



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
NOV 13 2014



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

Subject: Verification and Acceptance of Completion of Corrective Actions for CAR 14-041 from Surveillance S-14-20

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) 14-041, which resulted from Surveillance S-14-20, SRS/CCP Sealed Source Characterization Program. The results of the verification are documented on the enclosed CAR Continuation Sheet.

The verification concluded that the associated corrective actions have been fulfilled and satisfactorily implemented. Therefore, CAR 14-041, is considered closed.

If you have any questions or comments, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure

M. Brown, CBFO	*ED
J.R. Stroble, CBFO	ED
M. Navarrete, CBFO	ED
H. Crapse, CBFO	ED
R. McQuinn, NWP	ED
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M. Walker, NWP/CCP	ED
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J. Carter, NWP/CCP	ED
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R. Maestas, NMED	ED
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Site Documents	ED
V. Daub, CTAC	ED
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CBFO QA File

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*ED denotes electronic distribution

CAR CONTINUATION SHEET

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Block # 17 Acceptance of Corrective Action Completion:

The Carlsbad Field Office (CBFO) has reviewed the Corrective Action Report (CAR) 14-041 closure package, including objective evidence and supporting documentation submitted via Nuclear Waste Partnership LLC letter QA:14:00366:UFC:2300.00, from J. E. Hoff to D.S. Miehl, dated October 17, 2014, Subject: "TRANSMITTAL OF THE DOCUMENTATION SUPPORTING COMPLETION OF THE CORRECTIVE ACTION ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 14-041 WHICH RESULTED FROM CBFO SURVEILLANCE S-14-20, SRS/CCP RADIOLOGICAL CHARACTERIZATION OF SEALED SOURCES ACTIVITIES."

Italicized text, taken verbatim from the Corrective Action Plan (CAP), is used to reflect the correlation between the actions required by the CAR, the actions completed, and the method used for verification.

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.

Verification:

A copy of CCP Standing Order CCP-SO-113, Rev. 0, was included in the objective evidence submitted. The standing order references CBFO CAR 14-042, but is also applicable to completion of corrective actions for CAR 14-041. The standing order was reviewed and was determined to contain adequate content to address completion of remedial corrective actions for CAR 14-041.

A copy of revised calculation SRS-RH-88, Rev. 2, was included in the objective evidence submitted. The revised calculation was reviewed as evidence of completion of remedial corrective actions for CAR 14-041. NWP review of the revised calculation was determined to have been performed in accordance with Standing Order CCP-SO-113 and to be adequate to address completion of remedial corrective actions for CAR 14-041.

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.

Verification:

A copy of an e-mail, subject line "CTS 43499, 43500, 43509, 43511, 43512 (CBFO CARs 14-042 and 14-41)", was included in the objective evidence submitted and was reviewed. The e-mail included a list of calculation packages identified during investigative actions performed for CAR 14-041. The original estimate of the number of calculation packages involved in the scope of CAR 14-041 was stated in the CAP as 40 packages. Investigation by NWP determined that there were actually only 20 calculation packages involved with the deficiency stated in the CAR. A random sample of two calculation packages listed in the e-Mail, INL-RH-184 and SRS-RH-93, was reviewed. The NWP review of these revised calculations was determined to have been

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adequately performed in accordance with Standing Order CCP-SO-113. Presentation of the list of calculation packages and evidence from sampling of calculation packages INL-RH-184 and SRS-RH-93 were determined to be adequate to address the scope of packages involved in the deficiency stated in the CAR and adequate to evidence completion of investigative actions for CAR 14-041.

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.

Verification:

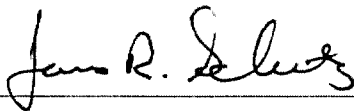
A copy of CCP-QP-022, CCP Software Quality Assurance Plan, Rev. 15, was included in the objective evidence submitted. Revised section 1.1 of the document was reviewed.

A copy of CCP-QP-037, CCP Calculations, Rev. 0, was included in the objective evidence submitted. The new procedure was reviewed and its content was determined to adequately preclude recurrence of the condition adverse to quality identified in CAR 14-041.

Revisions to procedures CCP-QP-022 and CCP-QP-037 were determined to adequately address completion of actions to preclude recurrence for CAR 14-041.

ACCEPTANCE

Review of the evidence presented in NWP letter QA:14:00366:UFC:2300.00 and the requested additional calculation packages indicate that the corrective actions completed satisfactorily address all conditions adverse to quality identified in CAR 14-041; that investigation activities performed adequately addressed the scope of the condition; and that adequate measures have been taken to preclude recurrence. Therefore, it is recommended that the CAR 14-041 be closed.



Verification Performed By: J.R. Schuetz



Date: