



Department of Energy  
Carlsbad Field Office  
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MAR 5 2014

To: Distribution

Subject: Transmittal of CBFO Semi-Annual CAR Trend Analysis Report for the Period of July 1 through December 31, 2013

The Carlsbad Field Office (CBFO) Corrective Action Report (CAR) Trend Analysis Report has been completed for the reporting period July 1, 2013 through December 31, 2013. Deficiencies included in the enclosed 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 oversight activities, usually either an audit or surveillance. Items contained in the report were issued during the reporting period, closed during the reporting period, or both issued and closed during the reporting period. The report includes data for waste generator sites and for core participants such as the CBFO, Washington TRU Solutions/Nuclear Waste Partnership, LLC (WTS/NWP), the Central Characterization Program (CCP), and local laboratories.

All deficiencies identified during the reporting period have been assigned trend codes in accordance with CBFO MP 3.2. The trend codes (defined in Attachment 2) allow identification of issues under 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 using red to define a negative trend or event, yellow to define an area of concern or risk, and green to define a positive trend or event.

Significant points of interest regarding trends, events, and issues from the attached charts are provided in the following Table:



Cycle Time Trend Chart	The cycle-time for closure of CARs is currently below the average time calculated for open CARs. Event "A" resulted in a reduction of the numbers of CARs and CDAs issued in October, November, and December as assessments were postponed and/or rescheduled for calendar year 2014.
Count of CARs Closed Past Their Due Date Trend Chart	A positive trend is indicated where CARs appear to be closing before the due date for completion of corrective actions.
Count of Repeats Pareto Chart <sup>1</sup>	Three trend codes appear multiple times, thus defining the main issues. Activity Category Trend Codes for Records Management (RM), Work Processes (WP), and Management (MA) comprise 32 of the 55 tracked CARs. Recent efforts to address causes of RM CARs do not appear to have resulted in a reduction in repeat findings. The efforts of the review team that investigated repeat WP CARs do not appear to have resulted in a reduction of CARs in this category. It is possible that issues identified by CBFO Office Directors during MAs and other contractor oversight activities have resulted in the increase in CARs classified in the WP category. The anticipated systemic improvement and overall reduction of WP category CARs in the long-term have not yet been realized.
CARs/CDAs that are currently open and/or were closed in July 2013	CAR 13-041 is a significant condition adverse to quality (CAQ) issued by the CBFO Office of Site Operations (OSO) to address procedure inadequacy. Revision 3 of NWP procedure WP 04-CO.01-6 appears to no longer be in complete compliance with flow-down of the upper-tier requirements of DOE Order 422.1.

<sup>1</sup> A Pareto chart is a bar graph wherein the lengths of the bars represent frequency of occurrence of a specific subject item. The bars are arranged with longest to the left and the shortest to the right to visually depict which situations are more significant.

Managers are requested to review the trends on the attached chart with appropriate personnel within their organizations to identify any applicable lessons learned. If you have any questions, please contact the CBFO Office of Quality Assurance.

Sincerely,

  
Michael R. Brown, Director  
Office of Quality Assurance

Enclosures

cc: w/enclosures (2)

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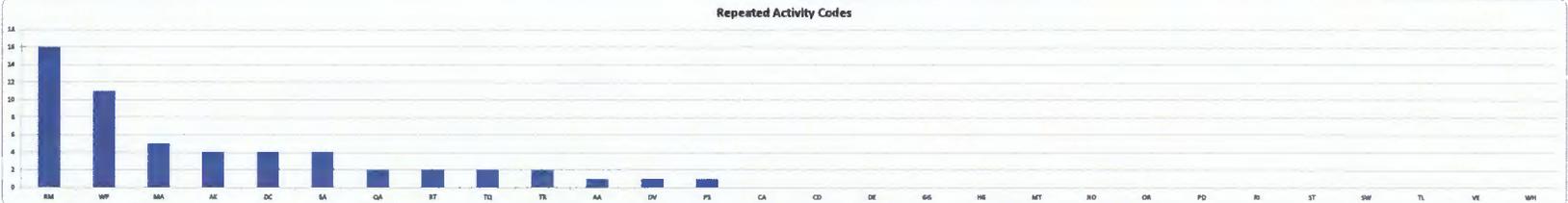
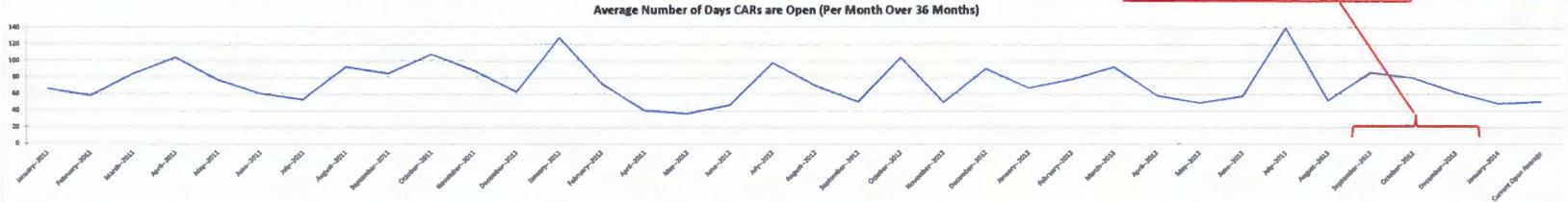


# 6 Month CAR Trend Report for July thru December of 2013

Event "A" - Federal Government Sequester Drives Preparation to Suspend Work @ WIPP suspending assessment activities and postponing audits and surveillances.



CAR Cycle Time By Activity Code			
Activity	Min	Avg	Max
AK	0	0	3
AA	53	123	163
AT	0	31	56
CA	0	42	146
CD	62	82	82
DV	0	24	84
DE	0	41	81
DC	0	66	167
GG	0	0	0
HIS	0	23	50
MA	0	104	325
ND	0	0	0
OR	0	0	0
PD	0	0	0
PS	41	83	138
QA	28	58	77
RT	0	26	91
RI	0	0	0
RM	0	59	184
SA	44	83	152
ST	0	0	0
SW	0	20	61
TQ	0	41	161
TR	0	41	109
TL	0	0	0
VE	0	0	0
WH	0	0	0
WP	0	53	113



CARs/CDA that are Open and/or Closed during July thru December of 2013 (calculated values based on report cut-off as of Feb 16, 2013)												
Activity Code	Alert Level	Title	Type	Activity Code	Deficiency Code	DCDEF	Open?	Open	Closed	Responsible Organization	Due Date	Days To Due
13-009	Watch	WIPP documentation covering Seasonal Facility Preservation	CAR	OR	01	No	0	1/24/2013		NWP/Facility Operations	7/13/2014	0 79
13-033	Watch	Lack of qualification documentation for RH SPM	CAR	TQ	06	No	2	7/31/2013		NWP/CCP	9/29/2013	7 53
13-034	Watch	Inattention to detail in documentation of work performed	CAR	WP	06	No	0	7/31/2013		NWP/CCP	9/29/2013	81 0
13-035	Watch	Inattention to detail in documentation of H2S work performed	CAR	WP	06	No	0	7/31/2013		NWP/CCP	9/29/2013	20 60
13-036	Watch	Incomplete Emergency Lift Inspection Forms	CAR	WP	01	No	0	7/31/2013		NWP/CCP	9/29/2013	55 6
13-037	Watch	Incomplete identification of work steps in procedures	CAR	WP	05	No	0	8/15/2013		INL AMWTP (Formerly IMEL)	10/14/2013	56 4
13-040	Watch	Corrective Action Management	CAR	CA	05	No	0	5/26/2013		CBFO Office of Site Operations	6/24/2013	0 -171
13-041	Watch	Proper investigation of events	CAR	SA	01	No	2	6/27/2013		NWP	0	-143
13-042	Watch	Lock Out Tag Out Procedures	CAR	SA	01	No	2	10/15/2013		NWP	4/30/2014	0 104
13-045	Watch	W001 100786 Inadequate	CAR	WP	01	No	1	8/20/2013	10/14/2013	NWP	9/20/2013	66 -24
13-046	Watch	H2S and AN2S inconsistent with higher level requirements; documents	CAR	DE	01	No	0	8/20/2013		NWPE	0	-89
13-047	Watch	Management / responsibility / listing in RI05 of AR records / documents	CAR	RM	05	No	1	7/18/2013		NWP/CCP	9/18/2013	42 10
13-048	Watch	Untrained Personnel WPP Fall Protection Training had expired	CAR	SA	04	No	1	8/6/2013		NWP	11/15/2013	85 16
13-050	Watch	Confined Space Training not completed	CAR	SA	04	No	1	8/6/2013		NWP	11/15/2013	89 12
13-051	Watch	H2S gasifier identification and documentation of items in waste	CAR	RM	05	No	1	8/12/2013		NWP/CCP	9/20/2013	46 0
13-054	Watch	Coordination of records destruction letters in records transmittal documents	CAR	BM	01	No	0	8/20/2013		NWP	11/1/2013	49 24
13-055	Watch	Inadequate Document Control	CAR	DC	01	No	1	9/6/2013		CBFO	12/30/2013	104 11
13-056	Watch	Inadequate Document Control	CAR	PS	01	No	0	9/6/2013		CBFO	0	-21
14-001	Watch	Lack of Training Evidence for Emergency Response Personnel	CAR	TQ	04	No	0	10/30/2013		NWP	3/28/2014	0 41
14-002	Watch	Incomplete Emergency Light Inspection Forms	CAR	WP	05	No	1	10/31/2013		NWP	4/6/2014	0 78
14-003	Watch	Waste shipment checklist (TSOP) discrepancy	CAR	WP	06	No	2	11/4/2013		NWP	7/31/2014	0 86
14-004	Watch	Hazardous waste shipment packages discrepancies	CAR	WP	06	No	2	11/4/2013		NWP	0	-13
14-005	Watch	Insufficient training on forms requirements	CAR	TR	07	No	0	11/24/2013		NWP	3/28/2014	49 45
14-006	Watch	Failure to appoint WAP required VEE	CAR	TQ	06	No	2	11/24/2013		NWP/CCP	12/16/2013	26 0
14-007	Watch	CCP Surveillance Personnel Authorization Card periods; re-evaluation	CAR	TQ	06	No	2	12/11/2013		NWP/CCP	1/21/2014	0 17
A-13-14	Watch	Misidentification of sealed containers greater than 4 liters	CDM/CDS	RT	06	No	1	8/2/2013		NWP/CCP	6/7/2013	0 0
A-13-21	Watch	Incorrect identification of waste category group	CDM/CDS	TR	06	No	0	7/9/2013		NWP/CCP	7/9/2013	0 0
A-13-24	Watch	Unassigned violation block line time on an NCR	CDM/CDS	CA	05	No	0	8/28/2013		ANL / CCP	8/28/2013	0 0
A-13-24	Watch	Completed rad surveys and rad ambient logging forms not available in records	CDM/CDS	RM	07	No	0	8/28/2013		ANL / CCP	8/28/2013	0 0
A-13-26	Watch	Internal review of procedure not completed	CDM/CDS	DC	06	No	0	9/22/2013		Carlsbad Field Office	8/22/2013	0 0
A-14-04	Watch	AR summary report issued with a missing figure	CDM/CDS	DC	05	No	0	11/13/2013		SRS / CCP	11/13/2013	0 0

Code	Activity
AE	Acceptable Knowledge (AK)
AA	Audits and Assessments
MT	Control of Measuring and Test Equipment (M&TE)
CA	Corrective Action Program (CAR) and NCRs
CD	Characterization Data
DE	Design Control and Engineering
DC	Document Control
GG	Gas Generation Testing (GGT)
DV	Data Validation
ND	Headspace Gas Sampling and Analysis (HGSA)
MA	Management
OR	Non-Destructive Assay (NDA)
OR	Organization and Resources
PD	Performance Demonstration Program (PDP)
PS	Procurement
QA	QA Program and Implementation
RT	Real-Time Radiology (RT)
RI	Recovery / Escrow / Isolation
RM	Records Management
SA	Safety Operations
ST	Sampling Techniques
SW	Software
TQ	Training and Qualifications
TR	Transportation
TL	TRAMPET: Leak Testing
VE	Visual Examination (VE)
WH	Waste Handling Operations
WP	Work Processes

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

Color Coding:  
 SCAD  
 Alert Level = Warning  
 Alert Level = Caution  
 Alert Level = On-Track

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<b>TREND CODES</b>	
<b>ACTIVITY CATEGORY</b>	<b>Code Number</b>
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

<b>TREND CODES</b>	
<b>DEFICIENCY CATEGORY</b>	<b>Code Number</b>
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