

OCT 22 2013

Mr. D.E. Gulbransen

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cc: w/enclosure

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CAR CONTINUATION SHEET

1. CAR No: 13-051	2. Activity No: A-13-23	3. Page 1 of 1
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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) 13-051, identified during CBFO Audit A-13-23, Los Alamos National Laboratory Central Characterization Program TRU Waste Characterization and Certification Activities. The closure documentation was submitted via Nuclear Waste Partnership LLC (NWP) letter CP:13:01415 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.

The approved CAP submitted by NWP National TRU Program Certification (NTPC) identified the following actions. 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. *The AK Expert confirmed that the batteries were non-hazardous, so the question of hazardous waste numbers (existing or needing to be added) does not apply to the CAR condition.*
2. *NTPC issued Standing Order CCP-SO-105 providing direction to RTR personnel that if any of the potentially-hazardous wastes in the list are found present during RTR, but are not explicitly called out in the waste stream description in AK, then an NCR must be written to allow the AK Expert to determine whether hazardous waste numbers need to be assigned.*

Verification:

1. Verified through review of acceptable knowledge (AK) source document number C013 that the batteries were non-hazardous and did not require the assignment of hazardous waste numbers.
2. Verified through review of Standing Order CCP-SO-105, that direction to real-time radiography (RTR) personnel is given and that if any of the potentially hazardous wastes in the list are found present during RTR, but are not explicitly called out in the waste stream description in AK, then a nonconformance report (NCR) must be written to allow the AK Expert to determine whether hazardous waste numbers need to be assigned.

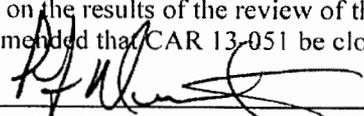
ACTIONS TO PRECLUDE RECURRENCE:

3. *NTPC has developed a list of items that are identifiable during RTR, and which could contain hazardous constituents. NTPC is revising CCP-TP-053 and CCP-TP-508 to include this list, to ensure that RTR operators 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.*
4. *NTPC will brief RTR operators on the revised requirements to ensure consistent application across the NTPC scope of work.*

Verification:

3. Verified through review of CCP-TP-053, Rev. 14, and CCP-TP-508, Rev. 9, that the revised procedures include a list of potential hazardous waste identifiable by radiography, along with steps to initiate an NCR.
4. Verified through review of briefing documentation provided to RTR Operators on the revised requirements for writing NCRs for potentially hazardous items found during RTR was documented on CCP training rosters.

Based on the results of the review of the objective evidence included in the CAR 13-051 closure package, it is recommended that CAR 13-051 be closed.


 Verification Performed By: **Per Martinez**

10/17/13
 Date