

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: May 04, 2021

REPLY TO
ATTN OF: CBFO:OQA:JL:JM:21-0156:UFC 2300.00

SUBJECT: Acceptance of Closure Documentation for CBFO CAR 21-002 from A-20-19 AMWTP
Recertification Audit

to: Mr. J. Malmo, DOE-Idaho

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 21-002. The CAR resulted from Audit A-20-19, conducted September 22 – October 8, 2020. The verification is documented in the attached CAR Continuation Sheet, and indicates that the documentation of completion of corrective actions is acceptable. As a result, the CAR is considered closed.

If you have any questions concerning the CAR closure, please contact me at (575) 499-5054.

JOE
LOPEZ

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by JOE LOPEZ
Date: 2021.05.04
08:17:51 -06'00'

Joe Lopez,
Software Quality Assurance Specialist
Carlsbad Field Office
Office of Quality Assurance

Attachment

210502

cc: w/attachment

L. Perkins, EM-3.113	*ED
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M. Bollinger, CBFO	ED
K. Princen, CBFO	ED
M. Brown, CBFO	ED
D. Jolley, CBFO	ED
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J. McCoy, AMWTP	ED
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T. Runyon, CTAC	ED
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J. Maupin, CBFO	ED
D. Stegman, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
S. Sifuentes, CBFO	ED
Site Documents	ED
CBFO QA File	
CBFO M&RC	ED

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 21-002

2. Activity No: A-20-19

3. Page 1 of 3

Block #17 & 18 Acceptance of Proposed Corrective Actions:

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 21-002, including objective evidence and supporting documentation, submitted via Department of Energy (DOE) Idaho Operations Office letter CLN210911, dated April 29, 2021, from Mr. James A. Malmo, Assistant Manager, Waste Disposition Division, to Mr. Joe Lopez, Quality Assurance Specialist, Department of Energy, Carlsbad Field Office.

Italicized text, taken verbatim from the Corrective Action Plan (CAP), is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

- 1. Initiate a Document Review Form (DRF) for MCP-2064 to revise step 4.8.4. Replace “Manager; Document reported issues using the management Observation Program (MOP) described in MCP-8, “Self Assessments with Manger [sic]: “Document reported issues using facility inspection/issues log”. Justification: MCP-8, Self-Assessments does not address a “Management Observation Program.*

Verification:

The objective evidence submitted in the closure package was reviewed and verified to meet the required remedial actions commitment. The evidence reviewed included the newly revised procedure MCP-2064, Rev. 7, *Implementing Records Management Processes*, and a group read-and-sign training roster with the names of associated qualified operators recorded on it.

INVESTIGATIVE ACTIONS

- 1. During the FY20 WIPP Audit the issue was noted that no objective evidence was given in regard to step 4.8.4 which states “Manager: Document report issues using the Management Observation Program (MOP) described in MCP-8, Self-Assessments” for section 4.8 INL Site Records Center (ISRC) Integrated Pest Management and Facility Monitoring.*
- 2. The INL Battelle Energy Alliance (BEA) contractor is the landlord of IF-663, INL Site Record Center (ISRC), and maintains the facility. For any facility related issues ISRC staff would make verbal phone calls to report any facility issues or pest issues and were not documented. This was the manor all reporting had been done in terms of communicating pest and facility issues based upon guidance in previous revisions of MCP-2064. Therefore, no objective evidence was able to be provided for the audit.*
- 3. Reviewed MCP-2064, Rev. 6 to determine the origin of step 4.8.4 which was added as part of Rev. 6 of the document. Step was added Per CBFO suggestion that “Monitoring actions described in this section be documented and the documentation of the completed actions become a QA record”. This is noted on page 81 of DRF case file 362183 for MCP-2809. Response listed was the following “New Step 4.8.4, added instructing manager to document issues using the Management Observation Program (MOP) per MCP-8, “Self-Assessments.” Findings documented in MOP are kept as QA records.*
- 4. Step 4.8.4 was not approved by Records Management for addition into the document which resulted in Records Management being unaware of the step being added to the procedure and the required documentation. Step 4.8.4 also was not included in the final draft of MCP-2064 Rev. 6 as seen on page 28 of DRF case file 362183.*

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5. *Reviewed MCP-8, Rev 16 Management Observation Program Step 4.5 which was the applicable revision at the time MCP-2064 Rev. 6 was released, Performing Management Observations Note 1 “The Management Observation Program (MOP) promotes management presence in the workspace as a fundamental demonstration of the company’s values of safety, integrity, teamwork, productivity, and results. MOP activities are conducted in one of the following two ways: (1) management workplace visits (MWV) where an individual manager (or a paired team) performs observations to improve program performance through coaching and better understanding of the processes, challenges, and barriers within the organization; or (2) management-led workplace visits of work observation teams (WOTs). Work observation teams are generally comprised of a manager, a subject matter expert and a worker. These activities are reported in the MWV module. (See Appendix C, Performing Management Observations)”. Reporting issues of pest management and facility related issues wouldn’t have applied to the MOP which is for workplace visits.*
6. *Reviewed and confirmed that MCP-8 Rev. 17, Self-Assessments does not address a “Management Observation Program”. Per DRF 362813 workplace visits are not a requirement, therefore step was removed from MCP-8 and placed in GDE-411. MCP-8 revision 17 approved February 12, 2020. The Records Management department was unaware of this change and therefore did not know to remove it from MCP-2064.*
7. *Due to the technical writer adding the suggestion from CBFO review without the approval from the document owner, step 4.8.4 became a finding.*
8. *The DRF case file 362183 for MCP-2064 does not have evidence that the document owner, approved the suggestion from CBFO, step 4.8.4 was inadvertently added.*

Impact Evaluation:

No impact whereas issues are being reported and being addressed.

Verification:

The investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:JL:JM:20-0925:UFC 2300.00.

CAUSAL ANALYSIS

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

1. *Upon final procedure approval ensure adequate review of CBFO suggested comments are applicable for the Records Management program.*
2. *Conduct a tailgate training with staff on documents revisions for updated procedures in a group meeting to discuss changes to the procedures.*

Verification:

Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 21-002 closure package. The documentation reviewed included the newly revised procedure MCP-2064, Rev. 7, *Implementing Records Management Processes*, and a group read-and-sign training roster with the names of associated qualified operators recorded on it.


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ACCEPTANCE

The results of the evaluation of the CAR 21-002 closure package indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in the CAR, and provide adequate measures for precluding recurrence. Therefore, based on the results of the review of the objective evidence included in the CAR 21-002 closure package, it is recommended that CAR 21-002 be closed.

DUSTIN STEGMAN
(Affiliate)

 Digitally signed by DUSTIN STEGMAN
(Affiliate)
Date: 2021.05.03 14:30:06 -06'00'

Evaluation Performed By: Dustin Stegman, CTAC

Date