



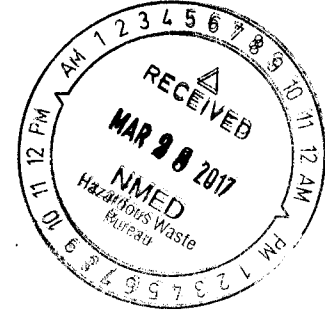
United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: MAR 28 2017
 REPLY TO ATTN OF: CBFO:OQA:MPN:BA:17-1100:UFC 2300.00
 SUBJECT: Evaluation of the Revised CAPs for CBFO CARs 17-007 and 17-010
 TO: Mr. James Malmo, DOE-ID



The Carlsbad Field Office (CBFO) has evaluated the revised Corrective Action Plans (CAPs) provided by the Waste Disposition Division for Corrective Action Reports (CARs) 17-007 and 17-010, which resulted from Audit A-17-04 of the Advanced Mixed Waste Treatment Project. The results of the evaluations are provided in the attached CAR Continuation Sheets.

The results of the evaluations indicate that the remedial actions, investigative actions, and proposed actions to preclude recurrence satisfactorily address the conditions adverse to quality documented in CARs 17-007 and 17-010 and provide adequate measures to prevent recurrence. Therefore, the revised CAPs for CARs 17-007 and 17-010 are approved.

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

Martin P. Navarrete
 Martin P. Navarrete
 Senior Quality Assurance Specialist

Attachment

cc: w/attachment			
S. Ross, EM-3.113	*ED	J. Walsh, EPA	ED
M. Brown, CBFO	ED	J. Ellis, EPA	ED
J.R. Stroble, CBFO	ED	T. Peake, EPA	ED
D. Miehl, CBFO	ED	E. Feltcorn, EPA	ED
M. Fineran, CBFO	ED	R. Joglekar, EPA	ED
M. Stapleton, CBFO	ED	J. Kieling, NMED	ED
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D. Pruitt, DOE-ID	ED	G. Knox, CTAC	ED
G. Byram, AMWTP	ED	K. Hood, CTAC	ED
E. Dumas, AMWTP	ED	P. Hinojos, CTAC	ED
B. Jensen, AMWTP	ED	G. White, CTAC	ED
L. Peterson, AMWTP	ED	Site Documents	ED
J. Floerke, AMWTP	ED	CBFO QA File	
A. Morse, AMWTP	ED	CBFO M&RC	
G. Tedford, AMWTP	ED	*ED denotes electronic distribution	

170320



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Block #15 Acceptance of Proposed Corrective Actions

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-007. The revised CAP was submitted via U.S. Department of Energy, Idaho Operations Office memorandum (WDP-AMWTP-17-006), dated March 2, 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 revised CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation. Items revised as a result of the initial CAP rejection are identified in bold font.

Remedial and Investigative Actions:

CAR incorrectly identifies OCR 21778 as 21776.

A. Remedial Actions:

- a. *DCR's identified with missing reviews were corrected 12/14/2016 and will be included with the objective evidence in the final closure package.*
- b. *An email was sent to AMWTP technical writing staff 12/13/2016 describing issues found and implementing an interim corrective action to copy the applicable required reviewer list from MP-DOCS-18.4 and include it in the DCR case file and use it to quality check the case file and ensure correct review of the document.*
- c. *Hired two additional technical writers (experienced with AMWTP/WIPP document process) 12/12/2016 and 2/6/2017*

B. Investigative Actions:

- a. *A review of all case files for WIPP documents revised between December 1, 2015 and December 15, 2016 was performed to determine the extent of conditions.*
 - *3.9% of revised WIPP documents were found to have incomplete reviews performed (including the two identified during the audit).*
- b. *To determine the effectiveness of remedial actions performed, an additional review of all case files for WIPP documents revised after December 9, 2016 (prior to 3/1/2017) was performed. 100% of these case files indicate full reviews were completed.*

C. During the time-frame these DCRs were produced a number of contributing factors appear to be relative:

- *Retirement of technical writer on Oct. 27, 2016, replacement acquired Dec. 12, 2016 (insufficient trained staff).*
- *Medical leave of technical writer in November, return Jan. 9, 2017 (insufficient trained staff).*
- *Part time technical writing support brought in to cover hadn't used DCR process for 6 months (insufficient trained staff).*
- *Abnormal number of WIPP document changes made due to contract consolidation, WIPP WAC 8 revision, integration of two QA programs into one, ISMS activities, and numbering changes (change/competing priorities).*

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- *Staff implementing different change process for all non-WIPP AMWTP documents, (change/competing priorities).*

Evaluation:

The remedial and investigative actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

Causal Analysis:

Not required for this CAR.

Action(s) to Preclude Recurrence:

D. Management Assessment:

- *Action Item 106971-Complete an assessment of all WIPP document DCR case files prepared between December 1, 2015 and December 9, 2016, documenting all errors identified*
- *Action Item 106973-Correct identified errors*
- *Action Item 106974-Issue assessment report*
- *Action Item 106975-Determine if follow on corrective actions are required*

E. Staffing issues have been resolved (no further action).

F. Current staff has been made aware of the issues and are involved in the corrective actions (lessons learned, no further action).

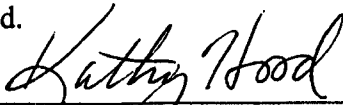
Scheduled Completion Date: 03/28/2017

Evaluation:

The proposed corrective actions are deemed appropriate to address the condition adverse to quality documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE

The results of the evaluation of the revised CAP indicate that the remedial actions, investigative actions, and proposed corrective actions to preclude recurrence satisfactorily address the condition adverse to quality documented in in the CAR. Therefore, it is recommended that the revised CAP for CAR 17-007 be approved.



Evaluation Performed By: Kathy Hood, CTAC

3-27-17

Date

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Block #15 Acceptance of Proposed Corrective Actions

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-010. The revised CAP was submitted via U.S. Department of Energy, Idaho Operations Office memorandum (WDP-AMWTP-17-006), dated March 2, 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 revised CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation. Items revised as a result of the initial CAP rejection are identified in bold font.

Remedial and Investigative Actions:

A. Remedial Actions:

- a. *Items 1-8; Applicable documents were corrected and provided to Kathy Hood (audit team).*
- b. *Management notified*

B. Investigative Actions:

- a. *Items 1-8 - During the time-frame these DCRs were produced a number of contributing factors appear to be relative. To determine if the missed reviews are related to the above issues and/or limited to the DCRs identified a management assessment of all WIPP document DCRs prepared between December 1, 2015 and December 9, 2016 will need to be performed. Potential contributing factors:*
 - *Retirement of technical writer on Oct. 27, 2016, replacement acquired Dec. 12, 2016 (insufficient trained staff).*
 - *Medial [sic] leave of technical writer in November, return Jan. 9, 2017 (insufficient trained staff).*
 - *Part time technical writing support brought in to cover hadn't used DCR process for 6 months (insufficient trained staff).*
 - *Abnormal number of WIPP document changes made due to contract consolidation, WIPP WAC 8 revision, ISMS activities, and numbering changes (change/competing priorities).*
 - *Staff implementing different change process for all non-WIPP AMWTP documents, (change/competing priorities).*
- b. *Item 9 - Qualification cards for QCVVE001 were reviewed to ensure completeness and accuracy. No additional issues were identified for corrective action. Action Item 107032 has been initiated for correction of incomplete date for Line Manager Approval for identified qualification card. Issue verified, isolated instance (no further EOC actions required).*
- c. *Items 10 & 11 - Twenty qualifications and checklists were reviewed for reference to MP-TRUW-8.1 with all twenty needing revision to identify new procedure number. There is no impact from this condition as the Fluor Idaho document management system (EDMS) directs the user to the current effective document if a document has been changed or superseded as a result of the consolidation of the two previous contractor programs. Remedial action: Twenty qualifications and checklists are currently under revision to correct identified procedure. Seven have been completed; three pending final review and 10 are in process of update.*

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d. Items 12 – 17 - Issues verified, isolated instances (no further EOC actions required).

Evaluation:

The remedial and investigative actions described above are deemed appropriate to address the conditions adverse to quality identified in the CAR.

CAUSAL ANALYSIS

a. Level A Cause Code:

- *A4 – Management Problem*
- *B2 – Change Management LTA*
- *C13 – Accuracy/Effectiveness of Change Not Verified/Validated*

b. Contributing Cause A

- *A3 – Human Performance LTA*
- *B2 – Rule Based Error*
- *C03 – Too Much Activity Occurring, Problem Solving Error Made*

c. Items 1-8 - During the time-frame these DCRs were produced a number of contributing factors appear to be relative:

- *Retirement of technical writer on Oct. 27, 2016, replacement acquired Dec. 12, 2016 (insufficient trained staff).*
- *Medial [sic] leave of technical writer in November, return Jan. 9, 2017 (insufficient trained staff).*
- *Part time technical writing support brought in to cover hadn't used DCR process for 6 months (insufficient trained staff).*
- *Abnormal number of WIPP document changes made due to contract consolidation, WIPP WAC 8 revision, ISMS activities, and numbering changes (change/competing priorities).*
- *Staff implementing different change process for all non-WIPP AMWTP documents, (change/competing priorities).*

d. Item 9 - Date incorrectly documented, isolated instance, Document will be corrected (human error).

e. Items 10-11 - ICP Core EDMS corrects for superseded document callout if user attempts to use document, referring user to correct document. Remedial action: Twenty qualifications and checklists are currently under revision to correct identified procedure. Seven have been completed; three pending final review and 10 are in process of update via corrective action 108269.

f. Item 12 - Nonconformance Report (NCR) 102031 had the Unreviewed Safety Question (USQ) screening required marked as YES. The adjacent block to record the USQ Determination numbers was left blank. There were two USQ Determinations (USQDs) associated with the NCR - USQD 102057 and USQD 102065. There were two Facility Modification Proposals (FMPs) associated with work to resolve NCR 102031 - FMP-1527 and FMP-1530. Revision 02 of both FMPs identified the USQD as 102031. This is the NCR number rather than the USQD. The correct USQD was not identified on the FMPs. Neither FMP-1527 Rev. 02, nor FMP-1530 identified USQD 102065. NCR 102031 was for the North/South Box Line Quad Lift Roller Conveyor

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upgrade and was for an incorrectly vendor supplied component (PO 16-522) that required the FMP in-plant modifications. Verify MCP-538 required when USQ is selected "Yes".

- g. Item 13 - ICP Core EDMS corrects for superseded document callout if user attempts to use document, referring user to correct document. Remedial action - FWD-7 is in revision under Document Revision Form 353211 which will update the references to current document numbers.*
- h. Item 14 - Inattention to detail when document was released. Document will be corrected.*
- i. Item 15 - ICP Core EDMS corrects for superseded document callout if user attempts to use document, referring user to correct document. TPR-7997 is in revision under Document Revision Form 14862, via Corrective Action 108266, which will update the references to current document numbers.*
- j. Item 16 & 17 - Inattention to detail when documents were developed, reviewed, and released. Documents will be corrected.*

Evaluation:

The causal analyses are deemed appropriate in determining the factors that contributed to the CAR conditions.

ACTIONS TO PRECLUDE RECURRENCE

Items 1-8 - Management Assessment:

- *AI 106998-Complete a management assessment of all WIPP document DCR case files prepared between December 1, 2015 and December 9, 2016, documenting all errors identified*
- *AI 107008-Correct identified errors*
- *AI 107009-Issue assessment report*
- *AI 107010-Determine if follow on corrective actions are required*
- *Staffing issues have been resolved (no further action).*
- *Current staff has been made aware of the issues and are involved in the corrective actions (lessons learned, no further action).*

Item 9 - Revised: Qualification cards for QCVVE001 were reviewed to ensure completeness and accuracy. No additional issues were identified for corrective action. Action Item 107032 has been initiated for correction of incomplete date for Line Manager Approval for identified qualification card.

Items 10-11 - Revised: There is no impact from this condition as the Fluor Idaho document management system (EDMS) directs the user to the current effective document if a document has been changed or superseded as a result of the consolidation of the two previous contractor programs. Remedial action: Twenty qualifications and checklists are currently under revision to correct identified procedure. Seven have been completed; three pending final review and 10 are in process of update via corrective action 108269.

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Item 12 –

- *AI 107012- Evaluate that MCP-538 Control of Non-Conforming Items procedure requires that the Responsible Manager is required to document the USQ Number/ID in the ICP Issues Management Database (TRACKWISE) NCR electronic form when USQ "Yes: is selected and the QE approving Dispositions with a "USQ "Yes" that the USQ number ID is referenced in the ICP Issue Management electronic form; and revise MCP-538 as required by the evaluation.*
- *AI 107013- Revise MCP-538 to require the Responsible Manager and QE to validate that supporting documentation is correct prior to closure verification.*
- *AI 107015- Provide training to Engineering Responsible Managers and QEs that submit and approve NCR Dispositions on the requirement to identify the USQ number/ID in the ICP Issues Management database field when USQ "Yes" is selected.*

Item 13 - REVISED: The references were the current active approved documents during the consolidation of the previous two QA programs, with a contractual deliverable due to DOE-ID by September 1, 2016. FWD-7, along with the QA Program Requirements Documents contained in Manual 13 were submitted to DOE-ID for approval in August 2016, and subsequently approved for release on November 10, 2016. CBFO approval and release of the QAPjP and Certification plans, PLN-5198 and PLN-5199 occurred on November 11, 2016, subsequent to the release of the approved FWD-7. There is no impact from this condition as the Fluor Idaho document management system (EDMS) directs the user to the current effective document if a document has been changed or superseded as a result of the consolidation of the two previous contractor programs. Remedial action - FWD-7 is in revision under Document Revision Form 353211 which will update the references to current document numbers.

Item 14 - REVISED: The numbering sequence issue was determined to be an isolated instance with the native file for PRD-5071 as a result of the Word track change option affecting the auto numbering feature. This error did not impact any of the technical content associated with this section of PRD-5071 and was determined to be limited to a formatting issue. A review of other PRDs being revised at the time found no additional numbering sequence errors.

Review of MCP-135, Document Management section 4.9 "(Approving Phase) - Approving a Document" places responsibility on the Document Owner as part of the approval to validate among other aspects, that the document format follows applicable company writing standards. In the case of PRD-5071, the numbering sequence issue was not noticed during the document owner approval. Remedial action is in progress; PRD-5071 is in revision and will correct the numbering sequence error under Document Revision Form 353211 via Action Item 107016- Correct documents.

Action to preclude recurrence will entail a Document Control communication to all ICP Core Document Owners as a refresher and reminder of the responsibility and requirements stipulated in MCP-135 for approval of a document via Corrective Action 108209.

Item 15 - Revised: ICP Core EDMS corrects for superseded document callout if user attempts to use document, referring user to correct document. There is no impact from this condition as the Fluor Idaho document management system (EDMS) directs the user to the current effective document if a

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document has been changed or superseded as a result of the consolidation of the two previous contractor programs. Remedial action: TPR-7997 is in revision under Document Revision Form 14862, via Corrective Action 108266, which will update the references to current document numbers.

Item 16 - Revised: AI 107016 - MCP-4029, Training Records Administration, states in section 1: "The records management activities of the training database (see def) are described in MCP-557, Records Management; however, there is no such description in MCP-557. In section 6, the table of records generated by the procedure contains a broken cross reference link in one of the record descriptions. There is no impact from this condition as the Fluor Idaho document management system (EDMS) directs the user to the current effective document if a document has been changed or superseded as a result of the consolidation of the two previous contractor programs. MCP-4029 is in revision under Document Revision Form 353511, via Action Item 107016, which will update the reference.

Item 17 - Revised: AI 107016 -MCP-4026, Personnel Qualification and Certification, has an unnumbered Note under section 3.7, and a reference to a nonexistent revision of MCP-4026 in the Note before section 3.9.2. There is no impact from this condition as the Fluor Idaho document management system (EDMS) directs the user to the current effective document if a document has been changed or superseded as a result of the consolidation of the two previous contractor programs. MCP-4026 is in revision under Document Revision Form 353512, via Action Item 107016, which will update the reference and correct the note.

Scheduled Completion Date: 03/31/2017

Evaluation:

The proposed corrective actions are deemed appropriate to address the conditions adverse to quality documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE

The results of the evaluation of the revised CAP indicate that the remedial actions, investigative actions, and proposed corrective actions to preclude recurrence satisfactorily address the conditions adverse to quality documented in the CAR. Therefore, it is recommended that the revised CAP for CAR 17-010 be approved.

Kathy Hood

Evaluation Performed By: Kathy Hood, CTAC

3-27-17

Date