



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

JUL 24 2014

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

Subject: CBFO Evaluation and Acceptance of the CAP for CBFO CAR 14-046 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) 14-046. The results of the review indicates 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.

Please contact me at (575) 234-7491 if you have any questions or comments concerning the evaluation.

Sincerely,

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

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure



Mr. Jon E. Hoff

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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
J. Harris, NWP	ED
F. Sharif, NWP/CCP	ED
D.E. Gulbransen, NWP/CCP	ED
V. Cannon, NWP/CCP	ED
A.J. Fisher, NWP/CCP	ED
M. Walker, NWP/CCP	ED
W. Ledford, NWP/CCP	ED
J. Carter, NWP/CCP	ED
B. Allen, NWP/QA	ED
S. Punchios, NWP/QA	ED
S. Escareno-Soto, NWP/QA	ED
L. Bender, EPA	ED
S. Ghose, EPA	ED
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J. Kieling, NMED	ED
T. Kliphuis, 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
T. Ackman, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
Site Documents	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 14-046

2. Activity No: A-14-18

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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) 14-046. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:14:00233 UFC:2300.00, dated July 10, 2014, from Mr. J. E. Hoff, Manager, NWP Quality Assurance, to Mr. Dennis Miehls, 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

The obsolete revision of CCP-AK-INL-580 was removed from the work station and all RTR was performed in accordance with the current revision (which was already at the work station but not in use)

Evaluation:

The remedial actions taken as described above are deemed appropriate.

INVESTIGATIVE ACTIONS*Extent*

CCP performed a check of other AK Summary Reports in use at the INL, and all other reports were the current version. The extent is limited to the CAR condition.

Impact

The RTR operators had received the AK briefing required for Revision 4 of CCP-AK-INL-580 and were therefore aware of the latest information associated with the waste stream. So even if the condition had not been discovered and corrected during the audit, there would have been no technical impact.

Evaluation:

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

ROOT CAUSE DETERMINATION

The CAR states that it is classified as "significant" based on the criterion that "Repeated attempts to resolve a [Condition Adverse to Quality] have been unsuccessful." The reference is to CBFO CAR 14-009, which reported a similar condition during the most recent recertification audit at ORNL.

CCP corrective actions taken in response to CBFO CAR 14-009 addressed and fully resolved the programmatic inadequacies that resulted in the condition reported during the recertification audit at ORNL. Prior to the resolution of CAR 14-009, the process for getting AK Summary Reports into the hands of the Vendor Project Managers (VPMs) and the NDE operators was not completely formalized, and depended in part on actions by Document Services and the Site Project Managers (SPMs) that were not addressed in CCP procedures.

The changes made to the CCP program in response to CAR 14-009 were totally effective in correcting the programmatic weaknesses that were identified during the ORNL recertification audit. In accordance with current requirements:

- 1. Document Services now forwards all AK Summary Reports (original issue and revisions) to the cognizant SPM*
- 2. The SPM now ensures that the VPM receives a copy of all AK Summary Reports (original issue and revisions)*

During the INL recertification audit, the VPM had received a copy of Revision 4 of CCP-AK-INL-580, the RTR operators had received the required AK briefing and were shown as being qualified on the LOQI, the operators had a copy of Revision 4 of the AK and had placed it in the binder at the work station.

For some reason (they were unable to provide an explanation), the RTR operators simply failed to remove the

CAR CONTINUATION SHEET

1. CAR No: 14-046

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obsolete revision of the AK from the binder, and continued to use it instead of the current revision.

Although the end result of CAR 14-009 and this CAR are the same - discovery of an obsolete revision of AK in use during RTR - the root causes are entirely different. In the case of CAR 14-009, programmatic weaknesses and reliance on informal methods for distribution of AK reports to the field, led to the CAR condition. In the case of this CAR, the RTR operators had the right revision in their possession, but - because they did not remove the obsolete version - ended up using the wrong one. This appears to be due to carelessness and lack of attention.

Evaluation:

The root cause investigation described adequately addresses the scope of the deficiency identified in the CAR.

ACTIONS TO PRECLUDE RECURRENCE

As discussed in the Root Cause section of this Corrective Action Plan, the programmatic weaknesses that led to the condition described in CAR 14-009 at ORNL were fully resolved in response to that CAR. None of the factors that led to CAR 14-009 played any part in the use of the obsolete revision of AK at INL.

- a. *CCP will revise CCP-PO-005 (by Standing Order) to require that operators make daily entries in the applicable operational logbooks (each shift that characterization is performed), listing the AK Summary Reports in use, along with their revisions. The Standing Order will remain in effect until CCP-PO-005 is revised.*

COMMITMENTS

DUE DATES

CCP to remove obsolete revision of CCP-AK-INL-580 from use (completed during the audit)

Complete

CCP to check other AK Summary Reports in use at the INL, to ensure that all other reports are the current version.

Complete

CCP to revise CCP-PO-005 (by Standing Order) to require to make entries in the applicable operational logbooks, listing the AK Summary Reports and their revisions, each shift that characterization is performed.

July 14, 2014

Provide closure documentation to NWP Quality Assurance.

July 31, 2014

NWP QA, transmit closure documentation to the CBFO.

August 6, 2014

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 proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 14-046. Therefore, it is recommended that the CAP for CAR 14-046 be approved.



Evaluation Performed By: *Porf Martinez*, CTAC Auditor

7/22/14
Date: