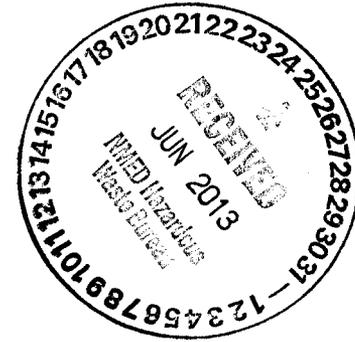




ENTERED

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



JUN 25 2013

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

Subject: Evaluation and Closure of the Corrective Actions Submitted in Response to CBFO
CAR 13-026

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) 13-026, which resulted
from CBFO Audit A-13-11, Central Characterization Program (CCP) Quality Assurance
Program. 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 13-026 is considered closed.

If you have any questions concerning the closure of CAR 13-026, please contact me at
(575) 234-7491.

Sincerely,

[Handwritten signature]

Dennis S. Miehl
Acting Director, Office of Quality Assurance

Enclosure

cc: w/enclosure

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

130625



## CAR CONTINUATION SHEET

1. CAR No: 13-026

2. Activity No: A-13-11

3. Page 2 of 2

- 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.*

**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.*

**Verification:**

Investigative actions were evaluated and found to be acceptable, as documented in CBFO letter CBFO:OQA:DM:MAG:13-1433:UFC 2300.00.

**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.*

**Verification:**

Copies of cover pages of PCLT and HLD examinations with added signature blocks for Level III personnel who are administering and grading the examinations were provided as evidence for completion of this corrective action. Supplemental documentation was provided as objective evidence of the certification and recognition of a contracted HLD Level III individual. The verification activities have determined that the associated corrective actions are a suitable approach to resolve the CAR condition and prevent further recurrences.

**ACCEPTANCE**

Based on the results of the review of the objective evidence included in the CAR 13-026 closure package, it is recommended that CAR 13-026 be closed.

*Katie Martin*

Verification Performed By: Katie Martin

*6/25/13*

Date

## CAR CONTINUATION SHEET

1. CAR No: 13-026

2. Activity No: A-13-11

3. Page 1 of 2

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) 13-026, 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:13:01238 UFC:2300.00, dated June 14, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification, 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.*

1. *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.*
2. *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.*

Verification:

Remedial actions were evaluated and found to be acceptable, as documented in CBFO letter CBFO:OQA:DM:MAG:13-1433:UFC 2300.00. A list of examinations that were not signed by the in-house Level III and Level III (L) personnel, with written attestation that they administered and graded these examinations, were provided as evidence for completion of this corrective action. Also, a list of examinations that were not signed by the contracted Level III personnel, including documentation confirming that the contracted Level III personnel who administered examinations but did not sign them were approved for the activity at the time of the examination, were provided as objective evidence. A review of a sample of affected qualification files for Pressure Change Leak Testing (PCLT) and Helium Leak Detection (HLD) Operators showed evidence that documentation has been added to the qualification files showing that the examinations were administered and graded by in-house and/or contracted Level III or Level III (L) personnel, as stated in the email provided as objective evidence. Supplemental documentation was provided to demonstrate the qualification and approval of activity for a contracted HLD Level III.

## 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.*