



Department of Energy 
 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 13-025, 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) 13-025. 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

J.R. Stroble, CBFO	*ED	S. Holmes, NMED	ED
M. Navarrete, CBFO	ED	R. Maestas, NMED	ED
T. Reynolds, NWP/CCP	ED	C. Smith, NMED	ED
V. Cannon, NWP/CCP	ED	P. Gilbert, LANL-CO	ED
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J. Hoff, NWP/QA	ED	K.D. Martin, CTAC	ED
M. Mullins, NWP/QA	ED	R. Castillo, CTAC	ED
W. Ledford, NWP/QA	ED	P. Hinojos, CTAC	ED
T. Peake, EPA	ED	D. Harvill, CTAC	ED
L. Bender, EPA	ED	G. White, CTAC	ED
S. Ghose, EPA	ED	WIPP Operating Record	ED
R. Lee, EPA	ED	CBFO QA File	
J. Kieling, NMED	ED	CBFO M&RC	
T. Kliphuis, NMED	ED	*ED denotes electronic distribution	



CAR CONTINUATION SHEET

1. CAR No: 13-025

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) 13-025. The CAP was submitted via Nuclear Waste Partnership LLC letter CP:13:01201, dated May 17, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification, Central Characterization Program, to Mr. Dennis S. Miehl, 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, Training provided briefing materials for all briefings prior to close-out of the audit.*

Evaluation:

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

INVESTIGATIVE ACTIONS*Extent***Briefings and Rosters for AK Summary Reports Reviewed During the Audit**

The CAR states that "...six of approximately 15 did not contain briefing materials." Shortly after the close of the field work for the audit, Training provided the auditor with objective evidence that the SPMs had provided four of these six briefings to Training, in electronic form, at the time the briefings were originally given in June 2012, December 2012, and April 2013 (prior to the audit). Two of these four briefings had been printed off and inserted into the hard copy Training files before the audit; the other two were printed off and inserted into the hard copy Training files during the audit. All four of these briefings have been in Training's possession since the time they were submitted by the SPMs when the briefings were originally given. The four briefings are for these AK Summary Reports:

- *CCP-AK-LANL-006, Revision 12*
- *CCP-AK-LANL-012, Revision 3*
- *CCP-AK-SRS-550, Revision 1*
- *CCP-AK-SRS-560, Revision 1*

This objective evidence supporting the above discussion will be re-submitted in the closure report for this CAR.

The extent of condition review shows that Training did not have two of the briefings for the approximately 15 briefing materials evaluated during the audit, not six. Training provided briefing materials for the other two briefings prior to close-out of the audit so that, as noted in the CAR, Training provided briefing materials for all briefings prior to close-out of the audit.

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Briefings and Rosters for Twenty-One Other AK Summary Reports Created or Revised During the Past Year

Training has determined that 36 AK Summary Reports were created or revised in the year prior to the audit. This section describes the actions taken by Training after the audit to investigate the 21 additional AK Summary Reports that were not evaluated during the audit. AK briefings are required only if the associated AK Summary Reports meets the conditions specified in Section 4.2.1 of CCP-QP-002. Training checked to see whether AK briefings were required for each of the remaining 21 AK Summary Reports and, if so, whether attendance rosters and briefings were available in Training files. The results are as follows:

- Seventeen (17) AK Summary Reports required briefings and attendance rosters. Briefings and attendance rosters were available in the files for all 17 reports. During the investigation, Training did not have to request that any materials be turned in - they had already been provided to Training in accordance with procedural requirements.*
- Four of the AK Summary Reports did not require briefings, and therefore, no attendance rosters.*

In summary, of the 36 AK Summary Reports created or revised in the past year:

- a) Four reports did not require a briefing*
- b) Training had the briefings and rosters for 30 reports*
- c) Training had to obtain briefings for two of the reports, and did so before close-out of the audit*

The extent of condition is limited to the two reports found during the audit.

Impact

- a) All AK briefings were prepared and presented by the SPMs in accordance with the procedure, and all attendance rosters were submitted to Training. The two briefings that had not been turned in by the SPMs were requested, provided to Training, and placed in the files before close-out of the audit. Since the materials were available, there was no technical impact.*
- b) The CAR correctly states that Training personnel were not familiar with the requirements to retain the AK briefing materials until the question was raised during the audit. NTPC agrees that personnel are to be familiar with the requirements of procedures governing their activities. The impact was that two AK briefings were not turned in, and Training was not aware that two of their files were incomplete.*

Virtually all of the SPMs were aware of the requirement to turn their briefings in to Training, as evidenced by the fact that Training had 30 of the 32 required briefings in their possession.

Action to address this situation is identified elsewhere in this Corrective Action Plan.

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: 13-025

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ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

- a) *NTPC will provide a briefing to Training personnel and to the two SPMs who failed to submit their AK briefings, going over the applicable requirements of CCP-QP-002.*

COMMITMENTS

Anticipated Completion Date:

DUE DATES

5-22-2013

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 13-025, and provide adequate measures to preclude recurrence. Therefore, it is recommended that the CAP for CAR 13-025 be approved.

Katie D. Martin

5/28/13

Evaluation Performed By: Katie D. Martin

Date: