



United States Government

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221



DATE: MAR - 6 2013  
REPLY TO  
ATTN OF: CBFO:OQA:DM:CC:13-1342:UFC 2300.00  
SUBJECT: Closure of CAR 13-002 from Audit A-13-02  
TO: Mr. J.R. Stroble, Director, Office of the National TRU Program

The Carlsbad Field Office (CBFO) has completed review and verification of the corrective actions submitted in response to Corrective Action Report (CAR) 13-002, which resulted from CBFO Audit A-13-02, Savannah River Site Central Characterization Program TRU Waste Characterization and Certification Activities. The results of the verification are documented on the attached CAR Continuation Sheet, and indicate that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 13-002 is considered closed.

If you have any questions, please contact me at (575) 234-7491.

*D. S. Miehl*  
Dennis S. Miehl  
Acting Quality Assurance Director

Attachment



Mr. J.R. Stroble

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cc: w/attachment

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T. Morgan, CBFO	ED
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P. Y. Martinez, CTAC	ED
WIPP Operating Record	ED

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

## CAR CONTINUATION SHEET

1. CAR No: 13-002

2. Activity No: A-13-02

3. Page 1 of 1

**Block # 17 Acceptance of Corrective Action Completion**

The Carlsbad Field Office (CBFO) performed an evaluation of the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 13-002, identified during CBFO Audit A-13-02, Savannah River Site Central Characterization Program TRU Waste Characterization and Certification Activities. This CAR was initiated in conjunction with a New Mexico Environment Department (NMED) Observer Inquiry form dated November 30, 2012.

Upon further evaluation of the condition noted in CAR 13-002, it was determined that a condition adverse to quality (CAQ) could not be concluded. This is based on two statements noted in the CAR as follows:

1. *"Use of the cursor pointing to items during the review even without sound **might** potentially influence the independent observation operator's findings."*
2. *"NMED is expressing their concern for this practice in an Observer Inquiry. Their concern is that such practice **may** negatively influence the independence of the Independent Observation."*

Additionally, the conclusion that a CAQ had not occurred is further supported by language noted in the Observer Inquiry. Specifically, the terms "may affect", "could influence", "does not appear" and "may risk" are used throughout the inquiry. Use of these terms does not suggest that a CAQ had occurred. Rather, the potential exists that the continued practice could lead to a CAQ. Therefore, in this particular instance, the condition is more consistent with the definition of an Observation as defined in MP 10.3, Audits, which defines an observation as; *"Documentation of marginally acceptable conditions that, if not controlled, might later escalate into a deficiency. Observations are not deficiencies and do not require a response."*

However, in addition to the established protocols for answering NMED submitted Observer Inquiries, the Office of Quality Assurance elected to document NMED's concern on a CAR as a mechanism to further ensure that the concern was addressed and that the appropriate actions were taken and tracked to closure. Although this approach was unnecessary, it did not hinder the established protocols for fulfilling the required response to NMED.

Accordingly, and in accordance with the requirements of MP 3.1, Corrective Action Reports, the following describes the review conducted to verify that the actions taken in response to the CAR were fulfilled in order to administratively close the CAR.

The approved CAP submitted by NWP National TRU Program Certification identified one action to prevent recurrence. Italicized text, taken verbatim from the CAP, is used to show the correlation between the corrective action and the method used for verification.

**INVESTIGATIVE ACTIONS**

1. *"CCP reviewed the NMED Inquiry, and determined that, while highly improbable, the objectivity of an independent reviewer could be influenced by the actions of the original RTR operator using the "Window Leveling" feature. In order to clarify expectations, CCP prepared a briefing for RTR operators, and completed a presentation of the briefing to all qualified operators by 12/5/2012. The information from this briefing was included in CCP-RTR-101, the CCP Real-Time-Radiography TRU Waste Characterization Briefing, which is required for all initial qualification, and two-year requalification of all RTR operators. The CCP training package was shared with AMWTP, where it will be implemented no later than 1/31/2013."*

**Verification:**

Through review of the CAR closure documentation, the evaluation verified the investigative action and subsequent corrective action proposed in the CAP for CAR 13-002. The CCP briefing was

### CAR CONTINUATION SHEET

1. CAR No: 13-002

2. Activity No: A-13-02

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reviewed to verify that it includes the expectations for the appropriate use of the cursor when using the "Window Leveling" software feature during RTR scans. Additionally, the AMWTP briefing developed to address the cursor issue was reviewed. The reviewer concluded that adequate measures have been taken to address the issue. The review of the closure package indicates that the appropriate actions completed adequately address the condition documented in the CAR.

Based on the results of the review of the objective evidence included in the CAR 13-002 closure package, it is recommended that CAR 13-002 be closed.

  
Verification Performed By: Berry D. Pace

  
Date 3/4/13