



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

SEP 16 2013

ENTERED



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 13-047

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) 13-047, which resulted from CBFO Audit A-13-21, Central Characterization Program Intersite Shipment Transportation. The results of the verification are documented on the enclosed CAR Continuation Sheets and indicate that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 13-047 is considered closed.

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

Sincerely,

Martin P. Navarrete
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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J. Hoff, NWP/QA	ED	G. White, CTAC	ED
B. Allen, NWP/QA	ED	Site Documents	ED
S. Punchios, NWP/QA	ED	CBFO QA File	
J. Kieling, NMED	ED	CBFO M&RC	

*ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 13-047

2. Activity No: A-13-21

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) 13-047, identified during CBFO Audit A-13-21, Central Characterization Program Intersite Shipment Transportation. The closure documentation was submitted via Nuclear Waste Partnership LLC (NWP) letter CP:13:01384 UFC:2300.00, dated August 29, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification, to Mr. Martin P. Navarrete, 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.

a) *PK records have been sent to the Project Office for transfer to NTPC Records.*

Historical source documents collected in support of PK will become part of the AK documentation for the affected waste streams. Since they will become part of AK, these historical source documents will not be turned in as part of PK. The revision to CCP-TP-401 listed in the Actions to Prevent Recurrence section of this Corrective Action Plan will address the way in which historical source documents will be managed.

Verification:

Remedial actions were evaluated and found to be acceptable, as documented in CBFO letter CBFO:OQA:MPN:MAG:13-2022:UFC 2300.00. The evaluation verified that PK records from CCP-PK-ANLE-001, Rev. 2, *CCP Process Knowledge Summary Report, CCP-PK-SNL-001, Rev. 1, Central Characterization Project Process Knowledge Summary Report For Lovelace Respiratory Research Institute Contact-Handled Transuranic Waste Stored at Sandia National Laboratories/New Mexico*, and CCP-PK-SNL-002, Rev. 1, *Central Characterization Project Process Knowledge Summary Report For Sandia National Laboratories/New Mexico Hot Cell Facility Contact Handled Transuranic Waste (Debris)*, have been received and processed by NTPC Records.

INVESTIGATIVE ACTIONS

Extent

The governing procedure, CCP-TP-401, was revised on September 22, 2011, as Revision 2, to direct that records generated during performance of the procedure be submitted to be managed as AK by the certified waste characterization program at the receiving site. PK records generated since the issuance of Revision 2 of CCP-TP-401 represent the extent of the CAR condition.

NTPC management does not anticipate the need to prepare any additional PK documentation for the foreseeable future. Any such documentation prepared would be managed in accordance with the revision to CCP-TP-401 currently in the review and approval cycle (see the Actions to Prevent Recurrence section of this Corrective Action Plan).

CAR CONTINUATION SHEET

1. CAR No: 13-047

2. Activity No: A-13-21

3. Page 2 of 2

Impact

The information in PK records is essentially duplicated in the AK documentation for the waste. In addition, the PK records are being turned over to NTPC records. There is no technical impact from the CAR condition.

Verification:

Investigative actions were evaluated and found to be acceptable, as documented in CBFO letter CBFO:OQA:MPN:MAG:13-2022:UFC 2300.00.

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

- a) *NTPC will revise CCP-TP-401 to state that records generated by the procedure are to be submitted to NTPC Records in accordance with CCP-QP-008. Note that historical source documents will flow into NRPC [sic] Records as part of AK, not as PK.*

The revision to CCP-TP-401 will resolve the conflict with the NWP/NTPC/Inter-site Shipping RIDS.

Anticipated Completion Date: September 18, 2013

Verification:

The evaluation verified that CCP-TP-401, Rev. 4, *CCP Process Knowledge Compilation for Preliminary Characterization*, has been revised to state that records generated by the procedure are to be submitted to NTPC Records in accordance with CCP-QP-008, *CCP Records Management*. This procedure has also been revised to state that historical source documents will flow into CCP-TP-005, *CCP Acceptable Knowledge Documentation*.

ACCEPTANCE

Based on the results of the evaluation of the objective evidence included in the CAR 13-047 closure package, it is recommended that CAR 13-047 be closed.

Katie Martin

Verification Performed By: Katie Martin

9-4-2013

Date