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

JUN 11 2013



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

Subject: Review and Verification of the Corrective Actions Submitted in Response to CBFO  
CAR 13-025 Resulting From CBFO Audit A-13-11 of the CCP QAP

Dear Mr. Gulbransen:

The Carlsbad Field Office (CBFO) has completed review and verification of the corrective actions submitted in response to CBFO Corrective Action Report (CAR) 13-025, which resulted from CBFO Audit A-13-11 of the Central Characterization Program (CCP) Quality Assurance Program (QAP). The results of the verification are documented on the enclosed CAR Continuation Sheet, and indicate that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 13-025 is considered closed.

If you have any questions or comments concerning the closure of CAR 13-025, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls  
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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



## CAR CONTINUATION SHEET

1. CAR No: 13-025

2. Activity No: A-13-11

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Block # 17 Acceptance of Corrective Action Completion:

The Carlsbad Field Office (CBFO) has performed an evaluation of the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 13-025, identified during CBFO Audit A-13-11, Central Characterization Program Quality Assurance Program. The closure documentation was submitted via Nuclear Waste Partnership LLC (NWP) letter CP:13:01220 UFC:2300.00, dated May 30, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification (NTPC), to Mr. Dennis S. Miehl, Senior Quality Assurance Specialist, Carlsbad Field Office. The methods used to verify completion of the actions contained in the approved corrective action plan (CAP) are described below.

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.*

Verification:

Remedial actions were evaluated and found to be acceptable, as documented in CBFO letter CBFO:OQA:DM:MAG:13-1432:UFC 2300.00.

## 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 briefing 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.*

**Verification:**

*Investigative actions were evaluated and found to be acceptable, as documented in CBFO letter CBFO:OQA:DM:MAG:13-1432:UFC 2300.00.*

**ROOT CAUSE DETERMINATION**

**Not required by the CAR.**

## CAR CONTINUATION SHEET

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## 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.*

Verification:

A training briefing provided to Training personnel: *Briefing for CBFO CAR 13-025: Submittal of Acceptable Knowledge Briefings and Attendance Rosters to NTPC Training*, and the attendance roster, were provided as evidence for completion of this corrective action. The training briefing provided to Training personnel described the condition adverse to quality, the applicable requirements, and a summary of the briefing. The briefing was completed on May 20, 2013. The verification activities have determined that the associated corrective actions are a suitable approach to resolve the CAR condition and prevent further recurrences.

As noted in the closure documentation submitted by NWP for this CAR, additional information was provided to show receipt of acceptable knowledge (AK) briefings by NTPC Training. It is noted that this information demonstrates that the briefings were received electronically by NTPC Training; however, during the course of the audit some of those briefings were not physically available in the records area of NTPC Training. Prior to the close of the audit, the auditor was able to verify that these briefings were located in the records area of NTPC and that the additional briefings were received and included in the NTPC Training records area.

## ACCEPTANCE

Based on the results of the review of the objective evidence included in the CAR 13-025 closure package, it is recommended that CAR 13-025 be closed.

Katie Martin

Verification Performed By: Katie Martin

6/10/13

Date