




Department of Energy
Carlsbad Field Office
P. O. Box 3090
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SEP 19 2013



To: Distribution

Subject: CBFO Semi-Annual CAR Trend Analysis Report for January 1 through June 30, 2013

The Carlsbad Field Office (CBFO) Corrective Action Report (CAR) Trend Analysis Report has been completed for the reporting period January 1, 2013 through June 30, 2013, (1st and 2nd quarters of calendar year 2012). Deficiencies included in the report (Attachment 1) were identified under CBFO Management Procedure (MP) 3.2, Revision 1, *Deficiency Trending and Reporting*.

The report summarizes trend information for CARs and items corrected during an oversight activity, usually either an audit or surveillance. Items contained in the report are those that were issued or closed (or both) during the reporting period. The report includes data for both Sites (i.e., waste generator sites, such as INL, LANL, SRS, etc.), and Core Participants (i.e., CBFO, WTS/NWP, CCP, local laboratories, etc.).

All deficiencies identified during the reporting period have been assigned trend codes in accordance with CBFO MP 3.2. Trend codes are defined in Attachment 2. The codes allow separation of issues into two categories: activity and deficiency. The activity category identifies functional areas such as waste characterization, and project activities such as Acceptable Knowledge (AK), Data Validation (DV), definition of Work Processes (WP), and Software (SW). The deficiency category addresses areas within an activity such as training (03), performance of work (05), and documentation of work (06).

The report is color-coded such that red defines a negative trend or event, yellow defines an area of concern or risk, and green defines a positive trend or event.

The following events are marked on the chart:

- "A" – Oct 2011 – CBFO management issues MP 3.1, Rev. 12, *Corrective Action Reports*, with a 60-day cycle time requirement. The requirement was intended to apply only to CBFO sites, but was misinterpreted to apply to all CARs issued.
- "B" – Oct 2011 through Feb 2012 – CBFO management applies increased focus on legacy CARs that had been open for a long time, some as long as three years.
- "C" – Aug 2012 – CBFO management issues Interim Change Notice to MP 3.1, Rev. 12, to clarify that the 60-day cycle time requirement applies only to CBFO CARs.
- "D" – Spring 2013 – While it is no longer a requirement for the cycle time to be less than 60 days (except for CBFO CARs), the trend for "CAR Cycle Times" is rising above what had been normal (60 to 90 days) for the previous year and is predicted to continue to rise as indicated by Event "E" described below.
- "E" – July 2013 – There are 19 active CARs as of the end of this reporting period. Of these, seven will meet the 60-day cycle time target. The average cycle time of all 19 CARs is 132 days (about twice the previous norm); however, some are over six months and one is a full 18 months. This is due primarily to the time required to ensure that corrective actions are sufficient. Quality Assurance (QA) personnel will closely monitor these actions to ensure that the requested corrective action time is appropriate.



Significant points of interest regarding trends and issues from the attached charts are provided below:

<p>Cycle Time Trend Chart</p>	<p>Event B led to the groundswell from October to December of 2011, and the spike artifact in March 2012 when the legacy CARs were cleaned up in the system. The cycle time then decreased to less than 50 days from April through June of 2012.</p> <p>Event C led to the slight rise in cycle time.</p> <p>We predict that with the current requirements of MP 3.1, the average CAR Cycle Time should nominally be 60 to 90 days.</p> <p>Event D, however, shows a rising trend approaching 100 days. QA will continue to monitor and evaluate the time required to complete corrective actions.</p>
<p>Count of CARs Closed Past Their Due Date Trend Chart</p>	<p>The introduction of Event C had a destabilizing effect on overdue CARs.</p> <p>This effect appears to have been temporary as indicated by 8 overdue CARs in 2011, 12 in 2012, and only 3 thus far in 2013.</p> <p>However, Event E is also a contributing factor. By lengthening the cycle time, logic suggests that the CARs are less likely to be overdue.</p>
<p>Count of Repeats Pareto Chart¹</p>	<p>The same three trend codes continue to be the main issues. Records management (RM), Work Processes (WP), and Management (MA) comprise 32 of the 55 repeat CARs.</p> <p>Over the past year, there has been increased emphasis on addressing the causes of Records Management CARs. Any improvements made have not yet been realized by a reduction in repeat findings.</p> <p>The repeat Work Processes CARs are being addressed through a focused team investigating Work Control issues at the Management and Operating contractor. For FY2014, this has been made a focus (fee-bearing) area within the operating contractor performance measurement plan. Approximately \$2,000,000 of the contractor's fee has been tied to the resolution of work control issues.</p> <p>CBFO Office Directors are engaging in more Management Assessments and other oversight activities. These activities are resulting in an increase in self-identified CARs that are predicted to increase the repeat CARs for all areas and more particularly those in the Management area. Although this may result in a negative trend in the numbers for a time, it should result in systemic improvement and overall reduction in the long run.</p>

<p>CARs/CDAs that are currently open and/or were closed in July 2013</p>	<p>CAR 12-038 is a Significant Condition Adverse to Quality (SCAQ) that was issued by the Office of Environment, Safety & Health due to repeat conditions. The responsible organization felt that the particular concerns would require 150 days to correct, which will negatively bias the current trend of about 90 days. This is one of the CARs (326 days as of this report and still open) that is contributing to the increasing trend in cycle times.</p> <p>Two other CARs have Corrective Action Plans (CAPs) with very long cycle times. CAR 13-009 is planned for 536 days and CAR 13-032 is planned for 175 days. These are also major contributors to the anticipated negative trend in cycle times.</p> <p>In reviewing these CAPs, it was determined that the requested time for implementation of the corrective actions was warranted. In at least one case, the CAR was associated with a "seasonal" activity which will require a full year for verification of closure.</p>
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A Pareto chart is a bar graph. The lengths of the bars represent frequency of occurrence. The bars are arranged with longest to the left and the shortest to the right. In this way, the chart visually depicts which situations are more significant.

A listing of activity and deficiency codes (Attachment 2) is included in this report in accordance with the requirements of CBFO MP 3.2.

Please review the trends on the attached chart with the appropriate personnel within your organizations for potential lessons learned that might be applicable to your operations. If you have any questions, please contact the CBFO Office of Quality Assurance.

Sincerely,



Oba L. Vincent
Acting Director, Office of Quality Assurance

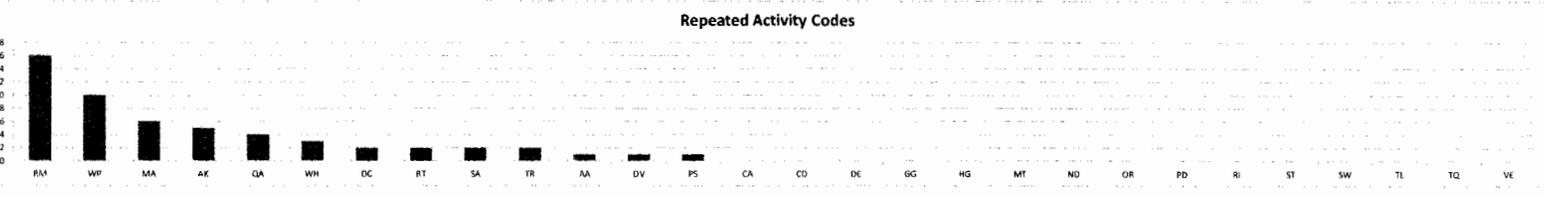
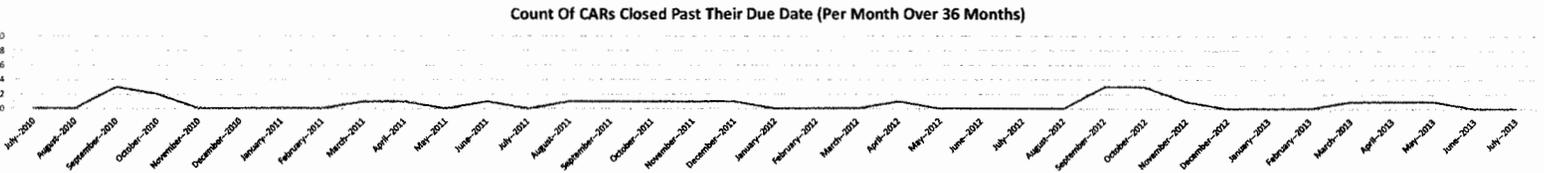
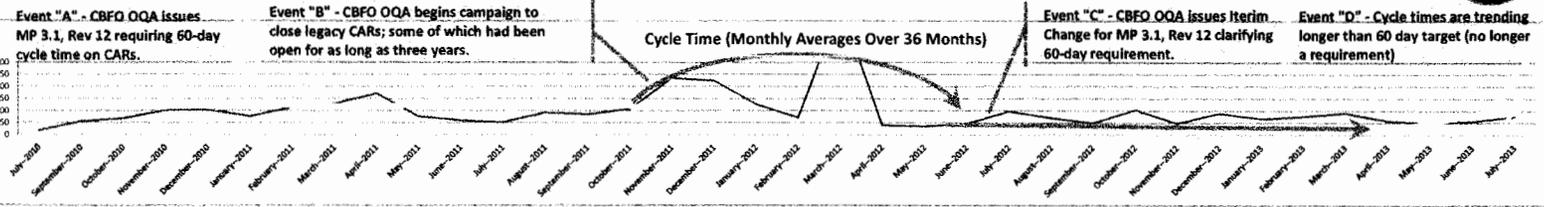
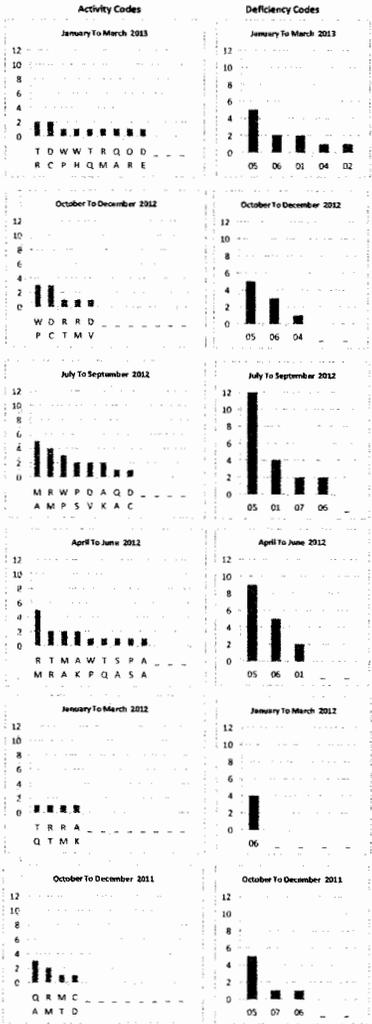
Enclosures (2)

cc: w/enclosures (2)

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*ED denotes electronic distribution

PORTAGECAR Trend Report for: January to June 2013 (Attachment 1)



CARs/CDA that are Open and/or Closed as of: July 2013											
Activity #	Alert Level	Organization	Type	Activity Code	Deficiency Code	SCAQ?	Released	Open	Closed	Due Date	Cycle Time (Days)
12-038	Watch	WTS Washington TRU Solutions	CAR	MA	05	No	2	8/31/2012		7/23/2013	326
13-009	Watch	NFO Nuclear Waste Partnership/Facility Operations	CAR	OR	01	No	0	1/24/2013		7/14/2013	536
13-014	Watch	NWP Nuclear Waste Partnership	CAR	TR	05	No	1	3/25/2013		7/11/2013	108
13-016	Watch	CBFO Carlsbad Field Office	CAR	DC	06	No	2	3/28/2013		6/21/2013	85
13-017	Watch	LC Los Alamos National Laboratory / Carlsbad	CAR	DC	01	No	0	4/12/2013		7/31/2013	110
13-018	Watch	LC Los Alamos National Laboratory / Carlsbad	CAR	DC	05	No	0	4/12/2013		8/30/2013	140
13-019	Watch	LC Los Alamos National Laboratory / Carlsbad	CAR	AA	06	No	0	4/12/2013		6/13/2013	62
13-021	Watch	NWP Nuclear Waste Partnership	CAR	WP	01	No	0	4/23/2013		7/26/2013	94
13-023	Watch	COA CBFO Office of Quality Assurance	CAR	CA	05	No	0	5/6/2013		10/17/2013	136
13-026	Watch	CCPNWP Nuclear Waste Partnership/Central Characterization Project (CCP)	CAR	RM	06	No	2	4/29/2013		6/17/2013	49
13-027	Watch	NWP Nuclear Waste Partnership	CAR	RM	06	No	0	5/7/2013		7/27/2013	81
13-028	Watch	NWP Nuclear Waste Partnership	CAR	WP	06	No	0	5/7/2013		8/13/2013	98
13-030	Watch	CCPNWP Nuclear Waste Partnership/Central Characterization Project (CCP)	CAR	RM	06	No	2	5/9/2013		6/10/2013	32
13-031	Watch	NWPM Nuclear Waste Partnership/Maintenance	CAR	RM	05	No	0	5/13/2013		8/13/2013	92
13-032	Watch	NWP Nuclear Waste Partnership	CAR	SA	01	No	1	5/23/2013		11/14/2013	175
13-040	Watch	CSO CBFO Office of Site Operations	CAR	CA	05	No	0	5/20/2013		1/28/2014	60
13-041	Watch	NWP Nuclear Waste Partnership	CAR	SA	01	No	1	6/27/2013		8/26/2013	60
A-13-18	Watch	CCPNWP Nuclear Waste Partnership/Central Characterization Project (CCP)	CDA/CDS	AX	06	No	0	6/6/2013		6/6/2013	0
A-13-18	Watch	CCPNWP Nuclear Waste Partnership/Central Characterization Project (CCP)	CDA/CDS	RY	06	No	1	6/7/2013		6/7/2013	0

Color Coding:

- SCAQ
- Alert Level = Warning
- Alert Level = Caution
- Alert Level = On Track

Event "E" - Cycle times are increasing to an average of 132 days and a few are much longer.

Prepared By: _____
 //signature on file//
 CTAC QA Specialist

Approved By: _____
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 CBFO QA Approval

Average Cycle Time: 132

Attachment 2

TREND CODES	
ACTIVITY CATEGORY	Code Number
Acceptable Knowledge (AK)	AK
Audits and Assessments	AA
Control of Measuring and Test Equipment (M&TE)	MT
Corrective Action Program (CARs and NCRs)	CA
Characterization Data	CD
Data Validation	DV
Design Control and Engineering	DE
Document Control	DC
Gas Generation Testing (GGT)	GG
Headspace Gas Sampling and Analysis (HGAS)	HG
Management	MA
Non-Destructive Assay (NDA)	ND
Organization and Resources	OR
Performance Demonstration Program (PDP)	PD
Procurement	PS
QA Program and Implementation	QA
Real-Time Radiography (RTR)	RT
Receiving / Receipt Inspection	RI
Records Management	RM
Safety/Operations	SA
Sampling Techniques	ST
Software	SW
Training and Qualifications	TQ
Transportation	TR
TRUPACT-II Leak Testing	TL
Visual Examination (VE)	VE
Waste Handling Operations	WH
Work Processes	WP

DEFICIENCY CATEGORY	Code Number
Definition of Work Process and Proceduralization	01
Identification of Work Steps	02
Training Materials and/or Training Presentations	03
Untrained Personnel	04
Performance of Work	05
Documentation of Work	06
Records Processing	07