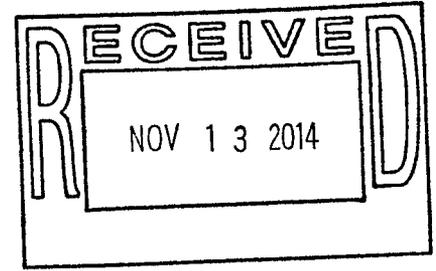




Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
NOV 13 2014

ENTERED



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 14-042  
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) 14-042, 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 14-042, is considered closed.

If you have any questions or comments, 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
- H. Crapse, CBFO ED
- R. McQuinn, NWP ED
- F. Shariff, NWP/CCP ED
- E. Gulbransen, NWP/CCP ED
- V. Cannon, NWP/CCP ED
- W. Ledford, NWP/CCP ED
- A.J. Fisher, NWP/CCP ED
- M. Walker, NWP/CCP ED
- I. Joo, NWP/CCP ED
- J. Carter, NWP/CCP ED
- B. Allen, NWP/QA ED
- S. Punchios, NWP/QA ED
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- P. Hinojos, CTAC ED
- D. Selmer, CTAC ED
- G. White, CTAC ED

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

## CAR CONTINUATION SHEET

1. CAR No: 14-042

2. Activity No: S-14-20

3. Page 1 of 2

**Block # 17 Acceptance of Corrective Action Completion:**

The Carlsbad Field Office (CBFO) has reviewed the Corrective Action Report (CAR) 14-042 closure package, including objective evidence and supporting documentation submitted via Nuclear Waste Partnership LLC letter QA:14:00367: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 14-042, WHICH RESULTED FROM CBFO AUDIT S-14-20, SRS/CCP RADIOLOGICAL CHARACTERIZATION OF SEALED SOURCES ACTIVITIES." Additional information supporting completion of corrective actions was received via Nuclear Waste Partnership LLC letter QA:14:00379:UFC:2300.00, from J. E. Hoff to D.S. Miehl, dated October 30, 2014, Subject: "SUPPLEMENTAL INFORMATION REGARDING THE DOCUMENTATION SUPPORTING COMPLETION OF THE CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 14-042, 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.*

**Verification:**

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

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 14-042. NWP review of the revised calculation was determined to have been adequately performed in accordance with CCP Standing Order CCP-SO-113. Completion of Rev. 2 of calculation SRS-RH-88, including review of the calculation, was determined to be adequate to address completion of remedial corrective actions for CAR 14-042.

**INVESTIGATIVE ACTIONS**

*The investigation identified that the procedural steps in CCP-TP-514 do not provide adequate direction as to when to process software used in calculation packages through the SQA process. CCP-TP-514 will be revised to clarify the submittal of the calculation packages to CCP records whereas a calculation package procedure, CCP-QP-037 is being written to adequately provide instructions to document the verification of the calculation packages, including appropriate SQA requirements.*

**Extent**

*Calculation packages documenting the formulas to calculate final radiological results or modeling information is only used in the remote-handled group in CCP. The calculations were not considered COTS software as defined in CCP-QP-022.*

*Lack of clear and concise procedural steps for verification of the calculation packages resulted in*

## CAR CONTINUATION SHEET

1. CAR No: 14-042

2. Activity No: S-14-20

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*documentation errors created when copying the formulas from the Excel spreadsheet to Word file in calculation SRS-RH-88.*

*Impact*

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

Verification:

Copies of new procedure CCP-QP-037 and revised procedure CCP-QP-022 were included in the objective evidence submitted. The procedures were reviewed and were determined to be adequate to address completion of investigative actions for CAR 14-042.

An explanation of the reason for eliminating the revision to procedure CCP-TP-514 was stated in NWP letter QA:14:00379:UFC:2300.00 and was found to be acceptable. In combination, these two procedures were determined to be adequate to provide direction for control of spreadsheet applications associated with calculations. The explanation is adequate to address completion of investigative actions for CAR 14-042.

## 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.*

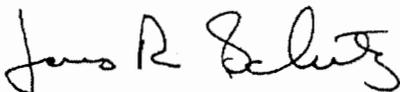
*CCP-QP-022 is being revised to exempt calculation packages prepared using non-application, one time use spreadsheets.*

Verification:

Copies of CCP Standing Order CCP-SO-113, Rev. 0, and procedure CCP-QP-037 were included in the objective evidence submitted under NWP letter QA:14:00367:UFC:2300.00. The standing order and the content of the procedure were reviewed and were determined to contain adequate content to address completion of actions to preclude recurrence for CAR 14-042.

## ACCEPTANCE

The results of the review of evidence of completion of corrective actions indicate that the proposed corrective actions satisfactorily address all conditions adverse to quality identified in CAR 14-042; that investigative actions performed were adequate to address the scope of the condition; and that the actions to precluded recurrence described are adequate. Therefore, it is recommended that the CAR 14-042 be closed.



11/6/14

Verification Performed By: J.R. Schuetz

Date: