



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

ENTERED



AUG 6 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 of the CAP for CBFO CAR 13-033 from Surveillance S-13-23, Concern Classification Evaluation, Effected by CBFO CAR 13-033

Dear Mr. Gulbransen:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 13-033. The results of the review indicate that the CAP is acceptable. In this instance, information indicates that National TRU Program Certification had already taken corrective action prior to the issuance of the CAR. Therefore, please provide notification and documentation supporting closure of this CAR so that verification activities may be performed.

If you have any questions concerning the evaluation, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

J. Franco, CBFO	*ED	R. Joglekar, EPA	ED
M. Navarrete, CBFO	ED	S. Ghose, EPA	ED
J. R. Stroble, CBFO	ED	R. Lee, EPA	ED
T. Reynolds, NWP	ED	J. Kieling, NMED	ED
V. Cannon, NWP	ED	T. Kliphuis, NMED	ED
A. J. Fisher, NWP	ED	S. Holmes, NMED	ED
M. Walker, NWP	ED	R. Maestas, NMED	ED
W. Ledford, NWP	ED	C. Smith, NMED	ED
M. Sensibaugh, NWP	ED	J. Harvill, CTAC	ED
M. Percy, NWP	ED	R. Allen, CTAC	ED
J. Carter, NWP	ED	B. Pace, CTAC	ED
J. Hoff, NWP	ED	P. Hinojos, CTAC	ED
B. Allen, NWP	ED	G. White, CTAC	ED
S. Punchios, NWP	ED	Site Documents	ED
T. Peake, EPA	ED	WIPP Operating Record	ED
L. Bender, EPA	ED	CBFO QA File	
E. Felcorn, EPA	ED	CBFO M&RC	

*ED denotes electronic distribution



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Block # 16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 13-033. The CAP was submitted via Nuclear Waste Partnership LLC letter CP:13:01343, dated August 1, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification (NTPC), Central Characterization Program, to Mr. Dennis S. Miehl, Acting Director, Office of Quality Assurance.

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 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.

For reasons discussed in the Impact section of this Corrective Action Plan, NTPC has determined that no Remedial Actions are required for the CAR condition.

Evaluation:

The decision by NTPC to take no remedial actions in this instance is appropriate. As noted in the Impact section of the CAP, NTPC revised the contact-handled (CH) waste Site Project Manager (SPM) qualification card (SPM-01) on February 27, 2012, to add the following statement: "Additionally, once this qualification card is complete, the SPM will be qualified to perform SPM reviews of Headspace Gas (HSG) batch data reports, regardless of the radiological determination of the waste." The action taken on February 27, 2012 satisfies the remedial action required by this CAR.

INVESTIGATIVE ACTION(S)**Extent**

In addition to the BDR cited in the CAR condition, the same individual also performed SPM review of the following RH HSG BDRs:

- *ECL 10017G and ECL 10017M (INL)*
- *ECL 10026G and ECL 10026M (ORNL)*
- *ECL 10035G and ECL 10035M (ORNL)*
- *ECL 10037G and ECL 10037M (BAPL)*
- *ECL 11004G and ECL 11004M (SRS)*

Impact

NTPC performed an evaluation of this condition when it was first reported as an Observation in the audit report for A-12-04 (the evaluation was documented on May 17, 2012):

Follow-up Evaluation/Final Determination: The requirements for HSG sampling are exactly the same for CH and RH. In the area of HSG sampling, an SPM who is qualified for CH is also qualified for RH. In order to make this explicit in our documentation, the CH SPM qualification

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card (SPM-01) was revised on February 27, 2012, to add the following statement: "Additionally, once this qualification card is complete, the SPM will be qualified to perform SPM reviews of Headspace Gas (HSG) batch data reports, regardless of the radiological determination of the waste."

For the above reasons, there was no technical impact from the CAR condition. There is the further consideration that on March 13, 2013, the Permit was modified to remove chemical sampling from the NTPC program. One of the actions taken by NTPC in response to the Permit modification was to revise qualification card SPM-01 on June 21, 2013, to remove the statement about the qualification of SPMs to review HSG BDRs, regardless of the radiological determination of the waste.

Evaluation:

The investigative actions described above provide reasonable assurance that all measures were taken to appropriately identify both the extent and impact of the condition and the necessary corrective actions to preclude recurrence.

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTION(S) TO PRECLUDE RECURRENCE

As discussed in the Impact section of this Corrective Action Plan, NTPC took the following action on February 27, 2012:

- a) NTPC revised the CH SPM qualification card (SPM-01) to add the following statement: "Additionally, once this qualification card is complete, the SPM will be qualified to perform SPM reviews of Headspace Gas (HSG) batch data reports, regardless of the radiological determination of the waste."*

Evaluation:

The action taken to revise the qualification card as described is commensurate with the results concluded from the investigative actions and is deemed appropriate.

ACCEPTANCE

The results of the evaluation of the CAP indicate that NTPC has adequately evaluated the extent and impact of the CAR condition along with the appropriate identification of the corrective action to reduce the likelihood of recurrence. Therefore, it is recommended that the CAP for CAR 13-033 be approved.



Evaluation Performed By: Berry D. Pace

8/2/13

Date: