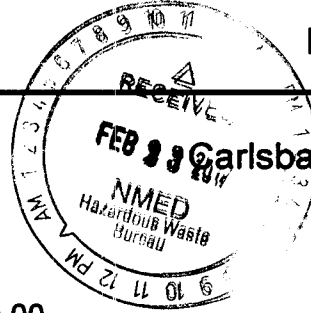


United States Government

**ENTERED**

Department of Energy

memorandumCarlsbad Field Office
Carlsbad, New Mexico 88221

DATE: FEB 23 2017
REPLY TO
ATTN OF: CBFO:OQA:MPN:BA:17-1051:UFC 2300.00

SUBJECT: Evaluation of the Proposed CAP for CBFO CAR 17-009 Resulting from Audit A-17-04

TO: Mr. James Malmo, DOE-ID

The Carlsbad Field Office (CBFO) has evaluated the Corrective Action Plan (CAP) provided by the Waste Disposition Division for Corrective Action Report (CAR) 17-009, which resulted from Audit A-17-04 of the Advanced Mixed Waste Treatment Project. The results of the evaluation are provided in the attached CAR Continuation Sheet.

The results of the evaluation indicate that the CAP for CAR 17-009 does not provide adequate measures to address the impact/extent and reduce the likelihood of recurrence for the condition noted in the CAR. Therefore, the CAP has been rejected. Please revise and resubmit the CAP for CAR 17-009 by March 13, 2017.

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

Martin P. Navarrete

Senior Quality Assurance Specialist

Attachment

170219



Mr. James Malmo

-2-

FEB 23 2017

cc: w/attachment

S. Ross, EM-3.113	*ED
J. Carswell, CBFO	ED
M. Brown, CBFO	ED
J.R. Stroble, CBFO	ED
D. Miehl, CBFO	ED
M. Fineran, CBFO	ED
M. Stapleton, CBFO	ED
N. Castaneda, CBFO	ED
G. Birge, CBFO	ED
J. Zimmerman, DOE-ID	ED
J. Van Vliet, DOE-ID	ED
D. Pruitt, DOE-ID	ED
G. Byram, AMWTP	ED
E. Dumas, AMWTP	ED
J. Floerke, AMWTP	ED
A. Morse, AMWTP	ED
G. Tedford, AMWTP	ED
B. Jensen, AMWTP	ED
L. Peterson, AMWTP	ED
J. Walsh, EPA	ED
J. Ellis, EPA	ED
T. Peake, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
V. Daub, CTAC	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
M. Lerach, CTAC	ED
G. Knox, CTAC	ED
J. Fernandez, CTAC	ED
R. Bradford, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
Site Documents	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 17-009

2. Activity No: A-17-04

3. Page 1 of 2

Block 15 Acceptance of Proposed Corrective Actions

An evaluation was performed of the Corrective Action Plan (CAP) developed to address the Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-009. The CAP was submitted via U.S. Department of Energy, Idaho Operations Office memorandum (WDP-AMWTP-17-002), dated January 19, 2017, from Mr. James A. Malmo, Assistant Manager, Waste Disposition Division, to Mr. Martin P. Navarrete, Carlsbad Field Office.

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.

Remedial and Investigative Actions:

MP-COPS-9.9 has been superseded by MCP-2980.

In discussions with operator, abnormal conditions are reported to the Shift Supervisor (SS) when they are discovered. Documentation of the notification by the operator and follow up review of the logs by the SS for accuracy of log entries (including identifying the who, what, why, where, and when) needs to be improved across the AMWTP.

Operator did not perform log entries and make correct notifications to management as required corresponding to A3BIC03 Incorrect Performance Due to Mental Lapse with contributing cause of A3BIC01 Check of Work LTA due to Shift Supervisors are not identifying log keeping errors during required reviews of shift logs.

Action(s) to Preclude Recurrence:

AI 106852 - Perform TG training for Operators and Supervisors to include:

- The log keeping deficiencies identified during the CBFO audit,*
- Provide examples of good log entries regarding abnormal events,*
- Have operators/supervisors practice generating log entries for a simulated abnormal event (practice entries should be on paper, not in eSOMS),*
- Present SS's a set of logs to review and have them identify any deficiencies with the logs.*

AI 106853 - Perform MAR 106496 Assess Log Keeping per MCP-2980. Scope of the assessment is to include log keeping in all AMWTP areas including content and timeliness of entries, documentation of off normal events, notifications, and follow up actions.

AI 106854 - Generate additional targeted corrective actions based on the results of MAR 106496.

Scheduled Completion Date: 04/09/2017

CAR CONTINUATION SHEET

1. CAR No: 17-009	2. Activity No: A-17-04	3. Page 2 of 2
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Evaluation:

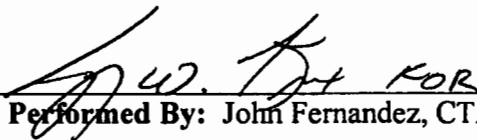
The remedial actions described above are sufficient to address the conditions adverse to quality. The CAP provides remedial actions for the item listed. The investigative actions described above are insufficient to address the conditions adverse to quality identified in the CAR. The CAP investigative actions do not appear to go beyond, or list anything past the original sample size; if more than the sample size was reviewed, this needs to be stated in the CAP. In the CAP, no impact of conditions and/or extent of conditions are listed, and a warranting investigation into the degree of extent/impact of these conditions shall occur. If the investigation into extent/impact of conditions has occurred, then this information needs to be included into the CAP.

The CAP needs to include the following:

- Extent of conditions
- Impact of conditions
- Log-keeping documents reviewed, along with number of documents reviewed

Acceptance:

The results of the evaluation of the CAP indicate that the investigative actions and extent/impact are insufficient to address conditions adverse to quality documented in the CAR. Therefore, it is recommended that the CAP for CAR 17-009 be rejected.


Evaluation Performed By: John Fernandez, CTAC

16 FEB 2017
Date