3. Page 1 of 1

4. Controlling document: CCP-QP-002, Rev. 34
5. CBFO Assessment Team Leader: Dennis Miehls

6. Responsible organization: NWP CCP

7a. CAQ/CAR Owner (Office Director): N/A
7b. CAQ was discussed with: A.J. Fisher

8. Requirement that is involved: CCP-QP-002, Rev. 34, CCP Training and Qualification Plan, Section 4.1.2JG.41 states, "Other required formal training materials, such as the Waste Analysis Plan (WAP)/Quality Assurance Project Plan (QAP)/P) Briefing or training determined by a training evaluation (i.e. classroom, OJT, or self-paced instruction) shall be approved for format, technical content, and use by a SPM and the Manager Responsible for Training. (a) As initial and continuing qualification and training requirements change, these approved training materials shall be revised by Training. (b) All approved training materials shall be maintained, secured, and controlled by Training."

9. Condition Adverse to Quality (CAQ): CCP Training Module CCP-113, CCP Subject Matter Expert/On-the-Job Training Instructor, has a document number, revision number, and effective date; yet, changes were made to the electronic version of this module without a formal revision. The version of the document used by new Subject Matter Expert/On-the-Job-Training (SME/OJT) trainees is the electronic version, which contained information that was inaccurate. The auditee provided a revised briefing prior to close-out of the audit. However, the method used to revise and control training materials is not specified.

10. Suggested actions (Optional): N/A

11a. Significant CAQ? (If 'Yes', go to block 15b) Yes [X] No
11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes [X] No
11c. RCRA related? Yes [X] No
11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes [X] No
11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes [X] No

12. Type of actions required:
- Remedial? Yes [X] No
- Investigative? Yes [X] No
- Root Cause Determination? Yes [X] No
- Actions to Preclude Recurrence? Yes [X] No

13a. Trend Code: DC03
13b. CAR Initiator: [printed name] Kate Martin (Date: 4/25/13)

14a. Response due date: 4/21/13
14b. Required corrective action completion date: N/A

15. Concurrence:
   a. Assessment Team Leader: (if applicable): [printed name] Dennis S. Miehls (Date: 4/29/13)
   b. CBFO Quality Assurance Director: [printed name] Dennis S. Miehls (Date: 4/29/13)

16. Acceptance of Proposed Corrective Actions: [printed name] (Date: )

17. Acceptance of Corrective Action Completion: [printed name] (Date: )

18. Closure: [printed name] (Date: )
### Corrective Action Report

**1. CAR No.:** 13-025  
**2. Activity Report No.:** A-13-11  
**3. Page 1 of 1**

**4. Controlling document:*** CCP-QP-002, Rev. 34  
**5. CBFO Assessment Team Leader:** Dennis Miehls

**6. Responsible organization:** NWP CCP

**7a. CAQ/CAR Owner (Office Director):** N/A  
**7b. CAQ was discussed with:** A.J. Fisher

**8. Requirement that is involved:**
CCP-QP-002, Rev. 34, *CCP Training and Qualification Plan*, Step 3.2.10 states, "SPM, submit the briefing materials and the completed briefing sheet(s) (or personnel can send individual email acknowledgements) to Training. Also, Step 5.1.1 states, ‘Records generated during the performance of this plan are maintained as quality assurance (QA) records in accordance with CCP-QP-008. The records are the following: [F] Training materials (e.g., course presentation, exam) and [G] Completed attendance/briefing forms.”

**9. Condition Adverse to Quality (CAQ):**
Per CCP-QP-002, Rev. 34, the Site Project Manager (SPM) is required to submit Acceptable Knowledge (AK)/Waste Stream Training briefing materials, along with the completed briefing sheet(s), to training. During the auditor's review of AK briefings that were submitted to Training by the SPM, six of approximately 15 did not contain briefing materials. However, the auditee provided briefing materials for all briefings prior to close-out of the audit. It was noted that during the audit interviews, Training personnel were not familiar with the requirements to retain the AK briefing materials, as specified per procedural requirements. Training personnel did indicate that they retained the briefing materials with the briefing attendance sheets when they were submitted to Training. CCP-QP-002, Rev. 34, Section 3.2.10 requires both the briefing materials and briefing attendance sheets to be submitted to Training.

**10. Suggested actions (Optional):**
N/A

**11a. Significant CAQ? (If 'Yes', go to block 15b)**  
Yes [x] No [ ]

**11b. Work Suspension recommended? (If 'Yes', go to block 15b)**
Yes [x] No [ ]

**11c. RCRA related?**
Yes [x] No [ ]

**11d. Accelerated corrective action required? (If 'Yes', go to block 15b)**
Yes [x] No [ ]

**11e. Does this CAQ affect waste streams BNINW216 or BNINW218?**
Yes [x] No [ ]

**11f. Root Cause Determination? (If 'Yes', go to block 15b)**
Yes [x] No [ ]

**11g. Actions to Prevent Recurrence?**
Yes [x] No [ ]

**12. Type of actions required:**
Remedial? Yes [x] No [ ]
Investigative? Yes [x] No [ ]

**13a. Trend Code:** RM06  
**13b. CAR Initiator:** [Signature] Katie Martin  
**Date:** 4/25/13

**14a. Response due date:** 4/21/13

**14b. Required corrective action completion date:** N/A

**15. Concurrence:**

a. **Assessment Team Leader (if applicable):**
   [Signature] Dennis S. Miehls  
   **Date:** 4-29-13

b. **CBFO Quality Assurance Director:**
   [Signature] Dennis S. Miehls  
   **Date:** 4-29-13

**16. Acceptance of Proposed Corrective Actions:**

[Signature]  
**Date:**

**17. Acceptance of Corrective Action Completion:**

[Signature]  
**Date:**

**18. Closure:**

[Signature]  
**Date:**
# CORRECTIVE ACTION REPORT

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<tbody>
<tr>
<td>4. Controlling document:</td>
<td>CCP-QP-002, Rev. 34</td>
<td>5. CBFO Assessment Team Leader:</td>
<td>Dennis Miehls</td>
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<td>6. Responsible organization:</td>
<td>NWP CCP</td>
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<td>7a. CAQ/CAR Owner (Office Director):</td>
<td>N/A</td>
<td>7b. CAQ discussed with:</td>
<td>A. J. Fisher</td>
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<td>8. Requirement that is involved:</td>
<td>CCP-QP-030, Rev. 8, CCP Written Practice for the Qualification of CCP Helium Leak Detection Personnel, and CCP-QP-032, Rev. 1, CCP Written Practice for the Qualification of CCP Pressure Change Leak Testing Personnel, state in Section 4.7 of each procedure, “After the candidate has completed all required examinations in the allotted time, the ASNT LT-III or LT-III (L) shall grade and sign the examinations and/or checklists.”</td>
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<td>9. Condition Adverse to Quality (CAQ):</td>
<td>During the review of CCP Pressure Change Leak Testing Personnel Qualification files and CCP Helium Leak Detection Personnel Qualification files, it was identified that ASNT LT-III or ANST LT-III (L) personnel are not signing all exams after grading them.</td>
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<td>10. Suggested actions (Optional):</td>
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<td>11a. Significant CAQ? (If ‘Yes’, go to block 15b)</td>
<td>Yes ☒ No ☐</td>
<td>12. Type of actions required:</td>
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<td>11b. Work Suspension recommended? (If ‘Yes’, go to block 15b)</td>
<td>Yes ☒ No ☐</td>
<td>Remedial?</td>
<td>Yes ☒ No ☐</td>
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<td>11c. RCRA related?</td>
<td>Yes ☒ No ☐</td>
<td>Investigative?</td>
<td>Yes ☒ No ☐</td>
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<td>11d. Accelerated corrective action required? (If ‘Yes’, go to block 15b)</td>
<td>Yes ☒ No ☐</td>
<td>Root Cause Determination?</td>
<td>Yes ☒ No ☐</td>
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<td>11e. Does this CAQ affect waste streams BWINW216 or BWINW218?</td>
<td>Yes ☐ No ☒</td>
<td>Actions to Preclude Recurrence?</td>
<td>Yes ☒ No ☐</td>
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<td>14b. Required corrective action completion date:</td>
<td>N/A</td>
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