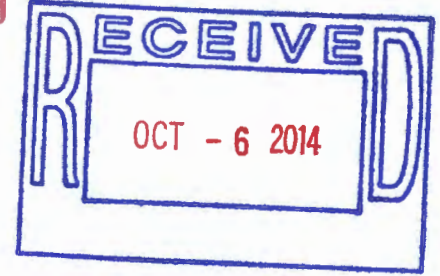




ENTERED

Department of Energy  
Carlsbad Field Office  
P.O. Box 3090  
Carlsbad, New Mexico 88221



OCT - 6 2014

To: Distribution

Subject: CBFO Semi-Annual CAR Trend Analysis Report for January 1 through June 30, 2014

The Carlsbad Field Office (CBFO) Corrective Action Report (CAR) Trend Analysis Report has been completed for the reporting period of January 1 through June 30, 2014. 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, the Waste Isolation Pilot Plant (WIPP) management and operating contractor, the Central Characterization Program, 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.

Count of CARs Closed Past Their Due Date Trend Chart	A slight increase in the number of CARs closed past their due date is noted and is attributed to personnel being displaced from or unable to access their normal work areas due to events at the WIPP site, and having their activities focused on recovery efforts.
Count of Repeat of Activity Codes – Pareto Chart <sup>1</sup> showing counts of activity codes	Two trend codes are selected for comment in this report. These two codes are reported significantly more times than others during the report period. The two Activity Category Trend Codes are Records Management (RM) and Work Processes (WP). They comprise 21% and 15% respectively of the total number of reported codes. Trend codes RM and WP were the trend codes with the highest percentage of occurrence, 29% and 20%, during the previous 6-month trend reporting period. Further efforts by the management review team might be in order to reinforce previously identified methods to reduce the numbers of CARs identified in these codes or to propose new actions and/or activities to generate improvement.



<p>CARs/CDAs that are currently open and/or were closed during the trend reporting period</p>	<p>Two CARs are selected for comment in this report. These two CARs have been open for the longest time as of this trend reporting period.</p> <p>CAR 13-041 appeared on the last 6-month summary report and has been open for 337 days. This CAR is a significant condition adverse to quality (SCAQ) issued by the Office of Site Operations to address procedure inadequacy. A revision to NWP procedure WP 04-CO.01-6 <i>Conduct of Operations Program – Investigation of Abnormal Events, Conditions and Trends</i> is required as part of the description of deficiency stated in the CAR to bring the procedure in line with requirements of DOE O 422.1 <i>Conduct of Operations</i> and WP 04-CO.01 <i>Conduct of Operations</i>. The corrective action plan states an expected date of completion of August 29, 2014. The corrective action plan is awaiting approval by CBFO.</p> <p>CAR 13-046 also appeared on the last 6-month summary report and has been open for 283 days. This CAR is a SCAQ issued by the Office of Site Operations to address procedure inadequacy. Revision to design sections of NWP document SDD H00 <i>Heating, Ventilation and Air Conditioning System, System Design Description (SDD)</i> are required as part of the description of deficiency stated in the CAR to bring the procedure in line with requirements of WP 09-10 <i>WIPP Preparation Guide for System Design Description Documents</i>, DOE-STD-3024-98 <i>Content of System Design Descriptions</i>, or DOE-STD-3024-2011 <i>Content of System Design Descriptions</i>. A revised corrective action plan has been received and is awaiting review and approval by CBFO.</p>
---	---


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.

Of note, the blank spaces under the Closed Column of the CARs/CDA Table represent currently open CARs. This data reflects the status of CARs as of the report cut-off date of June 30, 2014. Between that date and the date of this trend report, the following CARs have been closed.

CAR Number	Date Closed
14-025	08/07/2014
14-033	08/14/2014
14-044	08/26/2014
14-046	08/20/2014
14-048	09/05/2014
14-049	09/05/2014
14-050	09/05/2014

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 Quality Assurance Division.

Sincerely,



Michael R. Brown, Director  
Quality Assurance Division

cc: w/attachment

J. Franco, CBFO	*ED
D. Bryson, CBFO	ED
R. Nelson, CBFO	ED
J. R. Stroble, CBFO	ED
D. Gadbury, CBFO	ED
G. Basabilvazo, CBFO	ED
B. Mackie, CBFO	ED
D. Miehl, CBFO	ED
M. Navarrete, CBFO	ED
B. Roberts, DOE-ID	ED
D. Haar, AMWTP	ED
G. Byram, AMWTP	ED
G. Tedford, AMWTP	ED
R. McQuinn, NWP	ED
J. Blankenhorn, NWP	ED
J. Harris, NWP	ED
F. Sharif, NWP/CCP	ED
E. Gulbransen, NWP/CCP	ED
W. Ledford, NWP/CCP	ED
V. Cannon, NWP/CCP	ED
J. Hoff, NWP/QA	ED
B. Allen, NWP/QA	ED
S. Punchios, NWP/QA	ED
S. Escareno-Soto, NWP/QA	ED
P. Shoemaker, SNL/CPG	ED
E. Safley, SNL/CPG	ED
N. Elkins, LANL/CO	ED
C. Stroud, LANL/CO	ED
L. Smith, LANL/CO	ED
T. Peake, EPA	ED
L. Bender, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
S. Ghose, EPA	ED
R. Lee, EPA	ED
J. Kieling, NMED	ED
S. Holmes, NMED	ED
R. Maestas, NMED	ED
C. Smith, NMED	ED
V. Daub, CTAC	ED
R. Allen, CTAC	ED
B. Pace, CTAC	ED
P. Martinez, CTAC	ED
J. Schuetz, CTAC	ED
P. Hinojos, CTAC	ED
D. Sellmer, CTAC	ED
G. White, CTAC	ED

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution



# 6-Month Trend Report for January through June of 2014



CARs/CDA that are Open and/or Closed between January and June of 2014

These data are calculated values based on report cut-off date of 7/29/2014

Activity #	Alert Level	Title	Responsible Organization	Open	Closed	Due Date	Each Time	Days To Due Date					
13-140		Corrective Action Management	CSO	CA	CA	05	No	1	5/30/2013				
13-041		Process Investigation of Events	NWFP	CAR	SA	01	No	0	6/27/2013				
13-046		HWD and HWS increased with higher level requirements documents	NWFE	CAR	DE	01	No	0	8/20/2013				
14-007	Watch	ECP Surveillance Personnel Authorization Card periodic re-evaluations	CCPNWP	CAR	TQ	06	No	1	12/12/2013				
14-008		The NMMP does not address interfaces with required documents	NMPPM	CAR	MA	01	No	0	4/16/2014				
14-009		Use of obsolete AK Summary	CCPNWP	CAR	DC	05	No	0	1/23/2014				
14-010		Barcode Storage	NWFP	CAR	WP	08	No	0	1/20/2014				
14-011		ECP IGC Database Issues	CCPNWP	CAR	MT	06	No	0	1/20/2014				
14-012		ECP Out of Tolerance Issues	CCPNWP	CAR	MT	05	No	0	1/20/2014				
14-013		ECP Calibration Suppliers Issues	CCPNWP	CAR	MT	06	No	0	1/20/2014				
14-014		Maintenance Work Order Issues	NWFP	CAR	RM	05	No	0	1/20/2014				
14-015		Out of Tolerance Justification	NWFP	CAR	MT	05	No	0	1/20/2014				
14-016		CA Extension Justification Issue	NWFP	CAR	MT	05	No	0	1/20/2014				
14-017	Watch	M&TE Incomplete Records Issue	CCPNWP	CAR	RM	06	No	2	1/20/2014	5/29/2014	5/16/2014	88	13
14-018		Calibration Supplier CRN Issue	NWFP	CAR	MT	05	No	1	1/20/2014		8/13/2014	0	15
14-019	Watch	NWFP Approval Issue	NWFP	CAR	WP	05	No	1	1/20/2014		5/25/2014	70	14
14-020		Out of Tolerance Justification	NWFP	CAR	MT	05	No	2	1/20/2014		8/1/2014	0	99
14-021		Procedure requires physical signature	NWFP	CAR	TQ	04	No	0	2/26/2014		4/15/2014	55	3
14-022		Industry-standard RCA course documentation not on file	NWFP	CAR	CA	01	No	0	2/26/2014		4/23/2014	55	1
14-023		Categorization of OPRS reports	CSG	CAR	WP	01	No	0	3/6/2014		8/13/2014	0	25
14-024		Read and Sign Training not completed in the allotted time specified	IC	CAR	TQ	05	No	0	3/12/2014		5/20/2014	71	8
14-025	Watch	S&OP Process for review/approval of contractor Safety/Health Programs	CS&H	CAR	MA	05	No	0	4/2/2014		7/21/2014	0	2
14-026		TIMELINESS OF PISA DECONTAMINATION	NWFO	CAR	WP	05	No	0	4/1/2014		8/12/2014	0	45
14-027	Watch	Engage Individuals Designation	NWFP	CAR	PS	01	No	0	4/4/2014		7/31/2014	0	2
14-028		Graded Approach inconsistencies	NWFP	CAR	PS	05	No	0	4/4/2014		8/29/2014	0	58
14-029		M&D Revision - New M&D	NWFP	CAR	PS	05	No	0	4/4/2014		4/13/2014	67	1
14-030	Watch	Documentation of CAR appointments letters	CCPNWP	CAR	TQ	08	No	2	4/7/2014		5/30/2014	45	8
14-031		Secure File transfer Protocol not up to date for Software	CCPNWP	CAR	SW	01	No	0	4/7/2014		6/1/2014	57	0
14-032		PD not compliant with scope of work for calibration standards	NWFP	CAR	PS	05	No	0	4/7/2014		7/30/2014	112	18
14-033		Lack of required reading	NWFP	CAR	PS	04	No	0	4/7/2014		8/1/2014	0	19
14-034		Training Program documentation	CCPNWP	CAR	DC	08	No	0	4/7/2014		6/14/2014	44	14
14-035		Performance of implementing procedures	CCPNWP	CAR	WP	01	No	0	4/7/2014		8/6/2014	12	28
14-036	Watch	Receipt of QA records	CCPNWP	CAR	RM	05	No	1	4/7/2014	5/28/2014	5/16/2014	51	12
14-038		Documentation for ECD #13395 not accurately completed.	NWFP	CAR	DE	05	No	0	4/16/2014		9/30/2014	0	63
14-039		Engineering Change Order lacking required design verification	NWFP	CAR	DE	06	No	0	3/7/2014		9/30/2014	0	23
14-040	Watch	Onsite M&D not meeting SOW requirements	NWFP	CAR	PS	08	No	1	5/23/2014		9/30/2014	0	63
14-041		ICR for "S&E" services used in Calculation SAs Rtr as	CCPNWP	CAR	SW	05	No	0	5/25/2014		10/9/2014	0	69
14-042		Revise CCP-124 to address SDR for Software used in Calculations	CCPNWP	CAR	SW	01	No	0	5/25/2014		10/6/2014	0	69
14-044		W&H personnel lacking required indoctrination/reading Health&Safety Plan	CI	CAR	TQ	04	No	0	6/26/2014		8/20/2014	0	22
14-045	Watch	Use of obsolete AK Summary revision during RTR operations	CI	CAR	RT	05	No	0	6/26/2014		8/6/2014	0	8
14-047		Incomplete documentation recorded on CCP TP 003, AK 1 for AK Summary	CI	CAR	AK	06	No	0	6/26/2014		9/24/2014	0	57
14-048		Wrong Calculation	IC	CAR	DC	01	No	0	6/27/2014		8/26/2014	0	31
14-049		Missing Data Evidence	IC	CAR	DC	01	No	0	6/27/2014		8/26/2014	0	31
14-050		Inadequate Record of Revision	IC	CAR	DC	02	No	0	6/27/2014		8/26/2014	0	31
A-14-03		Lack of identification of layers of confinement on RTR data sheets	CO	CDA/CDS	RM	05	No	0	1/15/2014		1/15/2014	0	0
A-14-03		Errors on VE BOMs and lack of proper correction of items on BDR records	CU	CDA/CDS	RT	06	No	0	1/16/2014		1/16/2014	0	0
A-14-07		Identification and tagging of records in storage file cabinets	NWFP	CDA/CDS	MT	05	No	0	1/28/2014		1/28/2014	0	0
A-14-07		Lack of proper labeling / tagging of items in QA warehouse storage	NWFP	CDA/CDS	CR	05	No	0	1/28/2014		1/28/2014	0	0
A-14-08		Errors on Chain of custody documents	SL	CDA/CDS	RM	05	No	0	1/27/2014		2/27/2014	0	0
A-14-08		Attaching incorrect software test documents to records packages	SL	CDA/CDS	WP	06	No	0	2/25/2014		2/25/2014	0	0
A-14-18		Inconsistencies between AK source documents	CI	CDA/CDS	AK	08	No	0	6/12/2014		6/12/2014	0	0
S-14-14		Failure to perform review/comment on RIDS documents prior to the expiration of the current version	NWFP	CDA/CDS	RM	05	No	0	3/31/2014		3/31/2014	0	0
S-14-20		Editorial and content errors on calculation forms	CS	CDA/CDS	SW	08	No	0	5/19/2014		5/19/2014	0	0
S-14-20		Omissions of procedure steps and content in calculations	CS	CDA/CDS	SW	05	No	0	5/19/2014		7/2/2014	0	0

Code	Activity
AK	Acceptable Knowledge (AK)
AA	Audits and Assessments
MT	Control of Measuring and Test Equipment (M&TE)
CA	Corrective Action Program (CAPs and NCAs)
CD	Characterization Data
DV	Date Validation
DE	Design Control and Engineering
DC	Document Control
GG	Gas Generation Testing (GGT)
HG	Headspace Gas Sampling and Analysis (HGSA)
MA	Management
MD	Non-Destructive Assay (NDA)
OR	Organization and Resources
PD	Performance Demonstration Program (PDP)
PS	Procurement
QA	QA Program and Implementation
RT	Real-Time Radiography (RTR)
R	Receiving / Receipt Inspection
RM	Records Management
SA	Safety Operations
ST	Sampling Techniques
SW	Software
TQ	Training and Qualifications
TR	Transportation
T	TRIPACT 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	Record Processing

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

Prepared by: *Jan R. Schultz* 9/16/14  
 CTAC QA Specialist  
 Approved by: *Michael R. B.* 9/30/2014  
 CEO QA Approval

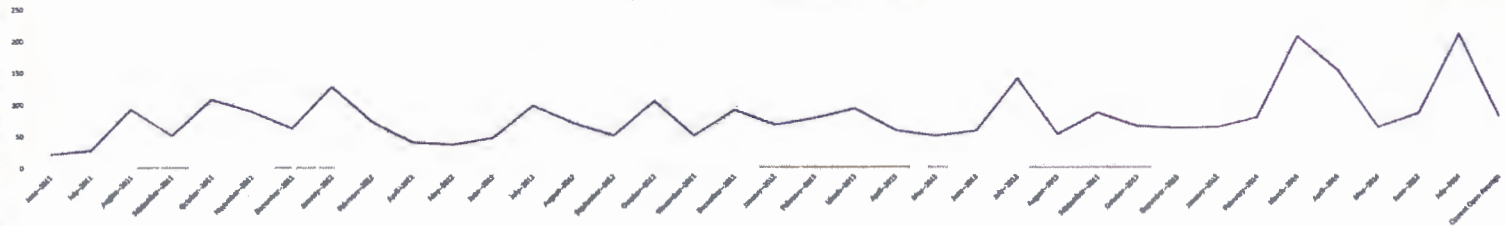


# 6-Month Trend Report for January through June of 2014

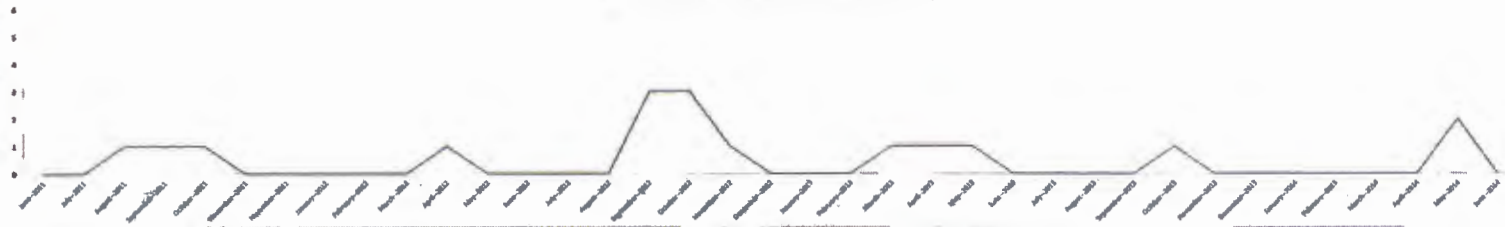


CAR Cycle Time By Activity Code			
Activity	Min	Avg	Max
AK	0	3	33
AA	53	122	161
MT	0	96	159
CA	0	92	425
CD	62	62	92
DV	0	24	54
DE	0	133	343
DC	0	55	167
GG	0	0	0
HG	0	30	50
MA	30	114	326
ND	0	0	0
OR	0	176	524
PD	0	0	0
PS	41	105	206
QA	6	49	77
RT	0	16	43
RI	0	0	0
RM	0	49	130
SA	56	188	397
ST	0	0	0
SW	0	30	61
TQ	0	41	100
TR	0	24	91
TL	0	0	0
VE	0	0	0
WH	0	0	0
WP	0	67	162

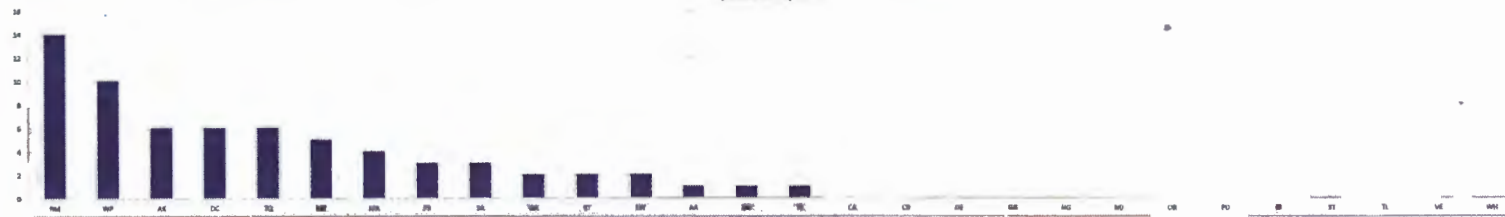
Average Number of Days CARs are Open (Per Month Over 36 Months)



Count of CARs Closed Past Their Due Date (Per Month Over 36 Months)



Repeated Activity Codes



Count of OPEN Past Due CARs (Per Month Over 36 Months)

