



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

August 22, 2014

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NMED
Hazardous Waste Bureau

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

Subject: Acceptance of the Revised CAP for CAR 14-041 Resulting from Surveillance
S-14-20, SRS/CCP Radiological Characterization of Sealed Source Activities

Dear Mr. Hoff:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the proposed revised Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 14-041, which resulted from Surveillance S-14-20 of the Savannah River Site (SRS) Central Characterization Program (CCP), Sealed Source Characterization Program. The results of the review indicate that the revised CAP is acceptable, as documented on the enclosed CAR Continuation Sheet.

Please proceed with the corrective actions described in the revised CAP and provide notification and documentation supporting closure upon completion of all corrective actions, so that verification activities may be performed.

If you have any questions concerning CAR 14-041, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure
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CBFO QA File
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*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 14-041

2. Activity No: S-14-20

3. Page 1 of 2

Block # 16 Acceptance/Rejection of Proposed Corrective Actions:

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 14-041. The revised CAP was submitted via NWP letter QA:14:00269 UFC:2300.00 (CBFO Unique # 1402188), dated August 5, 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

A Standing Order will be prepared to provide interim detail instructions to achieve adequate verification of the RH program calculation packages. The Standing Order will (1) allow annotations to the calculation packages by the checker to qualify minor discrepancies; (2) require systematic check marks on the individual cells in the calculation package to ensure a complete verification of the package; (3) assign an independent reviewer (non-technical) to ensure that the values and equations in the calculation packages match in the corresponding spreadsheet; (4) require, as appropriate, the input functions that result in recalculation of all the spreadsheet results be clearly identified; 5) require adequate information on the source and nature of the data used in the calculation package i.e., importation from other software or manual input.

Requirements of the standing order will be executed for currently in progress calculation packages (estimated at 40 calculation packages) that have not been presented to EPA or submitted to CCP records to identify any errors.

This will include calculation No. SRS-RH-88, Sealed Source Characterization.

Evaluation

The remedial action of preparation and application of a standing order for verification of calculation packages, including calculation package SRS-RH-88, adequately addresses the conditions adverse to quality identified in the CAR.

INVESTIGATIVE ACTIONS*Extent*

The standing order will be implemented for all the calculation packages, estimated at 40, in progress that have not been submitted to CCP records or accepted by EPA.

Impact

None of the containers in the waste streams currently being characterized have been certified to ship to WIPP.

Evaluation

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

ROOT CAUSE

A root cause analysis was not required for this CAR.

Evaluation

N/A

ACTIONS TO PRECLUDE RECURRENCE

In the interim the standing order will be implemented to prevent recurrence of this event in the short term. In the long term an additional QA procedure (CCP-QP-037) will be prepared to formalize the instructions provided in the standing order and to provide for the adequate verification of the calculation packages. CCP-QP-022 is being revised to exempt calculation packages prepared using non-application, one time use spreadsheets.

CAR CONTINUATION SHEET

1. CAR No: 14-041

2. Activity No: S-14-20

3. Page 2 of 2

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 14-041 were presented in the CAP.

COMMITMENTS

DUE DATES

Issue Standing Order

August 12, 2014

Calculation package No. SRS-RH-88, waste stream SR-RH-SDD.01 process in accordance with the standing order.

August 15, 2014

Estimated 40 calculation packages verified in accordance with standing order

September 30, 2014

Revise CCP-QP-022

September 15, 2014

Issue CCP-QP-037, Calculation procedure

October 4, 2014

Provide closure documentation to NWP Quality Assurance

October 8, 2014

NWP QA Transmit closure documentation to the CBFO

October 15, 2014

Evaluation

The schedule for completion of corrective actions is acceptable. The expected completion date for all corrective actions is October 15, 2014.

ACCEPTANCE

The results of the CAP evaluation indicate that the proposed corrective actions satisfactorily address the conditions adverse to quality identified in CAR 14-041; that investigation activities performed were adequate to address the scope of the condition; and that other actions described provide adequate measures to preclude recurrence. Therefore, it is recommended that the CAP for CAR 14-041 be approved.

Based on the information provided in this 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 included in the revised CAP may be evaluated as necessary.

- 1) Review of the content of the standing order.
- 2) Review of revised calculation package SRS-RH-88 to determine compliance with software quality assurance requirements.
- 3) Review of other calculation packages that are revised under the standing order.
- 4) Review of revisions to procedures CCP-TP-514 and CCP-QP-022 to determine adequate flow-down of CBFO requirements and description of verification of calculations using hand calculations and/or control and verification of software applications embedded in calculation packages.
- 5) Review of any revisions to calculation packages performed to meet compliance with verification of calculations and/or control of software contained in the revisions of CCP-TP-514 and/or applicable sections of CCP-TP-022.
- 6) Review of the new calculation procedure CCP-QP-037.

Evaluation Performed By: J.R. Schretz

Date: 8/20/14