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

OCT 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 13-034 Resulting from Surveillance S-13-23, Concern Classification Evaluation

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) 13-034, 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 13-034 is considered closed.

If you have questions concerning closure of CAR 13-034, 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
J. R. Stroble, CBFO	ED	R. Lee, EPA	ED
O. Vincent, CBFO	ED	J. Kieling, NMED	ED
M. Navarrete, CBFO	ED	T. Kliphuis, NMED	ED
T. Reynolds, NWP/CCP	ED	S. Holmes, NMED	ED
V. Cannon, NWP/CCP	ED	R. Maestas, NMED	ED
A. J. Fisher, NWP/CCP	ED	C. Smith, NMED	ED
M. Walker, NWP/CCP	ED	J. Harvill, CTAC	ED
W. Ledford, NWP/CCP	ED	R. Allen, CTAC	ED
J. Carter, NWP/CCP	ED	B. Pace, CTAC	ED
J. Hoff, NWP/QA	ED	P. Hinojos, CTAC	ED
B. Allen, NWP/QA	ED	G. White, CTAC	ED
S. Punchios, NWP/QA	ED	CBFO QA File	
S. Escareno-Soto, CBFO	ED	CBFO M&RC	
L. Bender, EPA	ED	*ED denotes electronic distribution	



CAR CONTINUATION SHEET

1. CAR No: 13-034

2. Activity No: S-13-23

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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) 13-034, 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:13:01414 UFC:2300.00, dated September 30, 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

1. *NTPC wrote an NCR (NCR-RL-0916-12) with a use as-is disposition for the out-of-order numbering sequence.*
2. *The container types and shipping categories in the WDS container data reports now agree with the data on the WDS Master Template spreadsheet, for all three containers listed in the concern.*
3. *All four memoranda were corrected to show headspace gas sampling in the subject lines, on July 26, 2012. The content of each memorandum makes it clear that they were written for headspace gas and not for solids. The errors occurred in the subject lines only, due to personnel inattention to detail.*
4. *A justification has been recorded in both SPM NDA Project Level Validation Checklists and Summaries, for answering Question 19 as "N/A." In both cases, U-235 was not present in the assay.*
5. *A mark-up of CCP-AK-SNL-500, addressing the disposition of container C980313 and adding DRI002 as a source document, was provided to Document Services as a freeze file item on August 15, 2012. For reasons provided elsewhere in this Corrective Action Plan (close-out audit, shipments complete, lack of funding), freeze file items associated with the Sandia scope were retained but not incorporated.*
6. *The SPM numbered the single added page as "SPM-01" on August 14, 2012.*
7. *In response to the above conditions, NTPC prepared Case Study 5 for the organization's CCP-100 CONOPs training program. Case Study 5, Procedure Fillable Forms, issued in October 2012, addresses the specific problems with the ITR form and covers what should have been done to correct them.*
The ITR checklist itself was corrected on August 14, 2012, and the corrected page was inserted into BDR SNHSG1102 on August 16, 2012.
8. *Documentation in the BDR lists the same min/max thermometer (XC0680) for two different and unrelated activities: 1) the 72-hour equilibrium time, and 2) shipment of the samples to INL for analysis. The only correction ever needed to the BDR package was the addition of manual temperature recorder XC0855 to the Sample Container Data Form, and this correction was made on August 14, 2012.*
9. *The entry was corrected on August 14, 2012, and the incorrect Sample Container Data Form in BDR SNHSG1102 was superseded with the corrected page on August 16, 2012.*
10. *NTPC issued NCR-RHANL-1522-12 for the use of the ITR checklist instead of the SPM checklist. The disposition of the NCR was for the SPM to re-perform the project-level review using the correct form, supersede the incorrect attachment, and insert the correct attachment in the BDR. The SPM checklist was completed on August 28, 2012, and was inserted into the BDR on the same day.*
11. *On August 30, 2012, NTPC wrote NCR-RHANL-1523-12, addressing the SPM's failure to complete Question 3 of the SPM checklist for BDR RHANLVE100015. In accordance with the NCR disposition, the SPM checklist was superseded with a corrected copy answering all questions.*

CAR CONTINUATION SHEET

1. CAR No: 13-034

2. Activity No: S-13-23

3. Page 2 of 2

Verification:

As noted in the CAP approval (CBFO:OQA:DSM:MAG:13-2011:UFC 2300.00), the remedial actions taken were deemed appropriate.

INVESTIGATIVE ACTIONS

Extent

The conditions were primarily isolated examples of inattention to detail that were recognized as such at the time the individual audits were performed.

Impact

Because remedial actions were taken for those concerns requiring such actions, there is no impact from the reported concerns.

Concern 7.0 described a situation where an RTR operator identified a battery as part of the container contents, but batteries were not identified as waste in the AK summary waste description. NTPC verified at the time that there was no technical impact, because the appropriate hazardous waste number for the batteries had been assigned to the waste. On August 1, 2013, NTPC received CBFO CAR 13-051, identifying a similar situation where, depending on the type of battery, the assignment of additional hazardous waste numbers might be necessary (the batteries were found to be non-hazardous). NTPC actions in response to CBFO CAR 13-051 are listed in the Actions to Prevent Recurrence section of this Corrective Action Plan, since they are the same actions necessary for programmatic resolution of Concern 7.0.

Verification:

As noted in the CAP approval (CBFO:OQA:DSM:MAG:13-2011:UFC 2300.00), the investigative actions for extent and impact were deemed appropriate.

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

1. NTPC will develop a list of items that are identifiable during RTR, and which could contain hazardous constituents. NTPC will revise CCP-TP-053 to include this list, with instruction that RTR operators are to initiate an NCR whenever any of these items are reported to be present in the waste stream, and the associated AK Summary Report does not explicitly identify the items in the waste stream description.
2. NTPC will brief RTR operators on the revised requirements to ensure consistent application across the NTPC scope of work.

Verification:

A review of the evidence submitted for closure concluded that both the remedial actions and actions to preclude recurrence have been fulfilled.

ACCEPTANCE

Based on the results of the review of the objective evidence included in the CAR 13-034 closure package, it is recommended that CAR 13-034 be closed.


Verification Performed By: Berry D. Pace

Date

~~10/17/13~~ 10/21/13
BDP.