DATE: JAN 2 0 2016
REPLY TO ATTN OF: CBFO:OQA:MPN:BA:16-1227:UFC 2300.00
SUBJECT: Evaluation of the CAP for CBFO CAR 16-007 Resulting from CBFO Audit A-16-01
TO: Mr. Benjamine Roberts, DOE-ID

Attached are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 16-007. As documented on the enclosed CAR Continuation Sheets, the evaluation indicates that the CAP does not provide adequate measures to address and reduce the likelihood of the condition noted in the CAR. Please reevaluate your responses and provide additional information, as appropriate, in your second revised CAP for CAR 16-007 by February 8, 2016.

If you have any questions or comments concerning the evaluation, please contact me at (575) 234-7483.

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment

cc: w/attachment
M. Brown, CBFO
J.R. Strobble, CBFO
D. Miehls, CBFO
N. Castaneda, CBFO
G. Birge, CBFO
T. Carver, CBFO
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C. Castillo, CTAC
H. Kirschenmann, CTAC
P. Hinojos, CTAC
G. White, CTAC
Site Documents
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution
CAR CONTINUATION SHEET

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<tr>
<td><strong>Block #12</strong> Acceptance of Proposed Corrective Actions:</td>
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<td>An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 16-007. The CAP was submitted via Idaho Treatment Group (ITG) letter C-2016-0009, dated January 7, 2016, from Mr. David J. Richardson, President and AMWTP Manager, ITG, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance.</td>
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<td>Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.</td>
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**REMEDIAL ACTIONS**

*No remedial actions required.*

**Evaluation:**

The response "no remedial actions required" is contrary to the required response to address remedial action in accordance with CAR, block 12.

**INVESTIGATIVE ACTIONS**

*No investigative actions required.*

**Evaluation:**

The response "no investigative actions required" is contrary to the required response to address remedial action in accordance with CAR, block 12.

**ROOT CAUSE DETERMINATION**

CAR 16-007 did not require a root cause determination.

**Evaluation:**

Not applicable.

**ACTIONS TO PRECLUDE RECURRENCE**

Due Date: 02-29-2016*

1. MP-Q&SI-5.6, Graded Approach, was under revision at time of audit. DCR 21162 will be revised to include "the importance of the data to be generated" and "the consequence of failure" in MP-Q&SI-5.6.

*This document is on AMWTP's WIPP Procedure List and will require review/concurrence by DOE-ID and then formal review/approval by CBFO prior to closure of this CAR.
**CAR CONTINUATION SHEET**

|-------------------|-------------------------|---------------|

**Evaluation:**

The proposed action to preclude recurrence may be appropriate. However, since there has not been any remedial and investigative actions performed by AMWTP as required by Block 12 of the CAR, there remain questions related to negative consequences of the adequacy of the AMWTP QA Program such as extent of condition, and cause for the condition cited in CAR 16-007. Completion of these actions may impact the proposed action to preclude recurrence.

**REJECTION**

The results of the CAP evaluation identified that the investigative and remedial actions have not been performed as required by Block 12 of the CAR. For this reason, the CAP for CAR 16-007 is rejected. Any indication resulting from the investigative and remedial actions suggesting that further corrective action may be needed should be addressed in the actions to preclude recurrence portion of the revised CAP.

Evaluated by: Harley Kirschenmann, CTAC Auditor  
Date: 1/19/2016