



ENTERED

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



July 18, 2013

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

Subject: Issuance of CAR 13-047 Identified During Audit A-13-21

Dear Mr. Gulbransen:

The Carlsbad Field Office (CBFO) performed Audit A-13-21, Central Characterization Program Intersite Shipment Transportation, on July 9-11, 2013. Enclosed is CBFO Corrective Action Report (CAR) 13-047 addressing the conditions adverse to quality identified during the audit regarding storage of Process Knowledge Records.

Please provide a documented response for the CAR, ensuring that the required actions indicated in Block 12 are addressed, including a schedule for completion. Please return your response to me on or before the due date identified in Block 14a.

If you have any questions concerning the issuance of CAR 13-047, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Acting Director, Office of Quality Assurance

Enclosure

cc: w/enclosure

D. Miehl, CBFO	*ED	S. Holmes, NMED	ED
J. R. Stroble, CBFO	ED	R. Maestas, NMED	ED
T. Reynolds, NWP/CCP	ED	C. Smith, NMED	ED
A. J. Fisher, NWP/CCP	ED	J. Harvill, CTAC	ED
V. Cannon, NWP/CCP	ED	R. Allen, CTAC	ED
M. Walker, NWP/CCP	ED	B. J. Verret, CTAC	ED
J. Carter, NWP/CCP	ED	K. Martin, CTAC	ED
W. Ledford, NWP/CCP	ED	P. Hinojos, CTAC	ED
J. Hoff, NWP/QA	ED	G. White, CTAC	ED
B. Allen, NWP/QA	ED	WIPP Operating Record	ED
M. Mullins, NWP/QA	ED	Site Documents	ED
S. Punchios, NWP/QA	ED	CBFO QA File	
J. Kieling, NMED	ED	CBFO M&RC	
T. Kliphuis, NMED	ED	*ED denotes electronic distribution	



CORRECTIVE ACTION REPORT

1. CAR No.: 13-047	2. Activity Report No.: A-13-21	3. Page 1 of 2
4. Controlling document: CCP-QP-008, CCP-TP-401	5. CBFO Assessment Team Leader: Martin P. Navarrete	
6. Responsible organization: NWP/NTPC/CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: A. J. Fisher	
8. Requirement that is involved: See Continuation Sheet.		
9. Condition Adverse to Quality (CAQ): See Continuation Sheet.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: RM05	13b. CAR Initiator: <u>Katie Martin</u> <small>(printed name)</small> Katie Martin	Date: 7/15/13
14a. Response due date: 8/15/13		
14b. Required corrective action completion date: N/A		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Martin P. Navarrete</u> <small>(printed name)</small> Martin P. Navarrete		Date: 7/18/13
b. CBFO Quality Assurance Director: <u>Martin P. Navarrete</u> <small>(printed name)</small> Martin P. Navarrete, Acting Dir.		Date: 7/18/13
16. Acceptance of Proposed Corrective Actions: _____ <small>(printed name)</small>		Date: _____
17. Acceptance of Corrective Action Completion: _____ <small>(printed name)</small>		Date: _____
18. Closure: _____ <small>(printed name)</small>		Date: _____

CAR CONTINUATION SHEET

1. CAR No: 13-047

2. Activity No: A-13-21

3. Page 2 of 2.

8. Requirement that is involved:

CCP-QP-008, Rev. 21, *CCP Records Management*, Step 4.1.1 states, "Prior to conducting a work activity: [A] Identify those documents that become records." and [C] "Identify records in the implementing procedures." And step 4.5.1 states, "Store, maintain, and protect completed QA records as follows: [A] In an Underwriter Laboratories-listed one-hour fire rated (or equivalent) container, or a container certified by a person competent in the technical field of fire protection. **OR** [B] Retain a copy in a location sufficiently remote from the original to preclude destruction as a result of a single event such as fire or natural disaster, **ALSO** [C] Provide adequate protection of the QA records within the storage location to minimize the risk of damage or loss from humidity, natural disasters, adverse weather conditions, mold or infestations of insects or rodents."

CCP-TP-401, Rev. 3, *CCP Process Knowledge Compilation for Preliminary Characterization*, Section 5.1 states that "Records generated during the performance of this procedure are submitted to be managed as AK by the certified waste characterization program at the receiving site." Section 5.1.1 then identifies the records.

The NWP/CCP/NTPC/Inter-site Shipping RIDS Item 8a requires the PK records to be submitted to CCP records for storage.

9. Condition Adverse to Quality (CAQ):

The audit team was unable to verify that the PK records identified and generated during the performance of CCP-TP-401, Rev. 2, *CCP Process Knowledge Compilation for Preliminary Characterization*, Section 5.0 are being maintained, stored, controlled, and protected in secure locations or fire-rated containers as completed QA records in accordance with CCP-QP-008, step 4.5.1.

In addition, the audit team was unable to verify that the records generated during the performance of CCP-TP-401, Rev. 2, and identified in Section 5.1.1, are being "submitted to be managed as AK by the certified waste characterization program at the receiving site", as stated in CCP-TP-401, Section 5.1.

There is a conflict between CCP-TP-401, section 5.1 and the NWP/CCP/NTPC/Inter-site Shipping RIDS Item 8a, CCP/Inter-site – PK Documentation. CCP-TP-401, Section 5.1 requires the PK records to be forwarded to the sites to be managed as AK, but the Shipping RIDS Item 8a requires the PK records to be submitted to CCP Records for storage.