

U. S. Department of Energy
Carlsbad Field Office

MANAGEMENT PROCEDURE

CBFO MP 3.1, Rev. 8

Effective: April 10, 2006

Expires: April 10, 2008

SUBJECT: CORRECTIVE ACTION REPORTS

 Manager, Carlsbad Field Office: Signature on File

Date: 3/22/06

1.0 PURPOSE

This procedure establishes responsibilities and defines the method for initiating and processing corrective action reports (CARs) to ensure that effective measures are implemented to correct Carlsbad Field Office (CBFO) and participant deficiencies identified by CBFO. CARs are used to identify and correct conditions adverse to quality.

2.0 SCOPE

This procedure applies to CBFO personnel who initiate, track, and verify the completion of corrective actions, and close CARs issued by CBFO. It also applies to those CBFO personnel who investigate, correct, and prevent recurrence of the deficiencies identified in the CARs. This procedure shall be used when CBFO identifies a condition adverse to quality involving a CBFO or participant's process, service, or product. This procedure also provides instructions related to tracking CARs initiated by transuranic (TRU) waste sites. This procedure supersedes Management Procedure (MP) 3.1, revision 7, *Corrective Action Reports*.

3.0 REFERENCES AND DEFINITIONS**3.1 References**

- DOE/CBFO-94-1012, *CBFO Quality Assurance Program Document (QAPD)*
- CBFO MP 3.2, *Deficiency Trending and Reporting*
- CBFO MP 4.5, *Generating, Receiving, Storing, and Controlling Active CBFO Project Records*
- CBFO MP 4.9, *Quality Assurance Records*
- CBFO MP 10.2, *Surveillances*
- CBFO MP 10.3, *Audits*
- *Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP)*
- NMED Compliance Order HWB 01-08 (CO), Settlement Agreement
- NMED Compliance Order HWB 04-07 (CO), Settlement Agreement

AVAILABLE ONLINE AT:
<http://bellview/cbfo/Procedures/ProcedureManualTOC.htm>
INITIATED BY:

CBFO Quality Assurance Manager

3.2 Definitions

- 3.2.1 Accelerated Corrective Action – Process used to achieve timely closure of CARs which document a significant condition adverse to quality, including Resource Conservation and Recovery Act (RCRA)-related CARs, in a process currently certified by CBFO at a TRU waste site.
- 3.2.2 Assessment Team Leader – The leader of a CBFO quality assurance, environmental, or safety and health assessment activity. When the assessment team leader is not a CBFO Quality Assurance (QA) staff member, CAR processing responsibilities are fulfilled by the CBFO QA Manager (QAM) or designee. For CARs issued as a result of assessments performed by the CBFO QA Organization, the assessment team leader is the CBFO QAM or designee.
- 3.2.3 CAR Coordinator – The individual assigned responsibility for administration of the CBFO CAR tracking and reporting system.
- 3.2.4 Condition Adverse to Quality – An all-inclusive term used in reference to any of the following: failures, malfunctions, deficiencies, defective items, nonconformances, and technical inadequacies.
- 3.2.5 Corrective Actions – Measures taken to rectify conditions adverse to quality and, where necessary, to preclude recurrence.
- 3.2.6 Corrective Action Report – A document used to identify and rectify conditions adverse to quality (CAQ) and track the associated corrective actions.
- 3.2.7 Corrective Action Report Initiator – Anyone identifying a condition adverse to quality and reporting that condition on a CAR form for resolution.
- 3.2.8 Corrective Action Verifier – The individual responsible for verification of corrective action completion.
- 3.2.9 Currently Certified TRU Waste Site Process – A process for which a TRU waste site has received formal, written approval from CBFO for characterization, certification, or transportation of TRU waste to the WIPP.
- 3.2.10 RCRA-Related Deficiency – A deficiency that is a violation of the requirements of the HWFP. All RCRA-related deficiencies are considered to be significant conditions adverse to quality.
- 3.2.11 Responsible Organization – The organization responsible for correcting the condition adverse to quality.
- 3.2.12 Significant Condition Adverse to Quality – A condition adverse to quality is considered significant when any of the following apply:
- If uncorrected, the condition adverse to quality could have a serious effect on safety, operability, waste isolation, TRU waste site certification, regulatory compliance demonstration, or effective implementation of the QA Program.
 - The condition adverse to quality is non-compliant with the HWFP.
 - The condition adverse to quality requires immediate notification of regulatory entities (e.g., 10 CFR Part 21).

- The condition adverse to quality indicates a significant failure or breakdown in the implementation of QA Program requirements.
- Repeated attempts to resolve a condition adverse to quality have been unsuccessful.
- The condition adverse to quality is identified in items or activities important to safety or waste isolation and compromises the ability to prevent or mitigate the consequences of an accident, thereby presenting a significant hazard to safety and health of workers and/or the public.

3.2.13 Transportation-Related Deficiency – Any nonconformance to procedures or requirements related to the packaging and transportation of waste to WIPP.

3.2.14 WIPP Operating Record – Records maintained at the WIPP facility as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73) and the WIPP HWFP.

3.2.15 Work Suspension – A formal directive issued by management that work must be stopped until the related significant condition adverse to quality or nonconformance has been resolved.

4.0 **RESPONSIBILITIES**

4.1 CBFO Manager

4.1.1 Maintain overall responsibility for the implementation of the process described in this procedure.

4.1.2 Evaluate and approve requests to extend corrective action completion dates for CARs requiring accelerated corrective action.

4.2 CBFO Office Directors

Ensure that CAR resolution is accomplished in a timely and effective manner, and aid in determining the method of work suspension. When a CAR is initiated outside of a CBFO assessment activity and there is no associated assessment team leader, ensure that the responsibilities contained in section 4.3 are fulfilled.

4.3 Assessment Team Leaders

NOTE: If the assessment team leader is not a CBFO QA staff member, CAR processing responsibilities (e.g., transmittal letters or memoranda) are fulfilled by the CBFO QAM or designee.

4.3.1 Review and concur with CARs that result from an assessment.

4.3.2 Determine if CARs require a work suspension and/or accelerated corrective action (see sections 5.1.5 and 5.1.6)

4.3.3 Approve the proposed corrective actions for CARs.

4.3.4 Monitor the corrective action process for CARs.

4.3.5 Evaluate and approve requests for extension of the response due date and the corrective action completion dates (see section 4.1 for additional information).

4.3.6 Review and approve CAR verification information.

- 4.3.7 Ensure that the CAR coordinator receives copies of all hardcopy and electronic correspondence related to the processing and resolution of CARs.
- 4.3.8 Recommend to the CBFO Manager that TRU waste site certification should be suspended for untimely corrective action in response to CARs requiring accelerated corrective action.
- 4.4 Quality Assurance Manager (QAM) or designee
 - 4.4.1 Determine whether a work suspension is required.
 - 4.4.2 Evaluate and transmit all CARs.
 - 4.4.3 Approve closure of all CARs.
 - 4.4.4 Transmit copies of CARs to the Environmental Protection Agency (EPA) for conditions adverse to quality identified at the TRU waste sites if the CAR is related to an area regulated by the EPA.
 - 4.4.5 Transmit closure information to the EPA for CARs identified in step 4.4.4 when the CARs are closed by CBFO.
 - 4.4.6 Evaluate concerns and issues resulting from external (i.e., EPA, DOE Headquarters, etc.) audits and inspections and, when appropriate, initiate corrective actions in accordance with this procedure.
 - 4.4.7 Provide the New Mexico Environmental Department (NMED) with copies of any correspondence to or from the Advanced Mixed Waste Treatment Project (AMWTP) and/or CBFO regarding CARs associated with waste streams BNINW216 or BNINW218, per NMED Compliance Order HWB 04-07 (CO), Settlement Agreement.
- 4.5 Office Director, Office of Characterization and Transportation (OCT)

Evaluate in writing the impact of CARs requiring accelerated corrective action on TRU waste received at WIPP or proposed for shipment to WIPP.
- 4.6 CAR Initiator

NOTE: When the CAR initiator is a non-CBFO staff member, the interface with the responsible organization shall be coordinated through the assessment team leader for CAR issuance, extension approvals, response evaluations, and corrective action verifications.

 - 4.6.1 Complete CAR blocks 1 through 13b (less items 11b and d) of the CAR form (attachment I).
 - 4.6.2 Assign the appropriate Trend Code in CAR block 13a per CBFO MP 3.2.
 - 4.6.3 Review proposed corrective actions for CARs and make recommendations to the assessment team leader concerning the acceptability of the corrective action plan.
 - 4.6.4 Participate as necessary to ensure that the CAR coordinator receives copies of all hardcopy and electronic correspondence related to the processing and resolution of CARs.
- 4.7 CAR Coordinator
 - 4.7.1 Provide a CAR number, when requested.

- 4.7.2 Administer the CBFO CAR reporting and tracking system.
 - 4.7.3 Prepare a letter or memorandum to the responsible organization when CAR responses or corrective action completions are due or overdue, for issuance by the assessment team leader, as necessary.
 - 4.7.4 Prepare the CAR records package in accordance with section 6.0, Records, and ensure that CAR records packages are complete and properly maintained.
 - 4.7.5 Develop an overdue CAR listing and distribute it to the CBFO QAM and the appropriate assessment team leader(s), at least monthly.
- 4.8 Corrective Action Verifier
- Verify corrective action completion and make recommendations to the assessment team leader concerning the appropriateness of CAR closure.

5.0 **PROCEDURE**

NOTE: Instructions for completing the CAR forms are included in attachment IV.

- 5.1 Corrective Action Report Initiation
 - 5.1.1 Individuals identifying a condition adverse to quality shall discuss the condition with the appropriate members of the responsible organization (CAR block 7) and shall initiate a CAR, using the CAR form and the continuation sheet (attachment I).
 - 5.1.2 The CAR initiator shall obtain a CAR number from the CAR coordinator, complete CAR blocks 1 through 13b (excluding 11b and d), and forward the CAR to the assessment team leader.
 - 5.1.3 The assessment team leader or designee shall review the condition and determine if the CAR is valid.
 - 5.1.4 If the assessment team leader determines the CAR is not valid, the CAR shall be returned, unsigned, to the initiator, along with an explanation of the determination.
 - 5.1.5 When the assessment team leader determines the CAR is valid, he/she shall indicate in CAR block 11b whether a work suspension is needed.
 - 5.1.6 The assessment team leader shall determine if accelerated corrective action is required and mark section 11d of the CAR form accordingly. Accelerated corrective action is required if the CAR documents a significant condition adverse to quality, including any RCRA-related deficiency, in a process currently certified by CBFO at a TRU waste site. CARs not related to processes currently certified by CBFO at the TRU waste sites shall not be marked for accelerated corrective action.
 - 5.1.7 The assessment team leader shall assign a response due date in CAR block 14a, allowing the responsible organization a maximum of 30 days after issuance of the CAR. If CAR block 11d is marked "yes," a required corrective action completion date shall be assigned of no more than 30 days from issuance of the CAR in CAR block 14b.
 - 5.1.8 The assessment team leader shall indicate concurrence with the CAR content by signing in CAR block 15a.
 - 5.1.9 If the CAR is not a significant condition adverse to quality or a work suspension, the assessment team leader shall mark as N/A the QAM signature line in CAR block 15b.

- 5.1.10 The QAM shall sign CAR block 15b for deficiencies determined to be significant conditions adverse to quality and/or work suspensions. If the QAM determines a work suspension is required, the appropriate Office Director shall be notified.
- 5.1.11 The QAM, with the aid of the Office Director, shall determine the appropriate method for implementing the work suspension. The QAM will issue a letter on the appropriate method of work suspension.

- NOTES:**
1. **All deficiencies determined to be conditions adverse to quality require a corrective action plan that addresses the types of actions marked "yes" in CAR block 12. The deficiencies determined to be significant conditions adverse to quality, including any RCRA-related deficiencies, require a corrective action plan that addresses all four types of actions as indicated in CAR block 12.**
 2. **If the Office Director and the QAM are not in agreement with the method of work suspension, the issue shall be elevated to the Assistant Manager for Operations and/or the CBFO Manager, as required.**
 3. **If a work suspension is implemented, the CAR shall serve as the tracking document.**

5.2 CAR Issuance

- 5.2.1 Once the CAR is approved for issuance, the assessment team leader shall prepare a transmittal package containing:
- A. A copy of the CAR
 - B. The CAR transmittal letter if the responsible organization is external to the Department of Energy (DOE) and a CAR transmittal memorandum if the responsible organization is DOE
 - C. A CAR continuation sheet (attachment I) with items 1, 2, and 3 completed and an instruction sheet for preparing the corrective action plan (attachment II)
- 5.2.2 The assessment team leader shall send the transmittal package to CBFO QA for distribution to the responsible organization and CAR coordinator.
- 5.2.3 CARs requiring accelerated corrective action (i.e., CAR block 11d is marked "yes") will also be transmitted, upon issuance, to:
- A. The Office Director, OCT, via memorandum, for impact evaluation as described in paragraph 5.9
 - B. The NMED and the EPA, as appropriate
 - C. The WIPP Operating Record
- 5.2.4 The CAR coordinator shall maintain the CBFO Corrective Action Report Log (attachment III). The CAR log shall contain the following status and tracking information, as appropriate:
- A. CAR number (CAR block 1)
 - B. Activity number (i.e., Surveillance # or Audit #), if applicable (CAR block 2)
 - C. Description of the adverse condition (CAR block 9)

- D. Responsible organization (CAR block 6)
- E. CBFO assessment team leader (CAR block 5)
- F. Trend Code (CAR block 13a)
- G. Date issued (CAR transmittal date)
- H. Date response due (CAR block 14a)
- I. Date response received
- J. Date response accepted (CAR block 16)
- K. Date actions are expected to be completed
- L. Acceptance of corrective action completion date (CAR block 17)
- M. Date closed (CAR block 18)
- N. RCRA-related (CAR block 11c)
- O. Accelerated Corrective Action Required (CAR block 11d)

5.3 Corrective Action Plan

NOTE: The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.

- 5.3.1 A corrective action plan shall be prepared and submitted by the responsible organization to the assessment team leader, addressing each checked item in CAR block 12.
- 5.3.2 If the responsible organization cannot provide an acceptable corrective action plan before the response due date, the responsible organization shall respond with an extension request. The assessment team leader shall approve the extension, if warranted. Verbal extension requests shall be followed up with written extension requests. The assessment team leader shall notify the responsible organization, in writing, of extension approval or rejection, with a copy to the CAR coordinator.

5.4 Corrective Action Plan Evaluation

- 5.4.1 Upon receipt of the corrective action plan from the responsible organization, the assessment team leader shall transmit the plan to the CAR initiator (or another staff member knowledgeable of the condition) for review, with a copy to the CAR coordinator. The CAR initiator, or designee, shall evaluate the proposed actions to ensure that the plan properly addresses the deficiency, contains expected completion dates, and assigns responsibilities for the completion of the corrective actions. Once the review is completed, the CAR initiator, or designee, shall provide to the assessment team leader a recommendation on a CAR continuation sheet for acceptance or rejection of the proposed actions.
- 5.4.2 The assessment team leader shall review the corrective action plan and the recommendations from the CAR initiator. If acceptable, the assessment team leader shall sign CAR block 16.
- 5.4.3 If the corrective action plan is complete and acceptable, the assessment team leader shall issue a corrective action plan acceptance transmittal to the responsible

organization (including the CAR continuation sheet from section 5.4.1), with a copy to the CAR coordinator.

5.4.4 If the corrective action plan is not acceptable, the assessment team leader shall issue a corrective action plan rejection transmittal to the responsible organization (including the CAR continuation sheet from section 5.4.1) along with a new response due date, with a copy to the CAR coordinator.

5.4.5 If at any point in the CAR process resolution of issues cannot be reached, the matter shall be elevated to successive levels of management until resolution is attained.

5.5 Corrective Action Completion

5.5.1 The responsible organization shall:

- A. Complete the actions required to correct the deficiency, addressing each checked item in CAR block 12.
- B. If it becomes evident that the actions will not be completed prior to the established due date, submit a request for extension, in writing, to the assessment team leader for approval. The request shall include a justification for the extension.
- C. Transmit the evidence of corrective action completion to the assessment team leader prior to the completion due date.

5.5.2 If the CAR requires accelerated corrective action (block 11d is marked "yes") and the responsible organization cannot complete corrective actions by the required corrective action completion due date as indicated in CAR block 14b, the responsible organization shall submit a detailed justification to the CBFO Manager via letter or memorandum to the CBFO QAM requesting an extension of the due date.

5.5.3 The assessment team leader shall monitor the status of the responsible organization's corrective actions.

5.5.4 For CARs that require accelerated corrective action, the assessment team leader shall recommend, in writing, to the CBFO Manager through the CBFO QAM, that TRU waste site certification be suspended if corrective action completion is untimely.

5.5.5 The CBFO Manager shall determine if TRU waste site certification should be suspended. The TRU waste site shall be notified, in writing, if certification is suspended. If certification is not suspended, the CBFO Manager will notify the CBFO QAM and the assessment team leader, in writing, and include a description of the basis for not suspending certification. NMED and/or EPA, as appropriate, shall be notified of the decision to suspend or not suspend TRU waste site certification, with a copy to the CAR coordinator.

5.6 Verification of Corrective Action Completion

- NOTE:**
- 1. **CARs issued to address technical deficiencies should be verified by a qualified technical specialist. CARs resulting from QA deficiencies should be verified by a QA auditor.**
 - 2. **If the corrective action verifier is not a CBFO staff member, then the CAR continuation sheet shall be transmitted to the assessment team leader for completion of CAR block 17.**

5.6.1 The corrective action verifier shall:

- A. Upon completion of corrective actions, perform a verification to determine that approved corrective actions have been completed. Verification shall be accomplished as soon as practicable. When feasible, verification may be accomplished by submittal and evaluation of documents and records in lieu of a site visit. When a site visit is necessary for the verification, it may be deferred until the next site visit or be included in the scope of the next scheduled assessment.
- B. Document the verification on a CAR continuation sheet and identify the specific areas investigated, the objective evidence reviewed, and the results of the verification. Indicate verification by signing and dating the CAR continuation sheet. If the verification is not acceptable, the verifier shall document, on a CAR continuation sheet, the corrective actions that were unacceptable or incomplete, or why corrective action could not be verified, and what further actions are required.

5.6.2 If the corrective action verifier does not accept the corrective actions, a transmittal requesting additional actions shall be issued by the assessment team leader to the responsible organization with a new expected completion date identified, with a copy to the CAR coordinator.

5.7 CAR Closure

5.7.1 The assessment team leader shall review verification information and, if closure is justified, obtain the QAM's signature in CAR block 18.

5.7.2 The assessment team leader shall issue a transmittal to the responsible organization informing them of the CAR closure, with a copy to the CAR coordinator.

5.8 Site-Generated CARs

5.8.1 RCRA-related CARs generated by the TRU waste sites are also transmitted to the CAR coordinator for inclusion in the CBFO CAR tracking database.

5.8.2 Upon receipt of a site-generated CAR, the CAR coordinator shall assign a tracking number to the CAR.

5.8.3 Site-generated CARs shall be uniquely identified by site identification letters (e.g., Hanford = RL, AMWTP = IA, ORNL = OR) within the CBFO assigned CAR number (e.g., 05-IA-10).

5.8.4 The CBFO CAR log shall contain the following items:

- A. CAR Number
- B. Description of the adverse condition
- C. Responsible organization
- D. Trend Code
- E. Date issued
- F. Date response accepted
- G. Acceptance of corrective action completion date

- H. Date closed
- I. RCRA-related

- 5.8.5 Upon closure of the site-generated CARs, the site shall transmit a copy of the closed CAR to the CAR coordinator.
- 5.8.6 The CAR coordinator shall transmit RCRA-related, site-generated CAR initiation and closure documentation to the WIPP Operating Record after the information is entered in the tracking database.

5.9 Evaluation of Impact for CARs Requiring Accelerated Corrective Action

- 5.9.1 The Office Director, OCT, or designee shall evaluate the impact of CARs requiring accelerated corrective action.
- 5.9.2 The evaluation shall address waste received by WIPP and waste awaiting shipment.
- 5.9.3 The evaluation shall be documented in writing and transmitted to the CAR coordinator for inclusion in the CAR files. The evaluation shall also be transmitted to the CBFO Manager, CBFO QAM, and the responsible organization, as appropriate.
- 5.9.4 The evaluation will include a determination of whether waste shipments from the TRU waste site should be suspended.
- 5.9.5 Results of the evaluation shall be forwarded to NMED and/or EPA, as appropriate.
- 5.9.6 This evaluation should be completed within 10 working days of OCT receiving the CAR.

- 5.10 The QAM shall transmit copies of any correspondence to or from the AMWTP and/or CBFO regarding CARs associated with waste streams BNINW216 or BNINW218 to NMED, per NMED Compliance Order HWB 04-07 (CO), Settlement Agreement.

6.0 RECORDS

- 6.1 CAR documents shall be processed and maintained as QA records in accordance with MP 4.5 and MP 4.9.
- 6.2 The work suspension letter shall be maintained as a QA record in accordance with MP 4.5 and MP 4.9.
- 6.3 QA records generated by this procedure are the CAR form, continuation sheets, and supporting documentation (e.g., transmittal letters, CAR responses, response evaluations, extension requests and approvals, verification documentation, closure letters and memoranda, and OCT evaluations of CAR impact related to CBFO-certified processes at the TRU waste sites).

7.0 ATTACHMENTS

- Attachment I: Example of a CBFO Corrective Action Report and Example of a CAR Continuation Sheet
- Attachment II: Instructions for Providing Corrective Action Plan
- Attachment III: Example of a CBFO Corrective Action Report Log
- Attachment IV: Instructions for Completing the CAR

EXAMPLE OF A CORRECTIVE ACTION REPORT

1. CAR No.:	2. Activity Report No.:	3. Page	of
4. Controlling document:		5. CBFO Assessment Team Leader:	
6. Responsible organization:		7. CAQ was discussed with:	
8. Requirement that was violated:			
9. Condition Adverse to Quality (CAQ):			
10. Suggested actions (Optional):			
11a. Significant CAQ?		12. Type of actions required:	
Yes <input type="checkbox"/>	No <input type="checkbox"/>	Remedial?	Yes <input type="checkbox"/> No <input type="checkbox"/>
11b. Work Suspension recommended?		Investigative?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>	Root Cause Analysis?	Yes <input type="checkbox"/> No <input type="checkbox"/>
11c. RCRA related?		Actions to Preclude Recurrence?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>		
11d. Accelerated corrective action required?			
Yes <input type="checkbox"/>	No <input type="checkbox"/>		
11e. Does this CAQ affect waste streams BNINW216 or BNIN218?			
Yes <input type="checkbox"/>	No <input type="checkbox"/>		
13a. Trend Code:	13b. CAR Initiator:	Date:	
	<i>(printed name)</i> _____		
14a. Response due date: _____			
14b. Required corrective action completion date: _____			
15. Concurrence:			
a. Assessment Team Leader:		Date:	
<i>(printed name)</i> _____		_____	
b. CBFO Quality Assurance Manager (if applicable):		Date:	
<i>(printed name)</i> _____		_____	
16. Acceptance of Proposed Corrective Actions:		Date:	
<i>(printed name)</i> _____		_____	
17. Acceptance of Corrective Action Completion:		Date:	
<i>(printed name)</i> _____		_____	
18. Closure:		Date:	
<i>(printed name)</i> _____		_____	

EXAMPLE OF A CAR CONTINUATION SHEET

1. CAR No:	2. Activity No:	3. Page ___ of ___.

INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION PLAN

WASTE ISOLATION PILOT PLANT
U.S. DEPARTMENT OF ENERGY
Carlsbad Field Office

**INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION PLAN IN
RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY**

You are requested to provide a corrective action plan in response to this corrective action report (CAR) by the due date identified in block 14a of the CAR. If this date cannot be met, provide a written request for extension to the assessment team leader (CAR block 5). This request must include justification for the delay and must be provided prior to the response due date (CAR block 14a).

The corrective action plan shall address the corrective actions indicated in CAR block 12. As appropriate, develop the plan in accordance with the following sequence and format:

In order to develop the corrective action plan, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # _____
 - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
 - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
 - C. **Root Cause Determination**-Identify the root cause of the condition as determined through investigative actions.
 - D. **Actions to Preclude Recurrence**-Identify the corrective actions required to address the root cause of the condition in order to preclude recurrence.
2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

NOTE: The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.

INSTRUCTIONS FOR COMPLETING THE CAR

<i>Block No.</i>	<i>Performed By</i>	<i>Action</i>
1	CARI	Enter the sequential CAR identification number obtained from the CCOR.
2	CARI	Identify any activity report number associated with the identified deficiency (i.e., Surveillance #, Audit #). Otherwise, mark block N/A.
3	CARI	Enter page numbers.
4	CARI	Identify the applicable requirements document and revision.
5	CARI	Enter the responsible Assessment Team Leader.
6	CARI	Enter the organization responsible for implementing corrective action.
7	CARI	Indicate the person in the RO who was made aware of the condition.
8	CARI	Identify the specific requirements associated with the condition adverse to quality.
9	CARI	Briefly and clearly describe the condition adverse to quality, including representative examples.
10	CARI	Optional. Briefly describe any suggestions for actions to correct the adverse condition.
11a	CARI	Recommend if this is a significant condition adverse to quality.
11b	ATL	Indicate if a work suspension is recommended.
11c	CARI	Determine if the deficiency is a violation of WIPP Hazardous Waste Facility Permit requirements.
11d	ATL	Determine if the deficiency meets the criteria for accelerated corrective action required, i.e., a deficiency in a CBFO certified process at a TRU waste site that is a SCAQ, including any RCRA-related deficiency.
11e	CARI	Determine if the deficiency regards AMWTP waste streams BNINW216 and/or BNINW218.
12	CARI	Identify the applicable corrective action activities. Remedial action is the minimum required for any CAR. Investigative, Root Cause, and Actions to Preclude Recurrence are required for any CAR addressing a SCAQ, including any RCRA-related deficiency.
13a	CARI	Upon initiation of the CAR, assign Trend Code per MP 3.2.
13b	CARI	Name and Date.
14a	ATL	Enter the Response Due Date, allowing the RO a maximum of 30 days from CAR issuance.
14b	ATL	For CARs requiring accelerated corrective action, enter a required corrective action completion date no more than 30 days from CAR issuance. Otherwise, mark the required corrective action completion date "N/A".
15a	ATL	Sign and date indicating concurrence with CAR validity and blocks 1 through 13B. If the CAR is not SCAQ or a work suspension mark 15b "NA".
15b	QAM	Sign if the deficiency is a SCAQ and/or a work suspension.
16	ATL	Sign and date indicating acceptance of proposed corrective action.
17	ATL	Upon verification of corrective action completion, sign and date indicating acceptance.
18	QAM	Sign and date, indicating CAR closure.

AMWTP = Advanced Mixed Waste Treatment Project
 ATL = Assessment Team Leader
 CARI = Corrective Action Report Initiator
 CCOR = CAR Coordinator

QAM = QA Manager
 RO = Responsible Organization
 SCAQ = Significant Condition Adverse to Quality