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Department of Energy
Carlsbad Field Office
P. O. Box 3090
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May 28, 2013

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

Subject: Approval of the CAP for CBFO CAR 13-030

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) 13-030 dealing with the lack of required dates for real-time radiography scans on the Site Project Manager checklists, which was identified during the recertification audit at the Savannah River Site in November 2012, and misclassified as an Observation (re: CBFO CAR 13-023). 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
Acting Director, Office of Quality Assurance

Enclosure

cc: w/enclosure

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WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 13-030

2. Activity No: N/A

3. Page 1 of 2

Section 16 – Acceptance of Proposed Corrective Action for CAR 13-030. An evaluation has been performed of the Corrective Action Plan (CAP) submitted in response to CBFO Corrective Action Report (CAR) 13-030, transmitted in memorandum CP:13:01210, dated May 21, 2013, from D. E. Gulbransen to D. S. Miehl.

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. *The three BDRs cited in the CAR were all corrected during the audit period of November 7-9, 2012: BDRs SR4RTR0196 and SR4RTR0248 were corrected on November 7, 2012, and BDR SRSRTR0548 was corrected on November 8, 2012.*
- b. *During the investigation into extent of condition, NTPC discovered one additional BDR (RTR11-00130) where RTR was performed on more than one day, but the SPM checklist carried only one examination date. The SPM checklist for BDR RTR11-00130 was corrected and now reflects both examination dates.*

Evaluation:

The remedial actions taken by Nuclear Waste Partnership/Central Characterization Program (NWP/CCP), as described above, are deemed acceptable for resolving the specific instance noted in CAR 13-030.

INVESTIGATIVE ACTIONS

Extent

Approximately 255 RTR BDRs have been processed through SPM review (all sites) since the recertification audit at SRS. NTPC performed a sample review of 129 (50%) of the SPM checklists associated with these BDRs, to determine whether the dates for each examination had been properly recorded. The sample included 90 RTR BDRs where all containers were examined on a single day and 39 RTR BDRs where containers were examined on more than one day. The review showed that, for all cases but one, where the examinations lasted for more than one day, the dates for each examination were properly recorded on the SPM checklist. The single exception was BDR RTR11-00130. The SPM checklist showed an examination date of April 11, 2011. All drums in the BDR were run on April 11, 2011, except for the last one, which was run on April 12, 2011. Due to oversight, the SPM did not include April 12, 2011, as an examination date in the SPM checklist. As noted in the Remedial Section of this Corrective Action Plan, BDR RTR11-00130 has been corrected to reflect both examination dates.

Impact

The checklist summarizes information that is always available from the data sheets in the BDR, so there is not impact from the CAR condition.

CAR CONTINUATION SHEET

1. CAR No: 13-030

2. Activity No: N/A

3. Page 2 of 2

Evaluation:

The investigative actions taken by NWP/CCP are deemed acceptable in determining the extent and impact of the condition noted in CAR 13-030.

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTIONS TO PREVENT RECURRENCE

- a. *As soon as the concern was raised during the SRS recertification audit, the CCP Certification Manager reminded the SPMs of the requirement to record the dates for each examination, in the appropriate blocks of the SPM checklists, for examinations lasting more than one day. As noted elsewhere in this Corrective Action Plan, a sample review of SPM checklists completed since the SRS recertification audit indicates that SPMs are now entering each examination date on their checklists. To reinforce the message, NTPC will send another reminder to SPMs, using the electronic assigned reading process in the Training module of the Integrated Data Center.*
- b. *NTPC will revise the SPM checklists that appear as attachments in the CCP-TP-001, to change "Date" blocks to "Date(s)" to align with the requirement in Section 4.2.4.*

Evaluation:

The actions to be taken to prevent recurrence by NWP/CCP, as described above, are deemed appropriate for reducing the likelihood of recurrence.

CAP Evaluation:

The CAP has been evaluated for adequacy in response to CAR 13-030. Acceptance of the CAP is recommended.



Evaluation Performed By: Berry D. Pace

5/22/13

Date