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

JUN 13 2013



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

Subject: Closure of CAR 13-030 from CBFO Audit A-13-02, SRS/CCP

Dear Mr. Gulbransen:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of the documentation supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 13-030, which resulted from CBFO Audit A-13-02 of the Savannah River Site Central Characterization Program. The results of the verification indicate that the corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 13-030 is considered closed.

If you have any questions or comments concerning closure of CAR 13-030, please contact me at (575) 234-7491.

Sincerely,

[Handwritten signature]

Dennis S. Miehs
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

- J. Franco, CBFO *ED R. Joglekar, EPA ED
J. R. Stroble, CBFO ED S. Ghose, EPA ED
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T. Peake, EPA ED CBFO QA File
L. Bender, EPA ED CBFO M&RC
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CAR CONTINUATION SHEET

1. CAR No: 13-030

2. Activity No: A-13-02

3. Page 1 of 2

Evaluation for the closure of Corrective Action Report (CAR) 13-030:

CAR 13-030 was initiated after it was discovered that a condition identified during Audit A-13-02 had been incorrectly classified as an Observation. The condition involved the lack of inclusive dates for real-time radiography scans on associated batch data reports (BDRs) SR4RTR0196, SR4RTR0248 and SRSRTR0584.

Italicized text, taken verbatim from the CAP, is used to show the correlation between the corrective action and the method used for verification.

Reference: NWP letter CP:13:01224 dated June 6, 2013, Transmittal of the Documentation supporting Completion of Corrective Actions Associated with CBFO Corrective Action Report 13-030.

REMEDIAL ACTION(S)

"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 SRSRTR0584 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.*

Verification

Verified through review of the corrected BDRs noted above, which were submitted with the closure documentation.

INVESTIGATIVE ACTION(S)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. The review showed that, for all the 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. Due to the oversight, the SPM did not include April 12, 2011, as an examination date in the SPM checklist. As noted in the Remedial Action 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 no impact from the CAR condition."

Verification

The sample review of 50% by NWP is deemed more than adequate to determine the extent of the condition. Further, as noted in the remedial action section, all the BDRs have been corrected.

CAR CONTINUATION SHEET

1. CAR No: 13-030

2. Activity No: A-13-02

3. Page 2 of 2

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTION(S) TO PRECLUDE RECURRENCE

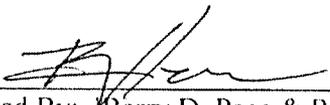
- a) *"As soon as the concern was raised during the SRS recertification audit, the CCP Certification Manager reminded the SPMs of the requirement to record the dates for each examination, in the appropriate blocks of the SPM checklist, for examinations lasting more than one day. As noted elsewhere in the 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 CCP-TP-001, to change "Date" blocks to "Dates(s)" to align with the requirement in Section 4.2.4.*

Verification

Reviewed CCP-TP-001, Revision 21 (effective 06/06/2013) and confirmed that the corrective action to revise the SPM checklist has been completed. Also verified completion documentation for assigned reading to communicate expectations for documenting RTR examination dates on SPM validation checklists.

CONCLUSION:

Based on the review of objective evidence submitted for CAR 13-030, it is recommended that the CAR be considered closed.


 Evaluation Performed By: Berry D. Pace & R. Allen

6-12-13
 Date