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memorandum


 Carlsbad Field Office
 Carlsbad, New Mexico 88221

DATE: August 15, 2013

REPLY TO
ATTN OF: CBFO:OQA:DSM:MAG:13-2010:UFC 2300.00

SUBJECT: Transmittal of the Amended CAP for CAR 13-023

TO: Oba L. Vincent, Acting Director, CBFO Office of Quality Assurance

Attached is the amended Corrective Action Plan (CAP) submitted in response to Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 13-023. As committed to in the original CAP, this amendment addresses the root cause and corrective action identified as a result of Surveillance S-13-23, which was performed as an investigative action described in the original CAP for CAR 13-023. Once the corrective action has been completed, evidence of completion will be submitted for your verification.

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

Dennis S. Miehls
 Senior Quality Assurance Specialist

Attachment

cc: w/attachment	
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CBFO QA File	
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*ED denotes electronic distribution

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**Amendment to the Corrective Action Plan
For CBFO CAR 13-023**

As committed to in the investigative action section of the original Corrective Action Plan (CAP), this amendment addresses the results of Carlsbad Field Office (CBFO) Surveillance S-13-23, *Concern Misclassification Evaluation*, performed in part to determine the apparent root cause and additional corrective actions necessary to reduce the likelihood of recurrence for the condition documented in CBFO Corrective Action Report (CAR) 13-023.

The reported results from Surveillance S-13-23 were evaluated on August 8, 2013. Surveillance S-13-23 identified 40 instances (during calendar years 2012 and 2013) where concerns identified during assessments had been classified as Observations when they should have been correctly classified as conditions adverse to quality thereby necessitating corrective action in accordance with CBFO management procedures (MP) 10.3, *Audits* and 3.1, *Corrective Action Reports*. Furthermore, the conclusion section of the surveillance report notes; "...for a period of time, the requirements for classifying concerns were not consistently applied....questions on classification could be attributed to different interpretations of the requirements of the CBFO QA program procedures and requirements during this time period." The time period noted in the report refers to the time period in which the CBFO Office of Quality Assurance (OQA) was in a transition period. A CBFO reorganization in August 2011 shifted personnel roles and areas of responsibility, and placed several personnel into quality assurance areas on detail assignments. As a result, the OQA was temporarily staffed with inexperienced personnel fulfilling the roles of quality assurance on only a temporary basis. Furthermore, the Director's position in the OQA was subsequently vacated in December 2012.

Based upon the evaluation of the results of Surveillance S-13-23, the following identifies the apparent root cause for the condition noted in CBFO CAR 13-023 and the additional corrective actions necessary to reduce the likelihood of recurrence.

Apparent Root Cause:

The transition experienced by the OQA during the time-period in question, coupled with the reported results of Surveillance S-13-23, suggest that the apparent root cause was attributed to personnel possessing limited knowledge/experience in the interpretation of quality assurance requirements for classifying assessment related concerns.

Corrective Action(s):

Commitment

Initiate CARs as remedial actions to address and correct the 40 instances of inappropriate classification identified during S-13-23.

Expected Completion Date

August 30, 2013

Temporary detail assignments were ended in February 2013 and personnel were returned to their prior roles and areas of responsibility. As a result, the OQA is now staffed with knowledgeable and experienced quality assurance personnel. Evidence also suggests that there have been no further instances of inappropriate classification of concerns with the current staff. Accordingly, no additional corrective actions are deemed necessary.