



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



July 21, 2014

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

Subject: CBFO Evaluation and Acceptance of the CAP for CBFO CAR 14-044 Resulting from Audit A-14-18, Idaho National Laboratory Central Characterization Program

Dear Mr. Hoff:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 14-044. The results of the review indicate that the CAP is acceptable, as documented on the enclosed CAR Continuation Sheet. Upon completion of all corrective actions as outlined in the approved CAP, please provide notification and documentation supporting closure of this CAR, so that verification activities may be performed.

If you have any questions or comments concerning the evaluation, please contact me at (575) 234-7491.

Sincerely,

A handwritten signature in cursive script, reading "D. S. Miehl".

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure

Mr. Jon E. Hoff

-2-

July 21, 2014

cc: w/enclosure

M. Brown, CBFO	*ED
J. R. Stroble, CBFO	ED
M. Navarrete, CBFO	ED
M. Pinzel, CBFO	ED
B. Roberts, DOE-ID	ED
F. Sharif, NWP	ED
D. E. Gulbransen, NWP	ED
V. Cannon, NWP	ED
A.J. Fisher, NWP	ED
M. Walker, NWP	ED
W. Ledford, NWP	ED
J. Carter, NWP	ED
B. Allen, NWP/QA	ED
S. Punchios, NWP/QA	ED
S. Escareno-Soto, NWP/QA	ED
T. Peake, EPA	ED
L. Bender, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
S. Ghose, EPA	ED
R. Lee, EPA	ED
J. Kieling, NMED	ED
T. Kiphuis, NMED	ED
S. Holmes, NMED	ED
R. Maestas, NMED	ED
C. Smith, NMED	ED
V. Daub, CTAC	ED
R. Allen, CTAC	ED
P. Martinez, CTAC	ED
B. Pace, CTAC	ED
C. Castillo, CTAC	ED
J. Oliver, CTAC	ED
D. Blauvelt, CTAC	ED
C. Roberts, CTAC	ED
P. Hinojos, CTAC	ED
D. Sellmer, CTAC	ED
G. White, CTAC	ED
Site Documents	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CAR CONTINUATION SHEET

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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) 14-044. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter CP:14:00232 UFC:2300.00, dated July 9, 2014, from Mr. J. E. Hoff, Manager, NWP 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

- a) *CCP-HSP-013 was distributed to NDA SGRS and NDA WAGS Operators as assigned reading, and all operators have completed their assignment*
- b) *The qualification cards for NDA SGRS and NDA WAGS Operators/ITRs were revised to add CCP-HSP-013 to the list of required indoctrination training/reading*
- c) *CCP completed a review of technical operating procedures to determine whether there were any other cases where the Training Requirements section contained additional, non-standard requirements language similar to that found during the audit. The results are discussed in the Investigative Actions section of this Corrective Action Plan.*

Evaluation:

The remedial actions taken as described above are deemed appropriate. Documented evidence of the actions above must be submitted in the closure package.

INVESTIGATIVE ACTIONS*Extent*

CCP currently has three HSPs across its scope of work:

1. *CCP-HSP-013, CCP Waste Assay Gamma Spectrometer (WAGS) and SWEPP Gamma Ray Spectrometer (SGRS) Nondestructive Assay Systems Health and Safety Plan*
2. *CCP-HSP-014, Health and Safety Plan Program Implementation for CCP*
3. *CCP-HSP-500, CCP Hazard Control Plan for RH TRU Operations at INTEC*

CCP completed a review of technical operating procedures for any other cases where the Training Requirements section might contain additional, non-standard requirements similar to those found during the audit. CCP identified six other examples during the review:

1. *Procedures CCP-TP-019, CCP-TP-115, and CCP-TP-010, CCP Waste Assay Gamma Spectrometer (WAGS) and SWEPP Gamma-Ray Spectrometer (SGRS) Calibration Procedure, all refer to an INL procedure for personnel handling sources. The INL procedure (MP-RS&C-6.16, Radioactive (Non-Nuclear) Source Control) is on the list of site-required training for CCP NDA personnel at INL, which is tracked internally by INL under its training program. CCP LOQIs provide the date of the next site-required training action for all CCP operations personnel at all generator sites, so there is an independent notification when this, or any other, site-required training action is coming due. Consequently, the training requirements in CCP-TP-010, CCP-TP-019, and CCP-TP-115 are satisfied by CCP participation in the site-required training program for CCP personnel handling sources at INL, as tracked on the LOQI.*
2. *CCP-TP-080, CCP Operating the WMF 610 Real-Time Radiography (RTR) System, and CCP-TP-119, CCP Operating the Real-Time Radiography (RTR) System #5, both contain references to CCP-HSP-009, CCP RTR Health and Safety Plan. CCP-HSP-009 was canceled on July 1, 2013, which is more recent than the dates of the*

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current revisions of CCP-TP-080 (October 23, 2012) and CCP-TP-119 (September 13, 2012). Health and safety requirements for CCP personnel in the field are now addressed in CCP-HSP-014, which is on RTR qualification card RTR-02.

3. CCP-HSP-500 needs to be integrated into the training and qualification program for personnel performing RH TRU operations at INTEC. To ensure proper awareness, CCP has sent CCP-HSP-500 as assigned reading to these personnel.

Impact

There is no impact from the CAR conditions.

- a. CCP-HSP-013 contains basic safety information associated with the WAGS and SGRS NDA systems. The NDA operators in question are experienced and become familiar with the technical and safety aspects of their equipment through means other than the HSP alone. The qualification cards address safety-related activities like handling of liquid nitrogen in the OJT Knowledge sections of the qualification cards. The operators come to know their equipment, its limitations, and good safety practices in a variety of ways.
- b. CCP personnel performing source handling in accordance with the INL document referenced in the three CCP NDA procedures receive training by participation in site-required training, independently tracked in the CCP LOQI.
- c. To ensure awareness, CCP has sent CCP-HSP-500 as assigned reading to personnel performing RH TRU operations at INTEC.

Evaluation:

The investigative actions as described are deemed appropriate to address the condition adverse to quality identified in the CAR.

ROOT CAUSE DETERMINATION

This section is divided into two parts, one for the lack of evidence that six NDA operators had read CCP-HSP-013, and one for the fact that two NDA qualification cards did not contain CCP-HSP-013 in the list of indoctrination training/reading (the last sentence of the Condition Adverse to Quality section of the CAR).

No Evidence that Six NDA Operators Had Read CCP-HSP-013, as Required by Two NDA Procedures

The standard method for ensuring that personnel have read the documentation relevant to their function is to include these documents in the list of indoctrination training/reading for the associated qualification card. At one time, CCP did include documents like Health and Safety Plans (HSPs) in the qualification cards for equipment associated with the qualified position. About four years ago, CCP management made a decision to begin limiting the content of indoctrination training/reading lists in qualification cards for certified positions to documents that flowed down from the certified program. At that time, documents like HSPs and CCP-PO-005, CCP Conduct of Operations, (CONOPS) were removed from qualification cards for certified positions.

Since that time, CCP management has reversed this decision and HSPs and CONOPS are being systematically added back to qualification cards for operators/ITRs, regardless of their relationship to the certified program.

With respect to the two procedures that still require that operators read CCP-HSP-013, personnel reviewing the procedures (during revision) and performing them in the field, all believed that the HSP was on the NDA qualification cards associated with the scope of work (as, at one point, it was).

Two NDA Qualification Cards that did not Include CCP-HSP-013 in the List of Indoctrination/Required Reading

CCP Training was aware that CCP-HSP-013 was not included in the list of indoctrination training/reading for the two NDA qualification cards, and was planning to revise the qualification cards to add them back. The first priority was for Training to add CP-HSP-014, Health and Safety Program Implementation for CCP, and CCP-PO-005 as a

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general change to qualification cards for operator/ITR positions. Training was unaware that two NDA procedures contained CCP-HSP-013 as a pre-requisite or Training would have circulated the HSP as assigned reading, and made the revision to the two NDA qualification cards a higher priority.

Evaluation:

The root cause determination is acceptable.

ACTIONS TO PRECLUDE RECURRENCE

CCP has already initiated the action required to prevent recurrence of the reported conditions. Some time ago, CCP management reversed its previous decision to limit indoctrination training/reading material for qualification cards to documents under the certified program. Since that time, CCP Training has been systematically updating qualification cards to re-introduce documents like CCP-HSP-014 and CCP-PO-005.

COMMITMENTS**DUE DATES**

CCP to distribute HSP-HSP-013 to NDA SGRS and NDA WAGS Operators as assigned reading.

Complete

CCP to revise the qualification cards for NDA SGRS and NDA WAGS Operators/ITRs to add CCP-HSP-013 to the list of required indoctrination training/reading.

Complete

CCP to complete a review of technical operating procedures to determine whether there were any other cases where the Training Requirements section contained additional, non-standard requirements.

Complete

CCP to issue CCP-HSP-500 as assigned reading to personnel performing RH TRU operations at INTEC.

Complete

CCP to determine and implement the best method for integrating CCP-HSP-500 into the training and qualification program for personnel performing RH TRU operations at INTEC.

August 11, 2014

CCP to revise CCP-TP-019 and CCP-TP-115 to remove references to CCP-HSP-013 (now that it is in the qualification cards associated with NDA WAGS and SGRS) and INL procedure MP- RS&C-6.16 (since it is covered by site-required training at INL)

July 28, 2014

CCP to revise CCP-TP-010 to remove reference to INL procedure MP- RS&C-6.16 (since it is covered by site-required training at INL)

August 11, 2014

CCP to revise CCP-TP-080 and CCP-TP-119 to delete references to obsolete CCP-HSP-009.

August 11, 2014

CCP to complete updating qualification cards to add CCP-HSP-014 and CCP-PO-005 to lists of required indoctrination training/reading.

July 28, 2014

Provide closure documentation to NWP Quality Assurance.

August 14, 2014

NWP QA, transmit closure documentation to the CBFO.

August 20, 2014

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Evaluation:

The actions to preclude recurrence are acceptable on the condition that supporting documentation for all commitments listed above is enclosed in the CAR closure package.

ACCEPTANCE

The results of the evaluation of the CAP indicate that the investigative actions and the proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 14-044, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 14-044 be approved.

Cindi Castillo

7/16/14

Evaluation Performed By: Cindi Castillo, CTAC Auditor

Date: