



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



May 29, 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 13-026, 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) 13-026. 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 any 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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S. Ghose, EPA	ED	WIPP Operating Record	ED
R. Lee, EPA	ED	CBFO QA File	
J. Kieling, NMED	ED	CBFO M&RC	

*ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 13-026

2. Activity No: A-13-11

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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) 13-026. The CAP was submitted via Nuclear Waste Partnership LLC letter CP:13:01207, dated May 21, 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.

See the Extent section of this Corrective Action Plan for an explanation of the remedial actions listed below.

- a) In-house LT-III and LT-III(L) personnel will review the unsigned examinations for which they were responsible, and attest in writing that they were the ones who administered and graded these examinations.*
- b) NTPC will collect documentation confirming that contracted Level III personnel who administered examinations but did not sign them, were approved for the activity at the time of the examinations.*

Evaluation:

The remedial actions taken, as described above, are deemed suitable.

INVESTIGATIVE ACTIONS*Extent*

NTPC performed a review of personnel files for all individuals currently qualified to perform Pressure Change Leak Testing (PCLT) and Helium Leak Detection (HLD) testing, and identified the examinations which were not signed by the LT-III or the LT-III(L). The majority of unsigned examinations were the responsibility of the in-house LT-III and the in-house LT-III(L). The remainder of the unsigned examinations were the responsibility of three outside Level IIIs who provided training and administered examinations under contract to NWP: Mr. Mark Johnson, Mr. Edward Briggs, and Mr. Robert Liemenstoll.

- a) The remedial action for the unsigned examinations from in-house LT-III and LT-III(L) personnel will be to have these individuals review the examinations and attest in writing that they were the ones who administered and graded the examinations. Documentation to this effect will be added to the qualification files for the affected PCLT and HLD operators.*
- b) The remedial action for the unsigned examinations from contracted Level III personnel will be to confirm that, during the time that the examinations were administered, there is documentation showing that they were approved to do so. Documentation to this effect will be added to the qualification files for the affected PCLT and HLD operators.*

CAR CONTINUATION SHEET

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Impact

Based on the investigation, the unsigned examinations were administered and graded by LT-III and LT-III(L) personnel qualified to do so under the NTPC program. There is no impact from failure to sign the examinations, and the qualification of PCLT and HLD operators are not in question.

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.

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

The reason that the examinations were not signed was that the examination forms did not have a space for the LT-III or the LT-III(L) to sign them.

- a) *NTPC will revise the forms to add spaces for the LT-III or the LT-III(L) to sign for administering and grading the examinations.*

COMMITMENTS
Anticipated Completion Date:

DUE DATES
 6-17-2013

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 13-026, and provide adequate measures to preclude recurrence. Therefore, it is recommended that the CAP for CAR 13-026 be approved.

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

5/28/13
 Date: