

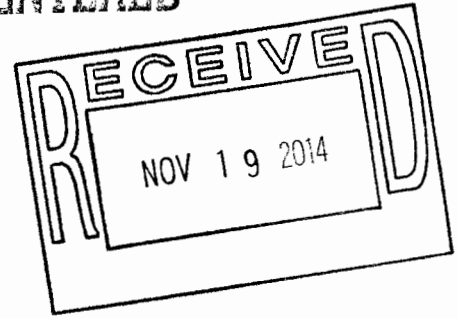


Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

NOV 19 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 14-061, Resulting from Audit A-14-20, Argonne National Laboratory Central Characterization Program Characterization and Certification Activities for Remote-Handled Transuranic Waste, Conducted September 16-18, 2014

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) 14-061. The results of the review indicate that the CAP is acceptable, as documented on the enclosed CAR Continuation Sheet. 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) 234-7483.

Sincerely,

Martin P. Navarrete  
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure  
M. Brown, CBFO \*ED  
J. R. Stroble, CBFO ED  
D. Miehl, CBFO ED  
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D. Sellmer, CTAC ED  
G. White, CTAC ED  
Site Documents ED  
CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution

## CAR CONTINUATION SHEET

1. CAR No: 14-061

2. Activity No: A-14-20

3. Page 1 of 3

**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) 14-061. The CAP was submitted via Nuclear Waste Partnership LLC letter QA:14:00371 UFC:2300.00, dated October 28, 2014, from Mr. J. E. Hoff, Manager, Quality Assurance, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO 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**

1. *CCP-TP-513, Procedure for Dimensional or Gravimetric Measurements for Radiological Characterization of Remote-Handled Transuranic Waste, was revised to change "verified" to "reviewed" on the Independent Technical Review (ITR) checklist and the procedure was issued on September 18, 2014.*
2. *The individual who made the alterations has been made aware that altering the content of a form (or other approved document) is not consistent with CCP conduct of operations.*
3. *As noted in the Extent section of this Corrective Action Plan, CCP:*
  - a. *Checked other RH documentation packages and determined there were no similar cases where alterations had been made to content by pen-and-ink change*
  - b. *Asked SPM reviewers of CH documentation packages from SRS, LANL, ORNL, and INL if they had observed any similar cases during their 2014 project-level reviews, and no such cases were identified.*

*No action will be taken with respect to the 31 ITR checklists that were altered to say "reviewed" instead of "verified." They correctly reflect the action taken by the ITR (review), and – as stated above – the checklist itself has been corrected by revision to the governing procedure.*

**Evaluation:**

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

**INVESTIGATIVE ACTIONS**

*The CCP investigation showed that the ITR function described in CCP-TP-513 is to review calculations, not verify calculations. Step 4.3 in the body of the procedure was correct, and there was an error in the ITR checklist. In accordance with CCP Conduct of Operations, the individual should have stopped and gotten the procedure revised so that the attached ITR checklist form agreed with the direction in the procedure itself. Instead, the individual completing the ITR checklist annotated the form to show the action as a review, consistent with his understanding that the form should accurately reflect the action being taken.*

*Other CCP personnel were involved with processing of the RH BDRs after the annotations to the ITR checklist were made, but none of them identified the condition as not being in accordance with CCP conduct of operations requirements.*

*Alteration to the content of CCP forms was not recognized as being subject to different and more stringent requirements than alteration to data and other entries on CCP forms.*

**CAR CONTINUATION SHEET**

1. CAR No: 14-061

2. Activity No: A-14-20

3. Page 2 of 3

Extent

CCP checked other RH documentation packages to determine whether there any similar cases where alterations had been made to document content by pen-and-ink change, instead of document revision. No such cases were identified: the ITR checklist associated with the radiological documentation packages generated per procedure CCP-TP-513 are the only BDRs that included an annotation. Alteration to the content of RH documentation is limited to the condition described in the CAR.

CCP asked SPM reviewers of CH documentation packages from SRS, LANL, ORNL, and INL if they had observed any similar cases during their 2014 project-levels reviews, and no such cases were identified.

Impact

The action performed by the ITR was a review of the calculations, as correctly stated in Step 4.3 of CCP-TP-513. There is no technical impact from the alteration, which was simply an attempt by the ITR to rectify an error in the ITR checklist, but done in the wrong way.

Evaluation:

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

**ROOT CAUSE DETERMINATION**

None required.

**ACTIONS TO PRECLUDE RECURRENCE**

CCP Lessons Learned Number: LL-2014-12, Alterations to the Content of CCP Forms Require a Revision to the Governing Procedure, has been provided to CCP personnel completing and reviewing ITR checklists.

COMMITMENTS

DUE DATES

CCP, revise CCP-TP-513 (Revision 3)

Complete

CCP, ensure the individual who made the made the alterations has been made aware that altering the content of a form is not consistent with CCP conduct of operations.

11/04/2014

CCP, check other RH documentation packages to determine that the condition is an isolated incident.

11/11/2014

CCP, have SPMs reviewers of CH documentation packages from SRS, LANL, ORNL, and INL confirm no similar instances were observed during project-level reviews.

11/18/2014

CCP, issue LL-2014-12, Alterations to the Content of CCP Forms Require a Revision to the Governing Procedure

Complete

Provide closure documentation to NWP Quality Assurance.

11/25/2014

NWP QA, transmit closure documentation to the CBFO.

12/04/2014

Evaluation:

The proposed corrective actions are deemed appropriate to address the condition documented in the CAR, and provide reasonable assurance of precluding the likelihood of recurrence.

# CAR CONTINUATION SHEET

1. CAR No: 14-061

2. Activity No: A-14-20

3. Page 3 of 3

## ACCEPTANCE

The results of the evaluation of the CAP indicate that the remedial actions, investigative actions, and actions to preclude recurrence, with the proposed corrective actions, satisfactorily address the condition adverse to quality documented in CAR 14-061 and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 14-061 be approved.



Evaluation Performed By: Berry Pace

11/13/14

Date: