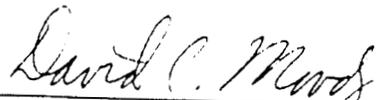


Carlsbad Field Office Action Plan
F&I Commitment 25 – DNFSB Recommendation 2004-1

Carlsbad Field Office
WIPP Site Action Plan
Commitment 25, Feedback & Improvement
DNFSB Recommendation 2004-1

Approved by:



David C. Moody, Manager, Carlsbad Field Office

Note: Change Control for this Site Action Plan (SAP) resides with the Field Office Manager.

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EXECUTIVE SUMMARY

Evaluation Process

This assessment was conducted as part of the Carlsbad Field Office (CBFO) response to Commitment #25 of the Department of Energy's Implementation Plan for Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2004-1, *Oversight of Complex, High-Hazard Nuclear Operations*. This assessment conducted in accordance with instructions provided in the November 17, 2005 DOE Headquarters memorandum from the Chief Operating Officer for Environmental Management and the November 9, 2005 memorandum from the Assistant Secretary for Environmental Management. Specific direction was provided to perform a review of the DOE field office and management and operating contractor in the area of "feedback and improvement". The assessment team utilized existing assessment data, and conducted a focused assessment of specific components as required to fully evaluate the feedback and improvement processes used at the Waste Isolation Pilot Plant (WIPP).

The assessment is the product of a team effort with participation by personnel from the CBFO, the CBFO Technical Assistance Contractor (CTAC), and the Management and Operating (M&O) Contractor, Washington TRU Solutions. The assessment team included 1) the Director of the CBFO Office of Disposal with 20 years geotechnical and environmental management experience, NQA-1 lead auditor training, and completed technical qualifications; 2) the CBFO Safety Officer with 25 years industrial and nuclear safety experience, bachelor's of science with a chemistry major mathematics minor, and completed technical qualifications as safety officer, and nuclear safety specialist. 3) a CTAC senior professional engineer with NQA-1 lead auditor training, 30 years experience in industrial operations management and in safety, and environmental compliance; and 4) an M&O contractor quality assurance auditor with ASQ lead auditor certification and NQA-1 lead auditor training.

Overall Evaluation Summary

The results of this assessment determined that WIPP meets all objectives of the prescribed feedback and improvement (F&I) Criteria Review and Approach Document (CRAD). F&I objective 1 was met with one opportunity for improvement. The objectives F&I-2, and F&I-3 were met with no new opportunities for improvement, but noted corrective actions in progress from previous findings. CBFO also noted several areas of particular strength as feedback and improvement

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have been fully integrated into WIPP processes. This is key to meeting expectations related to consistently changing initiatives that are foundational to WIPP's core work scopes.

Feedback and Improvement CRAD

Objective #	Objective Met	Objective Partially Met	Objective Not Met	Comments
F&I 1	X			No OFI's noted, 1 previous, 1 strength
F&I 2.1	X			No OFI's
F&I 2.2	X			No OFI's, 1 strength
F&I 2.3	X			No OFI's, 1 previous
F&I 2.4	X			No OFI's, 1 strength
F&I 3	X			No OFI's, 3 previous

The WIPP site has adequately established, maintained, and effectively implemented processes to ensure effective feedback and improvement. From systems for identifying deficiencies and reporting such as the Issues Management Program, to conducting formal and informal assessments and reviews, to operator input in programs such as close call and post-job reviews, the processes are extensive and effective for initial reporting. Qualitative and quantitative information is tracked, trended, and analyzed to ensure continued and improved reliability in process implementation. The WIPP lessons learned program has been benchmarked by several organizations and noted as a best practice in a recent DOE EH VPP review. Programs and processes have proven effective in identifying, investigating, reporting, and responding to operational events and incidents, including not only occupational injuries and illnesses, but even first-aid and near-miss cases.

Objective 1

Contractor line management has established a comprehensive and integrated operational assurance system which encompasses all aspects of the processes and activities designed to identify deficiencies and opportunities for improvement, report deficiencies to the responsible managers, complete corrective actions, and share in lessons learned effectively across all aspects of operation.

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Opportunity for Improvement

During review of the contractor assurance system, it was identified that some of the newer directives related to various assessment requirements were in the process, but had not been fully implemented into the Department of Energy's (DOE's) contract with Washington TRU Solutions, LLC (WTS), the Waste Isolation Pilot Plant (WIPP) management and operating contractor (MOC) (Contract No. DE-AC29-01AL66444). Though many components of the referenced directives have been implemented (such as an effective issues management program), the actual requirements to do so have not been incorporated into the WTS contract. Specific actions related to this objective are provided in the following table.

Action Description	Deliverable(s)	Due Date	Owner
Implement new DOE oversight and assurance directives into WIPP procedures and processes.	1. Revise DOE/CBFO 94-1012, <i>CBFO Quality Assurance Program Document (QAPD)</i> in accordance with DOE O 414.1C, <i>Quality Assurance</i> .	7/31/06	CBFO Quality Assurance Manager
	2. Incorporate applicable requirements of DOE O 226.1, <i>Implementation of Department of Energy Oversight Policy</i> , into the CBFO QAPD, DOE/WIPP 98-2287, <i>CBFO Functions, Responsibilities, and Authorities Manual (FRAM)</i> , and DOE/CBFO 04-3299, <i>CBFO Contractor Oversight Plan</i> .	8/31/06	CBFO Manager
	3. Incorporate applicable requirements of DOE O 414.1C into DOE's contract with WTS.	Completed 1/31/06	CBFO Contracts Manager
	4. Incorporate DOE O 226.1 into DOE's contract with WTS.	Completed 1/31/06	CBFO Contracts Manager
	5. Contractor implements DOE O 414.1C at WIPP pursuant to contract	9/30/06	WTS Quality Assurance Manager

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Action Description	Deliverable(s)	Due Date	Owner
	requirements.		
Implement new DOE oversight and assurance directives into WIPP procedures and processes.	6. Contractor implements DOE O 226.1 at WIPP pursuant to contract requirements.	9/30/06	WTS Quality Assurance Manager
	7. In accordance with the CBFO <i>Contractor Oversight and Integrated Evaluation Plans</i> , assess and verify effective implementation.	On-Going FY 2006	CBFO Assistant Manager of Operations

Strength:

WTS has an Issues Management Program that has been in place less than two years, but has already provided significant improvement in allowing a forum for identifying, reporting, and addressing deficiencies and opportunities for improvement receiving immediate management attention and support and using a committee approach for long-term effective resolution. This best practice was recently identified during the DOE EH VPP review as a major strength, and has been benchmarked by other DOE facilities.

Objective 2.1

Contractor line management has established a rigorous and credible assessment program that evaluates the adequacy of programs, processes, and performance on a recurring basis. Formal mechanisms and processes have been established for collecting both qualitative and quantitative information on performance, and this information is effectively used as the basis for informed management decisions to improve performance.

Opportunity for Improvement

No opportunities for improvement were identified related to this objective. WTS, the WIPP MOC, has adequately established, maintained, and effectively implemented a process for planning, scheduling, and performing assessments;

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and trending and tracking other qualitative and quantitative information to identify items, services, activities, and processes needing improvement.

Objective 2.2

The contractor has developed and implemented an Operating Experience Program that communicates effective practices and Lessons Learned during work activities, process reviews, and incident/event analyses to potential users and applied to future work activities.

Opportunity for Improvement

No opportunities for improvement were identified related to this objective. The WIPP Lessons Learned program, which involves both Carlsbad Field Office (CBFO) and WTS staff activities/responsibilities, received comments from DOE EH during recent Voluntary Protection Program (VPP) recertification as a DOE complex best practice.

Objective 2.3

Contractor line management has established and implemented programs and processes to identify, investigate, report, and respond to operational events and incidents, and occupational injuries and illnesses.

Opportunity for Improvement

No opportunities for improvement were identified related to this objective. However, previous existing corrective actions related to a Price-Anderson Amendment and Authorization Act (PAAA) noncompliance, NTS-ALO-CAO-WIPP-2005-0002, have not yet been closed. Specific actions related to this objective are provided in the following table.

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Existing Corrective Actions Identified at WIPP

Criterion	Source of Corrective Action / Identification Number	Corrective Action	Due Date	Action Owner/ Organization
2 of Objective F&I-2.3	WTS Commitment Tracking System (CTS) No. 27583	Revise Mobile Visual Examination and Repackaging System (MOVER) Health and Safety Plan, MOVER Startup and Shutdown procedures, or appropriate WIPP Central Characterization Program (CCP) documents to incorporate recommendations and improvements identified in the Price-Anderson noncompliance report.	09/30/06	WTS CCP Manager

Objective 2.4

A formal process to evaluate the quality and usefulness of feedback, and track to resolution performance and safety issues and associated corrective actions, have been developed and implemented.

Opportunity for Improvement

No opportunities for improvement were identified related to this objective, and no outstanding related corrective actions were identified. The WTS Issues Management Program has been benchmarked in FY2005 as a best practice by the M&O Contractor and DOE Management of the Yucca Mountain Project.

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Objective 3

DOE line management have established and implemented effective oversight processes that evaluate the adequacy and effectiveness of contractor assurance systems and DOE oversight processes.

Opportunity for Improvement

No opportunities for improvement were identified related to this objective. However, the following previous corrective actions from the *CBFO Annual Review of the WIPP Integrated Safety Management System*, November 2005, are considered related to this objective and are included in this action plan. The actions are provided in the following table.

Existing Corrective Actions Identified at WIPP

Criterion	Source of Corrective Action/Identification Number	Corrective Action	Due Date	Action Owner/ Organization
8 of Objective F&I-3	CBFO ISMS Annual Review, Deficiency-D2 and CAR 06-015	Complete the Technical Position Risk Surveys referenced in the FRAM for regulatory and environmental compliance, business, and characterization and transportation positions.	CAR Response 1-31-06 Complete Resulting Corrective Action Due Date TBD	CBFO Authorization Basis Senior Technical Advisor (ABSTA)
8 of Objective F&I-3	CBFO ISMS Annual Review Area for Improvement-AI2	Revise CBFO FRAM	8/31/06	CBFO CBFO Authorization Basis Senior Technical Advisor (ABSTA)
11 of Objective F&I-3	CBFO ISMS Annual Review Area for Improvement AI4	CBFO should update the Employee Concerns Program document, and provide more awareness information to the employees about the process.	3/15/06	CBFO Director, Office of Disposal