



  
**Department of Energy**  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221

MAY 22 2013



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

Subject: Approval of the CAP for CBFO CAR 13-024, Audit A-13-11, Central Characterization Program Quality Assurance Program

Dear Mr. Gulbransen:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 13-024. The results of the review indicate that the CAP is acceptable, as documented on the enclosed CAR Continuation Sheet. Upon completion of all corrective actions as outlined in the approved CAP, please provide notification and documentation supporting closure of this CAR so that verification activities may be performed.

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

Sincerely,



Dennis S. Miehl  
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

J.R. Stroble, CBFO	*ED	J. Kieling, NMED	ED
M. Navarrete, CBFO	ED	T. Kliphuis, NMED	ED
T. Reynolds, NWP/CCP	ED	S. Holmes, NMED	ED
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J. Hoff, NWP/QA	ED	K.D. Martin, CTAC	ED
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T. Peake, EPA	ED	G. White, CTAC	ED
L. Bender, EPA	ED	WIPP Operating Record	ED
S. Ghose, EPA	ED	CBFO QA File	
R. Lee, EPA	ED	CBFO M&RC	

\*ED denotes electronic distribution



## CAR CONTINUATION SHEET

1. CAR No: 13-024

2. Activity No: A-13-11

3. Page 1 of 2

**Block # 16 Acceptance of Proposed Corrective Actions:**

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 13-024. The CAP was submitted via Nuclear Waste Partnership LLC letter CP:13:01200, dated May 15, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification, Central Characterization Program, to Mr. Dennis S. Miehls, Senior Quality Assurance Specialist, CBFO Quality Assurance.

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

**REMEDIAL ACTIONS**

*The Remedial Action section is solely to identify the actions necessary to address the specific issues identified in the CAR, to provide assurance that they have been corrected or otherwise resolved. These actions are included for completeness only, and are separate from the actions necessary to preclude recurrence.*

- a) *As noted in the CAR, NTPC provided a revised SME/OJT briefing to the auditor prior to close-out of the audit.*

**Evaluation:**

The remedial action taken, as described above, is deemed suitable.

**INVESTIGATIVE ACTIONS**

*The only change made to the SME/OJT module was to replace two points of contact with then-current names and e-mail addresses. No changes were made to the content itself. The change was made about March 2010, shortly after the transfer of one individual to the Training group.*

*Had the requirements in Section 4.1.2[G.4] of CCP-QP-002 been followed, the CAR condition would not have occurred. This section establishes the requirements for approval of formal training materials and revisions, and does not allow informal changes for any reason.*

***Extent***

*NTPC performed a review of other active training modules to determine if the same condition existed anywhere else. Training has confirmed that all active training modules are in Q&MIS, along with the requisite approvals (one is in-works, awaiting approval), and that no informal changes have been made to any of them. The extent of the CAR condition is limited to the one SME/OJT module cited in the CAR.*

***Impact***

*There was no impact from updating the points of contact in the SME/OJT module. When the module was revised during the audit, the material was updated and some sections were re-organized for clarity. However, none of the changes affected the technical content of the module; the previous version was adequate for its purpose, which is to instruct SME/OJT Instructors in their duties and responsibilities.*

**Evaluation:**

The investigative actions described above provide reasonable assurance that all necessary efforts were made to appropriately identify both the extent and impact of the condition and the necessary corrective actions to preclude recurrence.

## CAR CONTINUATION SHEET

1. CAR No: 13-024

2. Activity No: A-13-11

3. Page 2 of 2

**ROOT CAUSE DETERMINATION**

Not required by the CAR.

**ACTIONS TO PRECLUDE RECURRENCE**

*As discussed elsewhere in this section of the Corrective Action Plan, this was a one-time occurrence that happened three years ago. Shortly after the transfer of one individual to Training.*

- a) *The Manager Responsible for Training has briefed both individuals in the Training group on the applicable requirements of CCP-QP-002, including the person who changed the points of contact information in the SME/OJT module without revising the document. Both individuals are well aware of the requirements and there has been no recurrence since the original event in March 2010.*

**COMMITMENTS**

*All actions are complete as of*

**DUE DATES**

*5-15-2013*

Evaluation:

A review of the proposed CAP associated with actions to preclude recurrence has determined that the proposed corrective actions are acceptable.

**ACCEPTANCE**

The results of the evaluation of the CAP indicate that the proposed corrective actions, including commitments, satisfactorily address the conditions adverse to quality documented in CAR 13-024, and provide adequate measures to preclude recurrence. Therefore, it is recommended that the CAP for CAR 13-024 be approved.

*Katie D. Martin*

*5/16/13*

**Evaluation Performed By:** Katie D. Martin

**Date:**