

United States Government

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: MAY 20 2019

REPLY TO  
ATTN OF: CBFO:OQA:DCG:JM:19-0908:UFC 2300.00

SUBJECT: Notification of Change in Process for Carlsbad Field Office – Office of Quality Assurance Final Classification of Assessment Concerns

TO: Mr. Todd Shrader, CBFO Manager, Office of the Manager

This correspondence serves as a notification to all Waste Isolation Pilot Plant (WIPP) Quality Assurance (QA) participants and affected organizations of a change in Carlsbad Field Office (CBFO) QA's process for final classification of assessment concerns.

CBFO QA assessments performed in accordance with assessment procedures, OP 10.13, *Audits*, Revision 0, and OP 10.4, *Surveillances*, Revision 1, both describe the process for classifying concerns that are identified during assessments. There are four types of classification:

- (1) A condition adverse to quality (CAQ) that is reported on a corrective action report (CAR);
- (2) A CAQ that is corrected during the audit/surveillance (CDA or CDS) which is minor and isolated in nature, requiring only remedial action to correct and for which resolution can be achieved and verified prior to the conclusion of an assessment;
- (3) An observation of a marginally accepted condition, which if not controlled, might later escalate to a CAQ and;
- (4) A recommendation directed towards identifying opportunities for improvement or enhancing methods of implementation.

#### Old Process:

Historically, it has been the practice that concerns identified during CBFO QA assessments, were initially presented to CBFO QA as "preliminary concerns" by the audit team lead (ATL) and the classification determination was then finalized by CBFO QA **after completion of the assessment**. Please be informed that there has been a change in this process, as described below.

#### New Process:

To better align with the roles and responsibilities of qualified ATLs, the ATL in consultation with the CBFO QA Management Representatives (MRs) will make the final determination for classifying concerns. The classification will be made before the end of each assessment and the results will be presented during the post-assessment exit meeting. This practice will enable the ATL, in consultation with the CBFO QA MR, to provide a determination of the overall adequacy, implementation, and effectiveness of the audited processes within the scope of the audit.

The current process for CBFO assessments is to conduct daily management meetings. This is the forum for the assessment team to present to the responsible management, both the status of the assessment, as well as any "concerns" that may have been identified. Please be advised, it will be these meetings in which your organization will be afforded the opportunity to discuss

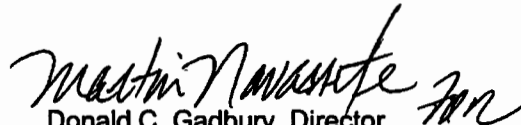
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identified issues and present additional evidence that could abate what may have previously been thought to be an issue.

It is the responsibility of the responsible organization to ensure that the appropriate personnel who make program decisions attend these meetings. If the responsible person is uncomfortable discussing their issues during the management briefing, they may request a separate, smaller meeting with the ATL. Discussing the issues with the ATL, the CBFO QA MR, and/or the OQA Director after the completion of the assessment and after the concern categorizations have been finalized is disruptive to the process which will result in unnecessary delays. Once CARs are issued, if the responsible organization still disagrees with the CAQ, they may document their case in the investigative action section of the corrective action plan and submit it for review to CBFO QA in accordance with MP 3.1, *Corrective Action Reports*.

Please relay this information to the appropriate line managers, site project managers, and field personnel within your organization. I appreciate your cooperation and assistance in implementing this change in the interest of continuous improvement. If you have any questions concerning this matter, please contact me at (575) 234-7372.

  
Donald C. Gadbury, Director  
CBFO, Office of Quality Assurance

cc:

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