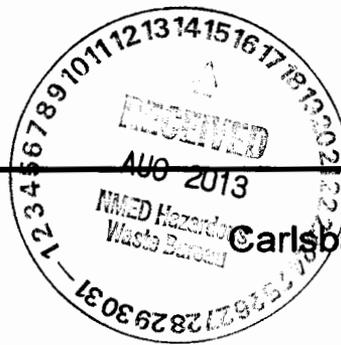


United States Government

memorandum



ENTERED

Department of Energy

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: August 15, 2013

REPLY TO
ATTN OF: CBFO:OQA:MPN:KJ:13-2016:UFC 2300.00

SUBJECT: Issuance of CAR 13-037 Resulting from CBFO Surveillance S-13-23

TO: Mr. Benjamine Roberts, DOE-ID

The Carlsbad Field Office (CBFO) performed Surveillance S-13-23 in Carlsbad, New Mexico, May 7-9, 2013. This surveillance was conducted, in part, as an extent-of-condition review to address CBFO Corrective Action Report (CAR) 13-023, which identified a condition that was incorrectly classified. Surveillance S-13-23 was performed to determine if similar instances of incorrect classification had occurred elsewhere.

The surveillance identified four other instances of incorrectly classified concerns that should have been reported as conditions adverse to quality. These four instances occurred during CBFO Recertification Audit A-13-01 of the Advanced Mixed Waste Treatment Project, conducted October 15-18, 2012, as documented in the attached CAR.

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, please contact me at (575) 234-7483.

Martin P. Navarrete
Acting Director, Office of Quality Assurance

Attachment

cc: w/attachment			
O. Vincent, CBFO	* ED	S. Ghose, EPA	ED
D. Miehl, CBFO	ED	R. Lee, EPA	ED
J. R. Stroble, CBFO	ED	J. Kieling, NMED	ED
M. Pinzel, CBFO	ED	T. Kliphuis, NMED	ED
N. Castaneda, CBFO	ED	S. Holmes, NMED	ED
J. Cooper, DOE-ID	ED	R. Maestas, NMED	ED
J. Wells, DOE-ID	ED	C. Smith, NMED	ED
T. Jenkins, DOE-ID	ED	J. Harvill, CTAC	ED
D. Haar, AMWTP	ED	R. Allen, CTAC	ED
G. Byram, AMWTP	ED	B. Pace, CTAC	ED
G. Tedford, AMWTP	ED	P. Hinojos, CTAC	ED
E. Schweinsberg, AMWTP	ED	G. White, CTAC	ED
A. Morse, AMWTP	ED	Site Documents	ED
T. Peake, EPA	ED	WIPP Operating Record	ED
L. Bender, EPA	ED	CBFO QA File	
E. Feltcorn, EPA	ED	CBFO M&RC	
R. Joglekar, EPA	ED	*ED denotes electronic distribution	

130818



CORRECTIVE ACTION REPORT

1. CAR No.: 13-037	2. Activity Report No.: S-13-23	3. Page 1 of 2
4. Controlling document: See Block 8	5. CBFO Assessment Team Leader: M. Navarrete	
6. Responsible organization: AMWTP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: A. Morse	
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: Item #1 WP-05 Item #2 WP-05 Item #3 WP-01 Item #4 TQ-03	13b. CAR Initiator: _____ Date: _____ (printed name) <u>Berry D. Pace</u>	
14a. Response due date: <u>SEPT 12, 13</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): _____ (printed name) <u>Martin Navarrete</u> <u>MARTIN NAVARRETE</u>		Date: <u>8-15-13</u>
b. CBFO Quality Assurance Director: _____ (printed name) <u>Martin Navarrete</u> <u>MARTIN NAVARRETE</u>		Date: <u>8-15-13</u>
16. Acceptance of Proposed Corrective Actions: _____ (printed name) _____		Date: _____
17. Acceptance of Corrective Action Completion: _____ (printed name) _____		Date: _____
18. Closure: _____ (printed name) _____		Date: _____

CAR CONTINUATION SHEET

1. CAR No: 13-037

2. Activity No: S-13-23

3. Page 2 of 2.

Block 8 – Requirement(s) that is Involved:

1. MP-Q&SI-5.4, Section 3.8.3 states: *QA verifies the disposition of the NCR and all associated documents are complete.*
2. MP-M&IA-17.1, Rev. 11, Section 3.3.8 states: *Responsible managers shall review completed Management Assessment Reports (MARs) no later than 10 calendar days from receipt of notifications, irrespective of required corrective action, nonconformance disposition, or needed improvement.*
3. MP-Q&SI-5.6, Section 2.0 states: *The QA Manager is responsible for review and concurrence with classification (Quality Class 1, 2 or 3) of structures, systems and components in the Maintenance Management System. Classifications are documented on a Notice to Code Spares (Form-1448) including QA review.*
4. MP-RTQP-14.4, Section 3.5.1 states: *Technical staff personnel who provide support to AMWTP nuclear operations are identified in MP-RTQP-14.20 Training Implementation Matrix, Appendix A, DOE Order 426.2 Positions.*

MP-RTQP-14.4, Section 3.5.1.1 states: *This list also identifies the staff that has a direct impact on employee, facility, or public safety, as required by MP-RTQP-14.20, MP-RTQP-14.4, Section 3.10.2, MP-RTQP-14.16, Section 3.1.1 (NOTE) and MP-RTQP-14.16, Section 3.1.1.1.1.*

Block 9 – Condition(s) Adverse to Quality:

1. During the review of Nonconformance Report (NCR) 68515, Supercompactor Glovebox Glass Cracked by Tipping Material, the audit team noted the Quality Assurance (QA) verification completion was done on 1/25/12. Attached to the NCR in Track Wise was a Temporary Physical Change Record (TPC-0216), Form-1508. TPC-0216 was completed through the Installation Approval Section (page 2 of 6); however, the subsequent sections of the form for documenting the completion of installation were incomplete. Also attached to the NCR in Track Wise was Work Order #396618, which completed the temporary installation on 1/25/12. QA did not verify that TPC-0216 was completed prior to the closure of NCR 68515.
2. Review of completed Management Assessment Reports in Track Wise indicated that one management review was completed later than 10 days after the Track Wise notification was provided.
3. The AMWTP Quality Assurance (QA) program did not have a current Delegation of Authority Letter. QA personnel other than the QA Manager have been performing review and concurrence of classifications of structures, systems, and components in the Maintenance Management System, with no current delegation of authority documentation. The only documentation available was Delegation of Authority Letter C-2009-0382, dated 8/19/2009. The QA Manager and organization structure have changed since that letter was issued.
4. The WIPP Training Requirements Implementation Matrix, LST-RTQP-03-IM, Rev. 0, is not referenced in AMWTP training program procedures. Training program procedures reference Training Implementation Matrix MP-RTQP-14.20, which does not address WIPP Waste Analysis Plan training requirements.