



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

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NMED
 Hazardous Waste Bureau

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

Subject: Review and Verification of the Corrective Actions Submitted in Response to and Supporting Closure of CBFO CAR 14-006

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) 14-006, which resulted from CBFO Audit A-14-04 of the Savannah River Site Central Characterization Program TRU Waste Characterization and Certification Activities. 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 14-006 is considered closed.

If you have any questions concerning the closure of CAR 14-006, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

M. Brown, CBFO	* ED	T. Peake, EPA	ED
J.R. Stroble, CBFO	ED	L. Bender, EPA	ED
M. Navarrete, CBFO	ED	E. Felcorn, EPA	ED
T. Morgan, CBFO	ED	R. Joglekar, EPA	ED
N. Castaneda, CBFO	ED	S. Ghose, EPA	ED
D. Moody, DOE-SR	ED	R. Lee, EPA	ED
H. Crape, DOE-SR	ED	J. Kielling, NMED	ED
F. Sharif, NWP	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
I. Joo, NWP/CCP	ED	V. Daub, CTAC	ED
M. Walker, NWP/CCP	ED	R. Allen, CTAC	ED
W. Ledford, NWP/CCP	ED	B. Pace, CTAC	ED
M. Percy, NWP/CCP	ED	P. Hinojos, CTAC	ED
J. Carter, NWP/CCP	ED	G. White, CTAC	ED
J. Hoff, NWP/QA	ED	Site Documents	ED
B. Allen, NWP/QA	ED	CBFO QA File	
S. Punchios, NWP/QA	ED	CBFO M&RC	
S. Escareno-Soto, NWP/QA	ED	*ED denotes electronic distribution	



CAR CONTINUATION SHEET

1. CAR No: 14-006

2. Activity No: A-14-04

3. Page 1 of 3

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) 14-006, identified during CBFO Audit A-14-04, Savannah River Site Central Characterization Program TRU Waste Characterization and Certification Activities. The closure documentation was submitted via Nuclear Waste Partnership LLC (NWP) letter CP:13:01589 UFC:2300.00, dated December 16, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification, to Mr. Dennis S. Michls, 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:

- a) *NTPC has confirmed that, with one exception, Visual Examination Experts (VEEs) have been assigned for CH and RH VE operations throughout the complex and current appointment letters are available in NTPC Training. The single exception was discovered at INTEC, where VE has historically been conducted at two facilities: VEEs have been appointed for facility CPP-659, where most of the VE is now conducted, but not for facility CPP-666, which has not been used since 2012 (but will be used in the future).*
- b) *The two VE operators who performed VE at CPP-666 are the same two operators appointed at VEEs at CPP-659. These two VE operators have now been appointed as VEEs for CPP-666.*

Verification:

Verified the appointment of VEEs for facility CPP-666 at Idaho Nuclear Technology and Engineering Center (INTEC) per email dated Tuesday, December 10, 2013, by Mr. Rich Kantrowitz, Site Project Manager.

INVESTIGATIVE ACTIONS**Extent**

As noted in the Remedial Action section of this Corrective Action Plan, the extent is limited to the condition described in the CAR and VE at CPP-666 [INTEC] in 2012.

Impact

NTPC has confirmed that no waste received or awaiting shipment from SRS is related to this waste stream. The waste stream has not been reviewed through the U.S. Environmental Protection Agency Tier 1 approval process and is not eligible to be shipped to WIPP.

The VE operators who performed the characterization were provided the briefing on the Acceptable Knowledge Summary Report of the waste stream. The VE operators did not have any questions about the VE of the three sealed sources that would have required them to consult a VEE. NTPC Training discovered that the VEE had not been appointed to the position prior the work being performed. After ensuring that the VEE had all required training prior to the VE evolution, the LOQI was updated (but only after the work had been performed). The newly-appointed VEE was one of the VE operators who performed VE on the sealed sources.

For CPP-666, the two VE operators that performed VE are the same two operators appointed as VEEs for CPP-659. Both operators had been briefed on the AK for the VE performed in CPP-666 at the time they did the work, and have now been appointed at VEEs for the facility.

CAR CONTINUATION SHEET

1. CAR No: 14-006

2. Activity No: A-14-04

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For the above reasons, there was no technical impact from the CAR condition or the lack of an appointed VEE for CPP-666 at INTEC.

Verification:

As indicated in the acceptance of the CAP (CBFO:OQA:DSM:MAG:13-2324:UFC 2300.00), the investigative actions, including extent and impact, were determined to be appropriate and acceptable.

ROOT CAUSE DETERMINATION

For day-to-day activities at host locations, NTPC characterization teams are fully supported by the infrastructure and resources needed to ensure that all requirements are met. In this case, the activity was conducted over the course of a single day, using resources brought in from other host locations to work on a very small waste stream consisting of three sealed sources. NTPC was focused on those who would actually be performing the work, and properly verified that VE operator qualifications were current per the List of Qualified Individuals (LOQI). However, NTPC failed to ensure that resources were in place to meet requirements at the secondary level: i.e., the availability of a VEE for the scope of work to be performed. The SRS VEE usually assigned to the facility did not participate in the evolution and had not been briefed on the AK Summary Report. The fact that the VEE is not required to actually perform the work or sign the BDR may have contributed to the CAR condition.

At the time when a properly-briefed VEE was added to the LOQI after VE of the sealed sources was completed, NTPC did not report as a deficiency the fact that the SRS VEE usually assigned to the facility had not been briefed on AK. This was because there was no consensus within NTPC that VEEs had to be briefed on each applicable AK. It was not until after the problem had been identified during the audit that NTPC met with a Senior Technical Advisor in the Regulatory Environmental Services organization and received a definitive determination. At the time, NTPC considered that it was simply replacing one acceptable VEE with a preferred VEE.

CCP-PO-005, CCP Conduct of Operations, Section 4.1, currently requires that the Vendor Project Manager (VPM) perform a daily verification that personnel are qualified to perform their assigned duties by reviewing the current LOQI for the specific location. CCP-PO-005 does not currently require that the VPM verify the availability of a VEE to support planned VE activities: had a check of this nature been part of their LOQI reviews, the CAR condition would not have materialized. These same controls, had they been in place at the time VE was performed at CPP-666 in 2012, would have ensured that a VEE would have been appointed for the work. As it was, the failure to appoint a VEE for CPP-666 was due to lack of attention to detail by management.

Verification:

As indicated in the acceptance of the CAP (CBFO:OQA:DSM:MAG:13-2324:UFC 2300.00), the root cause determination was determined to be appropriate and acceptable.

ACTIONS TO PRECLUDE RECURRENCE:

- a) *NTPC has issued Standing Order CCP-SO-108 to revise CCP-PO-005 to include a requirement for the VPM to verify that a VEE is shown as available on the LOQI, for the facility where VE will be performed, before the work is performed, and that the VEE has been briefed on the applicable AK. The Standing Order will remain in force until CCP-PO-005 is revised to incorporate it.*

CAR CONTINUATION SHEET

1. CAR No: 14-006

2. Activity No: A-14-04

3. Page 1 of 3

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1. CAR No: 14-006

2. Activity No: A-14-04

3. Page 2 of 3

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- a) *NTPC has issued Standing Order CCP-SO-108 to revise CCP-PO-005 to include a requirement for the VPM to verify that a VEE is shown as available on the LOQI, for the facility where VE will be performed, before the work is performed, and that the VEE has been briefed on the applicable AK. The Standing Order will remain in force until CCP-PO-005 is revised to incorporate it.*

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b) The LOQIs have historically denoted the VEEs for each facility. In response to this CAR, the LOQIs have now been enhanced to make it easier for VPMS to check that a VEE has been appointed to the facility where VE activities will be performed, and that the VEE has been briefed on the applicable AK.

Verification:

The following evidence was reviewed to confirm the completion of corrective actions associated with this CAR:

1. Email dated 12/10/13, appointing VE Experts for INL Building CPP-666
2. CCP Standing Order CCP-SO-108, Rev. 0
3. Employee acknowledgement of the issuance of CCP-SO-108, including verification of the acknowledgement in the CCP Integrated Data Center (IDC) on 1/2/14.
4. List of Qualified Individuals (LOQI), dated 12/9/13 and 12/10/13 reflecting VE Experts by appointed facility.

Based on the results of the review of the objective evidence included in the CAR 14-006 closure package, it is recommended that CAR 14-006 be closed.



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



Date