To: Mr. James Malmo, DOE-ID

The Carlsbad Field Office (CBFO) has evaluated the revised Corrective Action Plan (CAP) for Corrective Action Report (CAR) 17-009 resulting from Audit A-17-04 of the Advanced Mixed Waste Treatment Project (AMWTP). The CAP and revised CAP were submitted via Idaho Operations Office Memorandum WDP-AMWTP-17-002, dated January 19, 2017 and WDP-AMWTP-17-007, dated March 13, 2017. The results of the evaluation are provided in the attached CAR Continuation Sheet.

The results of the evaluation indicate that the combined CAPs for CAR 17-009 provide adequate measures to address the remedial actions, investigative actions, and actions to preclude recurrence for the condition noted in the CAR. The revised CAP is therefore accepted.

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

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment
Block 15. Acceptance of Proposed Corrective Actions

An evaluation was performed of the Corrective Action Plan (CAP) and the revised CAP developed to address the Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-009. The CAP and revised CAP were submitted via U.S. Department of Energy, Idaho Operations Office memorandums (WDP-AMWTP-17-002), dated January 19th, 2017 and (WDP-AMWTP-17-007), dated March 13, 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 and revised CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

**Remedial and Investigative Actions: Actionee:** Brian Warner

MP-COPS-9.9 has been superseded by MCP-2980.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 A3BICO3 Incorrect Performance Due to Mental Lapse with contributing cause of A3BICOI Check of Work LTA due to Shift Supervisors are not identifying log keeping errors during required reviews of shift logs.

**Investigative/Extent of Condition Review:**

MAR I 06496 was completed for review of eSOMs log in all AMWTP areas for content, timeliness of entries, documentation of off normal systems events, notifications, and follow-up actions per MCP-2980, Log Keeping and MCP-4056, Supplemental Directions Associated with AMWTP Operations. Log reviews covered four operating days including backshift and weekend crews.

During the review, some log entries were identified where additional detail could have been included. The log entries were updated; however, detail needed when logging of abnormal events is subjective by nature.

The assessment determined that the comprehensive tailgate, identified in CA I 06852, should be completed by identified personnel. This action would be followed up with monitoring of eSOMs using the management observation program.

**Revised Action to Preclude Recurrence:**

AI I 06852 - Perform tailgate 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 (note: practice entries should be on paper, not in eSOMS),
- Present Shift Supervisors a set of logs to review and have them identify any deficiencies with the logs.
CAR CONTINUATION SHEET

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AI I06853 - MAR I06496 was completed and it was determined that completion of the comprehensive tailgate training identified in AI I06852 and follow up monitoring using management observations will reduce the likelihood of recurrence.

AI I06854 - MAR I06496 was completed and it was determined that completion of the comprehensive tailgate training identified in AI I06852 and follow up monitoring using management observations will reduce the likelihood of recurrence. No additional audience for completion of the tailgate was identified over and above the audience identified in AI I06852.

**Scheduled Completion Date:** 04/09/2017

**Evaluation:**

The remedial actions described above are sufficient and are referenced in the Corrective Action Plan (WDP-AMWTP-17-002) dated January 19th, 2017 to address the conditions adverse to quality. The revised CAP (WDP-AMWTP-17-007) dated March 13th, 2017 address investigative actions, appear to go beyond and list shifts past the original sample size. In the revised CAP, an impact of conditions and/or extent of conditions are listed; additional log entries were reviewed, noted, required updating and corrected. The investigative actions described above are sufficient to address the conditions adverse to quality identified in the CAR. No Causal Analysis was needed for this CAR. The actions to preclude occurrence described above are sufficient and are referenced in the revised CAP.

**Acceptance:**

The results of the evaluation of the CAP (WDP-AMWTP-17-002) and the revised CAP (WDP-AMWTP-17-007) indicate that the remedial, investigative actions and extent/impact are sufficient to address conditions adverse to quality documented in the CAR. Therefore, it is recommended that the CAP and revised CAP for CAR 17-009 be accepted.

**Evaluation Performed By:** John Fernandez, CTAC

**Date:** 3.22.17