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

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August 26, 2014

NMED  
Hazardous Waste Bureau

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

Subject: Verification and Acceptance of Corrective Actions for CAR 14-044 from Audit A-14-18,  
Idaho National Laboratory Central Characterization Program

Dear Mr. Hoff:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 14-044, which resulted from Audit A-14-18. The results of the verification are documented on the enclosed CAR Continuation Sheet, and indicate that the documentation of completion of corrective actions is acceptable.

The verification concluded that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 14-044 is considered closed.

If you have any questions regarding the closure of CAR 14-044, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl  
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure  
M. Brown, CBFO \* ED  
J. R. Stroble, CBFO ED  
M. Navarrete, CBFO ED  
M. Pinzel, CBFO ED  
N. Castaneda, CBFO ED  
J. Zimmer, DOE-ID ED  
J. Wells, DOE-ID ED  
B. Roberts, DOE-ID ED  
R. McQuinn, NWP ED  
J. Blankenhorn, NWP 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  
I. Joo, NWP/CCP ED  
M. Walker, NWP/CCP ED  
W. Ledford, NWP/CCP ED  
J. Carter, NWP/CCP ED  
N. Dickes, NWP/CCP 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. Kliphuis, NMED ED  
S. Holmes, NMED ED  
R. Maestas, NMED ED  
C. Smith, NMED ED  
Site Documents 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  
P. Hinojos, CTAC ED  
G. White, CTAC ED  
CBFO QA File  
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\*ED denotes electronic distribution

## CAR CONTINUATION SHEET

1. CAR No: 14-044

2. Activity No: A-14-18

3. Page 1 of 4

**Block # 17 & 18 Acceptance of Corrective Action Completion and Closure:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 14-030, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership (NWP) letter QA:14:00166 UFC:2300.00, from J. E. Hoff to Dennis S. Miehl, Subject: "TRANSMITTAL OF DOCUMENTATION SUPPORTING COMPLETION OF THE CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 14-030 WHICH RESULTED FROM CBFO AUDIT A-14-10, NWP CENTRAL CHARACTERIZATION PROGRAM AND QUALITY ASSURANCE PROGRAM"

*Italicized text, taken verbatim from the corrective action plan (CAP), is used to reflect the correlation between the corrective actions and the method used for verification.*

**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.*

**Verification:**

The following documentation was reviewed as verification for completion of Remedial Actions (a – c) as listed above:

- a) Table showing CCP acknowledgements of CCP-HSP-013 rev. 2 including dates.
- b) Copies of revised qualification cards to demonstrate inclusion of CCP-HSP-013.
- c) Table showing CCP acknowledgements of CCP-HSP-500 rev. 2 including dates

Remedial Actions were satisfactorily completed as stated.

**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*

## CAR CONTINUATION SHEET

1. CAR No: 14-044

2. Activity No: A-14-18

3. Page 2 of 4

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 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.

**Verification:**

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance letter CBFO:OQA:DSM:RMS:14-1245:UFC 2300.00.

**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

## CAR CONTINUATION SHEET

1. CAR No: 14-044

2. Activity No: A-14-18

3. Page 3 of 4

*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 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.*

**Verification:**

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance letter CBFO:OQA:DSM:RMS:14-1245:UFC 2300.00.

**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*

## CAR CONTINUATION SHEET

1. CAR No: 14-044

2. Activity No: A-14-18

3. Page 4 of 4

*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*

Verification:

Closure package documentation contained the following documentation:

- Acknowledgements of reviews for CCP-HSP-013.
- Revised Qual Cards for NDA Operator/ITR for the WAGS System Qual Card and NDA Operator/ITR for the SGRS . Revision shows inclusion of CCP-HSP-013
- Evidence that CCP had completed a review of technical procedures to determine whether there were any other cases where the Training Requirements section contained additional non-standard requirements. 6 cases were identified.
- Acknowledgements of reviews for CCP-HSP-500
- E-mails and paper written to describe integration of CCP-HSP-500 into the training and qualification program for personnel performing RH TRU operations at INTEC. The decision was made to cancel CCP-HSP-500 and utilize CCP-HSP-014. E-mails included documentation of completion of the change.
- Copies of revised procedures CCP-TP-115 and CCP-TP-119 showing removal of references to CCP-HSP-013.
- Copy of CCP-TP-010 showing removal of reference to INL procedure MP-RS&C-6.16
- E-mail notification of cancellation of CCP-TP-080 and CCP-TP-119
- 13 other Qual Cards that have been updated to Add CCP-HSP-014 and CCP-PO-005 to lists of required indoctrination training/reading.

Documents were reviewed and found to fully demonstrate completion of actions as stated in the approved "Actions to Preclude Recurrence" section of the CAR.

Based on the results of the review and verification of the objective evidence included in the CAR 14-044 closure package, it is recommended that CAR 14-044 be closed.

Verification Performed By:

*Cindi Castillo*  
Randall Allen, CTAC Audits Manager

*8/25/14*

Date