



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

July 18, 2014

Mr. Jon E. Hoff, Manager
Quality Assurance
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: CBFO Evaluation and Rejection of the CAP for CAR 14-042 from Surveillance S-14-20, SRS/CCP Radiological Characterization of Sealed Sources Activities

Dear Mr. Hoff:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the proposed Corrective Action Plan (CAP) for CBFO Corrective Action Report (CAR) 14-042, which resulted from Surveillance S-14-20, Savannah River Site Central Characterization Program (SRS/CCP) Radiological Characterization of Sealed Sources Activities. The results of the review indicate that the CAP is not acceptable, as documented on the enclosed CAR Continuation Sheet. Please revise the CAP for CAR 14-042, addressing the comments contained in the evaluation, and submit your revised response to me on or before August 8, 2014.

If you have any questions regarding CAR 14-042, please contact me at (575) 234-7491.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Miehl".

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

M. Brown, CBFO	*ED	S. Escareno-Soto, NWP/QA	ED
M. Navarrete, CBFO	ED	T. Peake, EPA	ED
J.R. Stroble, CBFO	ED	L. Bender, EPA	ED
T. Morgan, CBFO	ED	E. Feltcorn, EPA	ED
M. Pinzel, CBFO	ED	R. Joglekar, EPA	ED
N. Castaneda, CBFO	ED	S. Ghose, EPA	ED
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R. Lee, NWP/CCP	ED	R. Allen, CTAC	ED
R. Reeves, NWP/CCP	ED	P. Martinez, CTAC	ED
N. Dickes, NWP/CCP	ED	B. Pace, CTAC	ED
V. Cannon, NWP/CCP	ED	J. Schuetz, CTAC	ED
A.J. Fisher, NWP/CCP	ED	P.Y. Martinez, CTAC	ED
M. Walker, NWP/CCP	ED	P. Hinojos, CTAC	ED
I. Joo, NWP/CCP	ED	D. Sellmer, CTAC	ED
W. Ledford, NWP/CCP	ED	G. White, CTAC	ED
J. Carter, NWP/CCP	ED	Site Documents	ED
B. Allen, NWP/QA	ED	CBFO M&RC	
S. Punchios, NWP/QA	ED	CBFO QA File	

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 14-042

2. Activity No: S-14-20

3. Page 1 of 2

Block # 16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 14-042. The CAP was submitted via NWP letter QA:14:00203 UFC:2300.00 (CBFO Unique # 1401828), dated June 27, 2014, from Mr. J.E. Hoff, Manager, Quality Assurance, to Mr. D.S. Miehl, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

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

After the changes to procedure CCP-TP-514 are completed as described in the Actions to Prevent Recurrence, the calculation packages will be reviewed, and revised if necessary, to meet the revised procedural requirements.

Evaluation

The remedial actions described do not adequately address the conditions adverse to quality identified in the CAR.

Specifically, the remedial actions do not address the issue of a standing order or other administrative controls to govern development of calculation packages during the period that procedure CCP-TP-415 is under revision. The CAP should be revised to indicate the means implemented to ensure that calculations are developed in accordance with upper-tier requirements during the period that the procedure is being revised to address software control within calculation packages.

INVESTIGATIVE ACTIONS

The investigation resulted in identifying that the procedural steps in CCP-TP-514 do not provide clear instructions on how to verify calculations in a calculation package. The Checker performs hand calculations to verify the calculations in the calculation package. The checker is a qualified individual to have performed the work and has not been involved in the development of the radiological characterization approach for the waste stream.

Extent

This condition applies to all calculation packages developed under CCP-TP-514.

Impact

For all calculation packages developed under CCP-TP-514 the Checker verified all the calculations by hand. There is no impact on the usability of the results of the calculation packages.

Evaluation

The investigative actions described provide reasonable assurance that all necessary efforts were made to identify extent, impact, and the corrective actions necessary to preclude recurrence of the deficiency identified in the CAR.

ROOT CAUSE

A root cause analysis was not required for this CAR.

Evaluation

N/A

CAR CONTINUATION SHEET

1. CAR No: 14-042

2. Activity No: S-14-20

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ACTIONS TO PRECLUDE RECURRENCE

Procedure CCP-TP-514, CCP Procedure for Radiological Calculation Package Submittal, will be revised to provide clear instructions for using hand calculations to verify the calculations in the calculation package and the required documentation.

Evaluation

The actions to preclude recurrence described adequately address the scope of the deficiency identified in the CAR.

SCHEDULE FOR COMPLETION OF CORRECTIVE ACTIONS

The following corrective actions and due dates for CAR 14-042 were presented in the CAP.

COMMITMENTS

DUE DATES

Issue revised procedure CCP-TP-514, CCP Procedure for Radiological Calculation Package Submittal, to provide clear instructions for using hand calculations to verify the calculations in the calculation package.

August 15, 2014

Revise calculation packages, if necessary.

September 30, 2014

Provide closure documentation to NWP Quality Assurance.

October 6, 2014

Evaluation

The schedule for completion of corrective actions is acceptable. However, the commitment to submit the closure documentation to CBFO is omitted. The expected completion date for all corrective actions is October 6, 2014.

REJECTION

The results of the CAP evaluation indicate that the proposed corrective actions do not satisfactorily address the conditions adverse to quality identified in CAR 14-042. The scope of remedial actions must be revised to address controls to be implemented for calculation package development during the period that procedure CCP-TP-415 is under revision. The commitment date for submittal of the closure documentation package to CBFO should be included in the commitment section of the revised CAP.

It is recommended that the CAP for CAR 14-042 be rejected and that a revised CAP be submitted for evaluation.

Based on the information provided in the CAP, the following items will be evaluated to verify completion of corrective actions, with supporting documentation provided in the CAR closure package. Other items related to completion of corrective actions and items stated in the revised CAP may be included in verification activities as necessary.

- 1) A review of revisions to procedures CCP-TP-514 and CCP-QP-022 to determine adequate flow-down of CBFO QAPD requirements and description of verification of calculations using hand calculations and/or control and verification of software applications that are embedded within calculation packages.
- 2) A review of any revisions to calculation packages performed to meet compliance with verification of calculations and/or control of software stated in the new versions of the calculation procedure CCP-TP-514 and/or with any applicable sections of CCP-QP-022.

Jane R. Schuetz

7/15/14

Evaluation Performed By: J.R. Schuetz

Date: