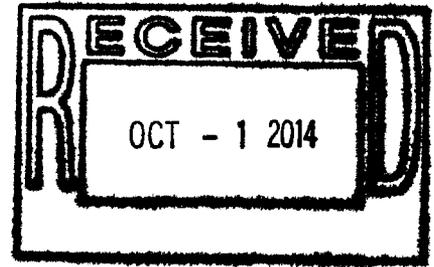




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
OCT - 1 2014

 ENTERED



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

Subject: Approval of the CAP for CBFO CAR 14-057 from Audit A-14-26, Sandia National Laboratories 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) 14-057. The results of the review indicate that the CAP is acceptable, as documented on the enclosed CAR Continuation Sheets. 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,

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
G. Beausoleil, DOE-SNL	ED
J. Todd, DOE-SNL	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
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
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
P. Hinojos, CTAC	ED
G. White, CTAC	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 14-057

2. Activity No: A-14-26

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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) 14-057. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:14:00310 UFC:2300.00, dated September 11, 2014, from Mr. J. E. Hoff, Manager, NWP Quality Assurance, to Mr. Dennis 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

The following remedial actions have been taken to address the reported condition:

- 1. AK Summary Report CCP-AK-SNL-500 (waste stream SNL-HCF-S5400-RH) has been revised to reflect the adequate number of layers of confinement for the Sandia waste drums.*
- 2. NCR-RHSNL-0762-14 has been issued to document the previous mismatch between the containers within BDR SNLRHVE14001 (one layer) and CCP-AK-SNL-500 (zero layers).*
- 3. CCP, Insert NCR-RHSNL-0762-14 in VE BDR SNLRHVE14001 to complete the documentation.*

Evaluation:

The remedial actions taken, as described above, are deemed appropriate.

INVESTIGATIVE ACTIONS

The purpose of recording the layers of confinement is to adequately account for the hydrogen diffusivity of the layer in the calculation of maximum allowable flammable gas generation rate for the TRUCON approved for the waste stream. TRUCON SN 321A, published in the RH-TRU Waste Content Codes (RH-TRUCON), in the waste packaging description accounts for the one layer of confinement.

Extent

CCP reviewed information in the NCR module of the Integrated Data Center and found that, since January 2013, CCP has issued 112 NCRs with trend code "L" (Acceptable Knowledge Deficiency). The NCRs were written at the major Host locations for Contact-Handled Waste (INL, LANL, ORNL, and SRS) and for Remote-Handled Waste (INL and SRS). The fact that such a substantial number of "L"-coded NCRs has been written across all major CH and RH Host locations supports the conclusion that the CAR condition is an isolated event.

Impact

As discussed above, the purpose of layers of confinement is to ensure that transportation requirements are met by assignment of the correct TRUCON code. The discrepancy regarding layers of confinement described in the AK Summary report at the time of the visual examination of the waste did not cause any impact as the waste is adequately described by the TRUCON code. There is the further consideration that the waste stream has not been approved by EPA or CBFO to certify to ship to WIPP.

Evaluation:

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

ROOT CAUSE DETERMINATION

During the first campaign at SNL, the waste stream had zero layers of confinement, and this information was appropriately reflected in the AK. During the current campaign, it became necessary to overpack the 30-gallon containers in 55-gallon containers, resulting in one layer of confinement for the waste stream. At the time the waste was being characterized, the Acceptable Knowledge Expert (AKE), the Visual Examination (VE) operators, and the Site Project Manager (SPM) were all aware that the actual number of layers of confinement did not agree with the

CAR CONTINUATION SHEET

1. CAR No: 14-057

2. Activity No: A-14-26

3. Page 2 of 2

AK Summary Report. A revision to the AK Summary Report was in-progress to capture this change, but the revision had not yet been approved and issued.

Because the SPM was aware that all actions to resolve the mismatch between the VE data sheets and AK were already in progress and would be completed well before CCP became certified at Sandia, the SPM failed to ensure that an NCR was issued in a timely manner at the time the entries were made to the VE data sheets showing one layer of confinement for the waste containers. Due to inattention to detail, the discrepancy was not discovered during subsequent project-level review of the BDR.

Evaluation:

The root cause determination adequately addresses the deficiency identified in the CAR.

ACTIONS TO PRECLUDE RECURRENCE

As discussed in the Extent section of this Corrective Action Plan, there is good evidence to show that NCRs are generally being written when necessary to document AK-related discrepancies. In addition, CCP-QP-005 is part of training and qualification of all CCP operators. As a best management practice (and to support current EPA expectations), all revisions to CCP-QP-005 are circulated to CCP Site Project Managers as assigned reading.

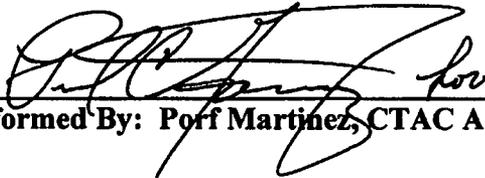
Failure to write the NCR at the time of discovery is an isolated event and preventive action is targeted at the individuals responsible for the specific condition reported in the CAR. All individuals involved in the preparation and review of the VE data sheets and review and approval of BDR SNLRHVE14001 will be counseled on the requirements of CCP-QP-005 and the requirement to issue an NCR in a timely manner when a nonconforming condition is discovered.

Evaluation:

The actions to preclude recurrence are adequate to address the condition adverse to quality identified in the CAR.

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 14-057. Therefore, it is recommended that the CAP for CAR 14-057 be approved.



Evaluation Performed By: Poff Martinez, CTAC Auditor

9/30/2014
Date: