



Allen, Pam, NMENV

From: Kliphuis, Trais, NMENV
Sent: Monday, August 18, 2014 3:59 PM
To: Maestas, Ricardo, NMENV; Smith, Coleman, NMENV; Holmes, Steve, NMENV; Allen, Pam, NMENV
Subject: FW: July QA Audit of CBFO - 2-concerns
Attachments: CBFO concern 1 Final.pdf; CBFO concern 2 Final.pdf

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Sent: Wednesday, August 13, 2014 1:56 PM
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Cc: Navarrete, Martin - DOE; Miehls, Dennis - DOE; Harris, Alton; Stone, Nick; Peake, Tom; Kliphuis, Trais, NMENV; Lee, Raymond; Patrick Kelly; Kira Darlow
Subject: July QA Audit of CBFO - 2-concerns

The week of July 22, EPA conducted an audit of the CBFO QA program. Attached are the final versions of our QA Audit concern forms. The formal report will come at a later date.

Lindsey Bender

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**EPA INSPECTION ISSUE TRACKING FORM,
ISSUE NO. CBFO-QA-2014-01C ,**

Inspection No. QA-CBFO-2014-1	Issue Number: CBFO-QA-2014-01C Date: Draft-July 22, Final-Aug. 13, 2014
Inspector: Dorothy Gill, Lindsey Bender Attachments? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Sample Size: 1 Population size (if known): 1
<p>Description of Issue: The current CBFO organization chart dated 6/29/2014 lists 28 vacant Full Time Equivalent (FTEs) positions, including two new positions in the Office of Quality Assurance (OQA). These two new positions do not have official job descriptions or FTE authorizations and we were informed that they will not be filled until next fiscal year at the earliest.</p> <p>The presense of these two OQA positions on the CBFO organizational chart implies a greater level of organizational depth than is actually present at the current time. EPA requests that CBFO review and revise the organization chart to reflect only authorized positions whether filled or vacant.</p>	
B. Regulatory Reference: 40 CFR 194.22(e)	
C. NQA-1-1989 Element(s): 1	
D. Discussed with: Dana Bryson and Mike Brown	
E. Additional Comments: None	
<p>F. Site Response Information:</p> <p>Site Response Required? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Site Response Due Date:</p>	

**EPA INSPECTION ISSUE TRACKING FORM,
ISSUE NO. CBFO-QA-2014-02CR,**

Inspection No. QA-CBFO-2014-1	Issue Number: CBFO-QA-2014-02CR Date: Draft-July 22, Final-Aug. 13, 2014
Inspector: Dorothy Gill, Lindsey Bender Attachments? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Sample Size: 1 Population size (if known): 1
<p>Description of Issue: The 5/22/2013 CBFO organizational chart showed that the Office of Quality Assurance (OQA) had a direct reporting line to the Office of the Manager, which included the Deputy Manager and a secretary. In June 2013, EPA recommended that CBFO revise the organization chart to exclude the deputy, manager and secretary such that this reporting line only included the Manager. (See EPA Concern No. CBFO-QA-2013-01C).</p> <p>The 6/29/2014 organization chart for CBFO shows the OQA reporting to the Office of the Manager, which now includes a Senior Strategist, Legal Counsel, Waste Management STA, Nuclear Safety STA, and two secretaries in addition to the Manager and Deputy Manger.</p> <p>CBFO QA personnel stated that they do report directly to the CBFO Manager; however, EPA requests that CBFO consider changing the organization to clarify this important reporting relationship.</p>	
B. Regulatory Reference: 40 CFR 194.22(e)	
C. NQA-1-1989 Element(s): 1	
D. Discussed with: Dana Bryson and Mike Brown	
E. Additional Comments: None	
<p>F. Site Response Information:</p> <p>Site Response Required? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Site Response Due Date: August 29, 2014</p>	