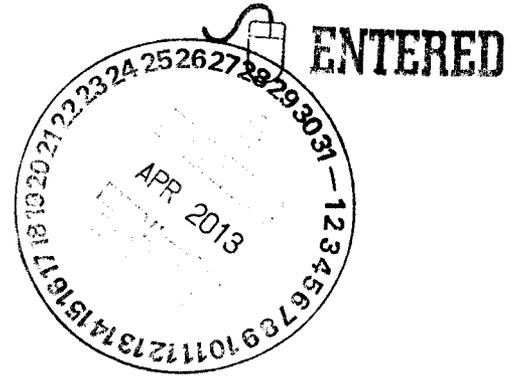




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
APR 29 2013



Mr. D. E. Gulbransen, Manager
National TRU Program Certification
Nuclear Waste Partnership, LLC
P. O. Box 2078
Carlsbad, NM 88221-2078

Subject: Issuance of CARs 13-024, 13-025 and 13-026, Identified During
Audit A-13-11

Dear Mr. Gulbransen:

The Carlsbad Field Office (CBFO) performed Audit A-13-11 of the Central Characterization Project Quality Assurance Program on April 16 - 18, 2013. Enclosed are CBFO Corrective Action Reports (CARs) 13-024, 13-025 and 13-026, addressing the conditions adverse to quality identified during the audit.

Please provide a documented response for the CARs, ensuring that the required actions indicated in Block 12 are addressed, including schedules for completion. Please return your responses to me on or before the due date identified in Block 14a.

If you have any questions or comments regarding the CARs, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
Acting Quality Assurance Director

Enclosure



Mr. D. E. Gulbransen

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APR 29 2013

cc: w/enclosure

M. Navarrete, CBFO	*ED
J. R. Stroble, CBFO	ED
N. Castaneda, CBFO	ED
F. Sharif, NWP	ED
T. Reynolds, NWP/CCP	ED
A. J. Fisher, NWP/CCP	ED
V. Cannon, NWP/CCP	ED
M. Walker, NWP/CCP	ED
J. Carter, NWP/CCP	ED
J. Hoff, NWP	ED
M. Mullins, NWP	ED
T. Peake, EPA	ED
L. Bender, EPA	ED
S. Ghose, EPA	ED
R. Lee, EPA	ED
J. Kieling, NMED	ED
T. Kliphuis, NMED	ED
S. Holmes, NMED	ED
R. Maestas, NMED	ED
P. Gilbert, LANL-CO	ED
G. Lyshik, LANL-CO	ED
R. Castillo, CTAC	ED
K. Martin, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CORRECTIVE ACTION REPORT

1. CAR No.: 13-024	2. Activity Report No.: A-13-11	3. Page 1 of 1
4. Controlling document: CCP-QP-002, Rev. 34	5. CBFO Assessment Team Leader: Dennis Miehl	
6. Responsible organization: NWP CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: A.J. Fisher	
8. Requirement that is involved: CCP-QP-002, Rev. 34, CCP Training and Qualification Plan, Section 4.1.2 [G.4] states, "Other required formal training materials, such as the Waste Analysis Plan (WAP)/Quality Assurance Project Plan (QAPjP) Briefing or training determined by a training evaluation (i.e. classroom, OJT, or self-paced instruction) shall be approved for format, technical content, and use by a SPM and the Manager Responsible for Training. (a) As initial and continuing qualification and training requirements change, these approved training materials shall be revised by Training. (b) All approved training materials shall be maintained, secured, and controlled by Training."		
9. Condition Adverse to Quality (CAQ): CCP Training Module CCP-113, <i>CCP Subject Matter Expert/On-the-Job Training Instructor</i> , has a document number, revision number, and effective date; yet, changes were made to the electronic version of this module without a formal revision. The version of the document used by new Subject Matter Expert/On-the-Job-Training (SME/OJT) trainees is the electronic version, which contained information that was inaccurate. The auditee provided a revised briefing prior to close-out of the audit. However, the method used to revise and control training materials is not specified.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
13a. Trend Code: DC03	13b. CAR Initiator: <u>Kate Martin</u> <i>(printed name)</i>	Date: <u>4/25/13</u>
14a. Response due date: <u>5-21-13</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Dennis S. Miehl</u> <i>(printed name)</i>		Date: <u>4-29-13</u>
b. CBFO Quality Assurance Director: <u>Dennis S. Miehl</u> <i>(printed name)</i>		Date: <u>4-29-13</u>
16. Acceptance of Proposed Corrective Actions: _____		Date: _____
17. Acceptance of Corrective Action Completion: _____		Date: _____
18. Closure: _____		Date: _____

CORRECTIVE ACTION REPORT

1. CAR No.: 13-025	2. Activity Report No.: A-13-11	3. Page 1 of 1
4. Controlling document: CCP-QP-002, Rev. 34	5. CBFO Assessment Team Leader: Dennis Miehls	
6. Responsible organization: NWP CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: A.J. Fisher	
8. Requirement that is involved: CCP-QP-002, Rev. 34, <i>CCP Training and Qualification Plan</i> , Step 3.2.10 states, "SPM, submit the briefing materials and the completed briefing sheet(s) (or personnel can send individual email acknowledgements) to Training. Also, Step 5.1.1 states, "Records generated during the performance of this plan are maintained as quality assurance (QA) records in accordance with CCP-QP-008. The records are the following: [F] Training materials (e.g., course presentation, exam) and [G] Completed attendance/briefing forms."		
9. Condition Adverse to Quality (CAQ): Per CCP-QP-002, Rev. 34, the Site Project Manager (SPM) is required to submit Acceptable Knowledge (AK)/Waste Stream Training briefing materials, along with the completed briefing sheet(s), to training. During the auditor's review of AK briefings that were submitted to Training by the SPM, six of approximately 15 did not contain briefing materials. However, the auditee provided briefing materials for all briefings prior to close-out of the audit. It was noted that during the audit interviews, Training personnel were not familiar with the requirements to retain the AK briefing materials, as specified per procedural requirements. Training personnel did indicate that they retained the briefing materials with the briefing attendance sheets when they were submitted to Training. CCP-QP-002, Rev. 34, Section 3.2.10 requires both the briefing materials and briefing attendance sheets to be submitted to Training.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: RM06	13b. CAR Initiator: (printed name) <u>K. Castella for</u> 1. Katie Martin	Date: <u>4/25/13</u>
14a. Response due date: <u>5-21-13</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): (printed name) <u>Dennis S. Miehls</u>	Date: <u>4-29-13</u>	
b. CBFO Quality Assurance Director: (printed name) <u>Dennis S. Miehls</u>	Date: <u>4-29-13</u>	
16. Acceptance of Proposed Corrective Actions: (printed name) _____ Date: _____		
17. Acceptance of Corrective Action Completion: (printed name) _____ Date: _____		
18. Closure: (printed name) _____ Date: _____		

CORRECTIVE ACTION REPORT

1. CAR No.: 13-026	2. Activity Report No.: A-13-11	3. Page 1 of 1
4. Controlling document: CCP-QP-002, Rev. 34	5. CBFO Assessment Team Leader: Dennis Miehl	
6. Responsible organization: NWP CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: A.J. Fisher	
8. Requirement that is involved: CCP-QP-030, Rev. 8, <i>CCP Written Practice for the Qualification of CCP Helium Leak Detection Personnel</i> , and CCP-QP-032, Rev. 1, <i>CCP Written Practice for the Qualification of CCP Pressure Change Leak Testing Personnel</i> , state in Section 4.7 of each procedure, "After the candidate has completed all required examinations in the allotted time, the ASNT LT-III or LT-III (L) shall grade and sign the examinations and/or checklists."		
9. Condition Adverse to Quality (CAQ): During the review of CCP Pressure Change Leak Testing Personnel Qualification files and CCP Helium Leak Detection Personnel Qualification files, it was identified that ASNT LT-III or ANST LT-III (L) personnel are not signing all exams after grading them.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: RM06	13b. CAR Initiator: <u>Katie Martin</u> <small>(printed name)</small> Katie Martin	Date: <u>4/29/13</u>
14a. Response due date: <u>5-21-13</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Dennis S. Miehl</u> <small>(printed name)</small> Dennis S. Miehl	Date: <u>4-29-13</u>	
b. CBFO Quality Assurance Director: <u>Dennis S. Miehl</u> <small>(printed name)</small> Dennis S. Miehl	Date: <u>4-29-13</u>	
16. Acceptance of Proposed Corrective Actions: _____ <small>(printed name)</small> _____ Date: _____		
17. Acceptance of Corrective Action Completion: _____ <small>(printed name)</small> _____ Date: _____		
18. Closure: _____ <small>(printed name)</small> _____ Date: _____		