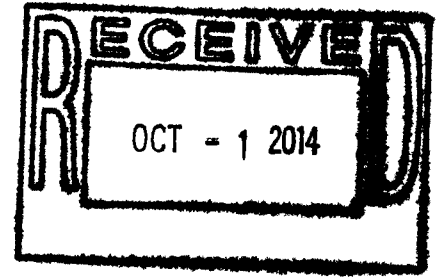




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

OCT - 1 2014

ENTERED



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

Subject: Issuance of CARs 14-061 and 14-062 Identified During Audit A-14-20

Dear Mr. Hoff:

The Carlsbad Field Office performed Recertification Audit A-14-20, Argonne National Laboratory Central Characterization Program and Certification Activities for Remote-Handled Transuranic Waste, September 16-18, 2014. Enclosed are Corrective Action Reports (CARs) 14-061 and 14-062 addressing the conditions adverse to quality identified during the audit.

Please provide documented responses for the CARs, ensuring that the required actions indicated in CAR Block 12 are addressed, including schedules for completion. Please return your responses to me on or before the due date identified in CAR Block 14a.

If you have any questions or comments concerning the CARs, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosures



cc: w/enclosures

- M. Brown, CBFO * ED
- J. R. Stroble, CBFO ED
- D. Miehlis, CBFO ED
- R. Purucker, DOE-CH ED
- D. Dietzel, DOE-CH ED
- K. Joshi, DOE-CH 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
- B. Allen, NWP/QA ED
- S. Punchios, 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
- R. Maestas, NMED ED
- S. Holmes, NMED ED
- C. Smith, NMED ED
- V. Daub, CTAC ED
- R. Allen, CTAC ED
- P. Martinez, CTAC ED
- B. Pace, CTAC ED
- P. Gomez, CTAC ED
- W. Root, NWP/CCP 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

CORRECTIVE ACTION REPORT

1. CAR No.: 14-061	2. Activity Report No.: A-14-20	3. Page 1 of 2
4. Controlling document: CBFO QAPD, Rev. 11 CCP-PO-005, Rev. 24	5. CBFO Assessment Team Leader: N. Navarrete	
6. Responsible organization: NWP/CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: W. Root	
8. Requirement that is involved: See CAR continuation sheet.		
9. Condition Adverse to Quality (CAQ): See CAR continuation sheet.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: WP-01	13b. CAR Initiator: <u>Berry D. Pace</u> <small>(printed name)</small>	Date: <u>9/30/14</u>
14a. Response due date: <u>Oct 28, 2014</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Martin Navarrete</u> <small>(printed name)</small> <u>MARTIN NAVARRETE</u>		Date: <u>9-30-14</u>
b. CBFO Quality Assurance Director: <u>Michael R. Brown</u> <small>(printed name)</small> <u>MICHAEL R. BROWN</u>		Date: <u>9/30/2014</u>
16. Acceptance of Proposed Corrective Actions: _____ <small>(printed name)</small>		Date: _____
17. Acceptance of Corrective Action Completion: _____ <small>(printed name)</small>		Date: _____
18. Closure: _____ <small>(printed name)</small>		Date: _____

CAR CONTINUATION SHEET**1. CAR No: 14-061****2. Activity No: A-14-20****3. Page 2 of 2****Block 8 - Requirement that is involved:**

CCP-PO-005, CCP Conduct of Operations, Rev. 24, Step 18.7: "If, in the opinion of the operator, a procedure cannot be performed as written, the system or component will be placed in a safe condition and CCP management informed so the discrepancy can be corrected."

CBFO QAPD, Rev 11, Section 2.1.2C; "Individuals performing work shall comply with implementing procedures; however, when work cannot be accomplished as described in the implementing procedure or accomplishment of such work would result in an undesirable situation, a condition adverse to quality, or an unacceptable safety risk, the work shall be suspended until the appropriate procedure change provisions are implemented."

Block 9 - Condition Adverse to Quality (CAQ):

In procedure CCP-TP-513, Rev. 2, one of the statements on Attachment 5 – Remote-Handled Waste Technical Staff ITR Checklist reads: "Calculations have been verified." The statement in Batch Data Report (BDR) ANLE-RH-50-69 is annotated to change the word "verified" to "reviewed," which is consistent with the language describing the Independent Technical Reviewer review at step 4.3 in procedure CCP-TP-513. However, making annotations to correct language in a technical procedure contradicts the requirement in CCP-PO-005, which requires a revision to the procedure when the procedure cannot be performed as written. This annotated change is reflected in all the BDRs selected for review; i.e., ANLE-RH-50-69 through ANLE-RH-50-90 dating back to October 2013.

CORRECTIVE ACTION REPORT

1. CAR No.: 14-062	2. Activity Report No.: A-14-20	3. Page 1 of 2
4. Controlling document: CCP-TP-513, rev. 2	5. CBFO Assessment Team Leader: N. Navarrete	
6. Responsible organization: NWP/CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: I. Joo	
8. Requirement that is involved: See CAR continuation sheet.		
9. Condition Adverse to Quality (CAQ): See CAR continuation sheet.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: DV -05	13b. CAR Initiator: <u>Paul Gomez</u> <small>(printed name)</small>	Date: <u>29 SEP 2014</u>
14a. Response due date: <u>Oct 28, 2014</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Martin Navarrete</u> <small>(printed name)</small>		Date: <u>9-30-14</u>
b. CBFO Quality Assurance Director: <u>Michael R. Brown</u> <small>(printed name)</small>		Date: <u>9/30/2014</u>
16. Acceptance of Proposed Corrective Actions: _____ <small>(printed name)</small>		Date: _____
17. Acceptance of Corrective Action Completion: _____ <small>(printed name)</small>		Date: _____
18. Closure: _____ <small>(printed name)</small>		Date: _____

CAR CONTINUATION SHEET**1. CAR No: 14-062****2. Activity No: A-14-20****3. Page 2 of 2****Block 8 - Requirement that is involved:**

CCP-TP-513, Revision 2, Paragraph 4.5.3 – “Review the Radiological Documentation Package to the criteria of Attachment 6, **AND** document on Attachment 6.”

Block 9 - Condition Adverse to Quality (CAQ):

Radiological documentation Package Number ANLE-RH-50-82, Attachment 6 – SPM Checklist is incomplete. The container in the ANLE-RH-50-82 (Drum 1229 from the AGHCF at Argonne National Laboratory) has been shipped to the Waste Isolation Pilot Plant.