



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

AUG 15 2013



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

Subject: Review and Verification of the Corrective Actions Submitted in Response to and Supporting Closure of CBFO CAR 13-033 Resulting from Surveillance S-13-23

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) 13-033, which resulted from CBFO Surveillance S-13-23, Concern Classification Evaluation, effected by CAR 13-023. 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 13-033 is considered closed.

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

Sincerely,

Dennis S. Miehl
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

J. Franco, CBFO	*ED	S. Ghose, EPA	ED
O. Vincent, CBFO	ED	R. Lee, EPA	ED
M. Navarrete, CBFO	ED	J. Kieling, NMED	ED
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A. J. Fisher, NWP	ED	C. Smith, NMED	ED
M. Walker, NWP	ED	J. Harvill, CTAC	ED
W. Ledford, NWP	ED	R. Allen, CTAC	ED
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M. Percy, NWP	ED	K. Martin, CTAC	ED
J. Carter, NWP	ED	R. Castillo, CTAC	ED
J. Hoff, NWP	ED	P. Hinojos, CTAC	ED
B. Allen, NWP	ED	G. White, CTAC	ED
S. Punchios, NWP	ED	WIPP Operating Record	ED
T. Peake, EPA	ED	CBFO QA File	
L. Bender, EPA	ED	CBFO M&RC	
E. Feltcorn, EPA	ED	*ED denotes electronic distribution	
R. Joglekar, EPA	ED		



CAR CONTINUATION SHEET

1. CAR No: 13-033

2. Activity No: S-13-23

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) 13-033, identified during CBFO Surveillance S-13-23, Concern Classification Evaluation, effected by CAR 13-023. The closure documentation was submitted via Nuclear Waste Partnership LLC (NWP) letter CP:13:01355 UFC:2300.00, dated August 7, 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

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.

Verification:

As noted in the CAP approval (CBFO:OQA;DSM:MAG:13-1495:UFC 2300.00), the decision not to perform remedial actions was deemed appropriate.

INVESTIGATIVE ACTIONS**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 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:

CAR CONTINUATION SHEET

1. CAR No: 13-033

2. Activity No: S-13-23

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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.

Verification:

As noted in the CAP approval (CBFO:OQA:DSM:MAG:13-1495:UFC 2300.00), the investigative actions to determine the extent and impact of the CAR condition were deemed appropriate.

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

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

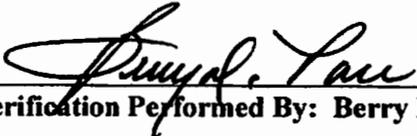
- a) *NTPC revised the CH SPM qualification card (SPM-01) to add the following statement:
"Additionally, once this qualification card is complete, the SPM will be qualified to perform SPM reviews of Headspace Gas (HSG) batch data reports, regardless of the radiological determination of the waste."*

Evaluation:

A review of the revised versions of the SPM qualification card (SPM-01) submitted as evidence of corrective action completion determined that the actions were fulfilled, therefore correcting the CAR condition.

ACCEPTANCE

Based on the results of the review of the objective evidence included in the CAR 13-033 closure package, it is recommended that CAR 13-033 be closed.


Verification Performed By: **Berry D. Pace**


Date