



**From:** Maestas, Ricardo, NMENV  
**Sent:** Tuesday, August 06, 2013 1:58 PM  
**To:** Allen, Pam, NMENV  
**Subject:** FW: CTAC QA Audit Report, Cover Letter, Audit Close Out Summary Reports  
**Attachments:** Audit Closeout Summary 4-29-2013.pdf; Audit Closeout Summary-Revision 06-11-2013.pdf; CBFO-CTAC QA Audit Cover Letter 6-11-2013.pdf; CBFO-CTAC QA Audit Report - Final-6-11-2013-.pdf

Email and attachments for WIPP file

---

**From:** Holmes, Steve, NMENV  
**Sent:** Wednesday, June 12, 2013 11:27 AM  
**To:** Maestas, Ricardo, NMENV; Smith, Coleman, NMENV; [Conniewalk@aol.com](mailto:Conniewalk@aol.com)  
**Subject:** FW: CTAC QA Audit Report, Cover Letter, Audit Close Out Summary Reports

Interesting!

---

**From:** Bender, Lindsey [<mailto:Bender.Lindsey@epa.gov>]  
**Sent:** Wednesday, June 12, 2013 11:19 AM  
**To:** [Jose.Franco@wipp.ws](mailto:Jose.Franco@wipp.ws)  
**Cc:** Navarrete, Martin - DOE; Miehl, Dennis - DOE; [alton.harris@em.doe.gov](mailto:alton.harris@em.doe.gov); Holmes, Steve, NMENV; Kliphuis, Trais, NMENV; Hall, Timothy, NMENV; Stone, Nick; Peake, Tom; Site Documents - DOE; Ghose, Shankar  
**Subject:** CTAC QA Audit Report, Cover Letter, Audit Close Out Summary Reports

Attached are the following: 1) original Audit Close Out Summary 2) revised Audit Close Out Summary 3) Cover Letter for the QA Audit report and 4) "EPA Remote Audit of the CBFO CTAC Quality Assurance Program" report. A hard copy of the report and cover letter will be mailed today.

EPA did not identify any nonconformances in CTAC's QA program relative to the requirements of ASME NQA-1-1989. EPA did identify two observations.

Reason for the revised Audit Close Out Summary: When we did the audit close out summary and draft report of the CTAC QA audit from April, we realized we had inadvertently created another category (Follow-Up). Finding, Concern & Observation are the 3 categories we typically use and wanted to correct this. The original "Audit Close Out Summary April 29, 2013," had an observation and a follow-up item.

To be consistent with the past we are reclassifying the follow-up item as an observation. Attached is the revised "Audit Close Out Summary April 29, 2013, [*Revised June 11, 2013*]." We are giving you a heads up on this and letting you know the report reflects this reclassification. We do plan to follow-up on this observation at a later date.



**Lindsey Bender**

**US EPA (6608J)  
Center for Waste Management & Regulations  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460-2001  
Phone: 202-343-9479 Fax: 202-343-2305**

**Physical Location & for deliveries:  
Cube 547K  
1310 L Street, N.W.  
Washington, DC 20005**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



JUN 11 2013

OFFICE OF  
AIR AND RADIATION

Dennis Miehl and Martin Navarrete  
Acting Quality Assurance Manager  
Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221-3090

Dear Messrs. Miehl and Navarrete:

On April 8-29, 2013, the U.S. Environmental Protection Agency (EPA) conducted a remote records audit of the Carlsbad Field Office (CBFO) Technical Assistance Contractor (CTAC). This audit was conducted off site.

The EPA audit team evaluated the CTAC quality assurance (QA) program relative to the requirements of American Society of Mechanical Engineers (ASME) Nuclear Quality Assurance (NQA) Standard NQA-1-1989, "Quality Assurance Program Requirements for Nuclear Facilities." Twelve of the 18 NQA-1 Elements were evaluated.

The EPA audit team reviewed documents and copies of records provided by CTAC and determined that the CTAC QA program continues to comply with these NQA-1-1989 elements and continues to have sufficient independence, authority and resources to verify the quality of items and activities that are important to long-term isolation of transuranic (TRU) waste.

EPA did not identify any nonconformances in CTAC's QA program relative to the requirements of ASME NQA-1-1989. EPA did identify two Observations. One Observation was related to periodic requalification requirements for inspection and test personnel, as described in NQA-1-1989, Supplement 2S-1, paragraph 2.6. The EPA audit team also made a second Observation. In some cases, NQA-1-1989 requires a review or evaluation, but Carlsbad Field Office's (CBFO) applicable procedures specify only to record a memorandum, approval or acceptance, not conduct the review that would generate these records. The required review or evaluation is implicit but not stated in the CBFO procedures. For example, NQA-1-1989, Supplement 11S-2, paragraph 4, requires that verification test results be evaluated by a responsible authority. The Performance Demonstration Program (PDP) Management Plan (DOE-CBFO-01-3107) requires that spreadsheet validation or verification take place and that it be documented on a memorandum to the CBFO PDP Appointee. There is no explicit requirement that the Appointee actually read and review the memorandum. EPA will follow up with the CTAC QA on the second Observation during a future audit to determine conformance with the 1989 ASME NQA-1 standard, supplement 2S-1, paragraph 2.6.

If you have any questions regarding this QA audit report, please contact Lindsey Bender at (202) 343-9479 or [bender.lindsey@epa.gov](mailto:bender.lindsey@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Tom Peake". The signature is written in a cursive style with a long horizontal stroke at the end.

Tom Peake, Director  
Center for Waste Management and Regulations

Enclosure

cc: Electronic Distribution  
Joe Franco, CBFO  
Dennis Miehl, Acting Manager, CBFO QA  
Martin Navarrete, Acting Manager, CBFO QA  
Tim Hall, NMED  
Raymond Lee, EPA HQ  
Nick Stone, EPA Region6  
Alton Harris, DOE HQ  
Site Documents

# Audit Close Out Summary

## April 29, 2013

On April 8–29, 2013, EPA conducted a records audit of the CTAC Quality Assurance Program.

The EPA audit team evaluated the CTAC QA program relative to the requirements of Element No. 1, *Organization*, Element No. 2, *Quality Assurance Program*, Element No. 4, *Procurement Document Control*, Element No. 5, *Instruction, Procedures and Drawings*, Element No. 6, *Document Control*, Element No. 7, *Control of Purchased Items and Services*, Element No. 8, *Identification and Control of Items*, Element No. 10, *Inspection*, Element No. 11, *Test Control*, Element No. 16, *Corrective Action*, Element No. 17, *QA Records*, and Element No. 18, *Audits* of the 1989 ASME NQA-1 standard. The documents selected for EPA's audit sample showed that the CTAC QA Program continues to be executed in accordance with Element Nos. 1, 2, 4, 5, 6, 7, 8, 10, 11, 16, 17 and 18 of the 1989 ASME NQA-1 standard. EPA did not identify any nonconformances with respect to CTAC's QA Program relative to the requirements of the 1989 ASME NQA-1 standard elements listed above.

**Item for Follow-Up:** The 1989 ASME NQA-1 standard, supplement 2S-1, paragraph 2.6 requires that the "job performance of inspection and test personnel shall be reevaluated at periodic intervals not to exceed 3 years... Any person who has not performed inspection or testing activities in his qualified area for a period of 1 year shall be reevaluated by a redetermination of required capability in accordance with the requirements of para. 2.5 above." The QAPD, Revision 11, section 2.4.1, paragraph G, includes these requirements in full. Portage procedure PRC-3030, Revision 0, section 5.3, states, "There are no periodic requalification requirements."

EPA will follow up with CTAC QA during a future audit to determine conformance with the 1989 ASME NQA-1 standard, supplement 2S-1, paragraph 2.6.

**Observation:** There are instances when the 1989 ASME NQA-1 standard requires a review or evaluation and the applicable procedures specify to record a memorandum or an approval or acceptance. The review or evaluation is implicit, but not stated, in the procedures.

## Audit Close Out Summary

**April 29, 2013, [Revised June 11, 2013]**

On April 8-29, 2013, EPA conducted a records audit of the CTAC Quality Assurance Program.

The EPA audit team evaluated the CTAC QA program relative to the requirements of Element No. 1, *Organization*, Element No. 2, *Quality Assurance Program*, Element No. 4, *Procurement Document Control*, Element No. 5, *Instruction, Procedures and Drawings*, Element No. 6, *Document Control*, Element No. 7, *Control of Purchased Items and Services*, Element No. 8, *Identification and Control of Items*, Element No. 10, *Inspection*, Element No. 11, *Test Control*, Element No. 16, *Corrective Action*, Element No. 17, *QA Records*, Element No. 18, *Audits* of the 1989 ASME NQA-1 standard. EPA did not identify any nonconformances with respect to CTAC's QA Program relative to the requirements of the 1989 ASME NQA-1 standard elements listed above.

**Two Observations:** 1) There are instances when the 1989 ASME NQA-1 standard requires a review or evaluation and the applicable procedures specify to record a memorandum or an approval or acceptance. The review or evaluation is implicit, but not stated, in the procedures.

2) The 1989 ASME NQA-1 standard, supplement 2S-1, paragraph 2.6 requires that the "job performance of inspection and test personnel shall be reevaluated at periodic intervals not to exceed 3 years...any person who has not performed inspection or testing activities in his qualified area for a period of 1 year shall be reevaluated by a redetermination of required capability in accordance with the requirements of para. 2.5 above." The QAPD, Revision 11, section 2.4.1, paragraph G, includes these requirements in full. Portage procedure PRC-3030, Revision 0, section 5.3, states, "There are no periodic requalification requirements." [*Item 2 reclassified from "Item for Follow-Up" to an Observation, June 11, 2013*]. EPA will follow up with CTAC QA on Observation number 2, during a future audit to determine conformance with the 1989 ASME NQA-1 standard, supplement 2S-1, paragraph 2.6