



Department of Energy
Carlsbad Field Office
P. O. Box 3090
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DEC - 1 2014



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

Subject: Review and Verification of the Corrective Actions Submitted in Response to CBFO
CAR 14-061

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) has completed review and verification of the corrective actions submitted in response to CBFO Corrective Action Report (CAR) 14-061, which resulted from CBFO Audit A-14-20, Argonne National Laboratory Central Characterization Program TRU Waste Characterization and Certification Activities. The results of the verification are documented on the enclosed CAR Continuation Sheet, and indicate that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 14-061, is considered closed.

If you have any questions or comments concerning the closure of CAR 14-061, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure
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CBFO QA File
CBFO M&RC
*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 14-061

2. Activity No: A-14-20

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Block # 17 Acceptance of Corrective Action Completion:

The Carlsbad Field Office (CBFO) performed an evaluation of the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 14-061, identified during CBFO Audit A-14-20, Argonne National Laboratory Central Characterization Program TRU Waste Characterization and Certification Activities. The closure documentation was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:14:00395 UFC:2300.00, dated November 20, 2014, from Mr. J. E. Hoff, Manager, Quality Assurance, to Mr. Martin P. Navarrete, Senior Quality Assurance Specialist, Carlsbad Field Office. The methods used to verify completion of the actions contained in the approved corrective action plan (CAP) are described below.

The approved CAP submitted by NWP Quality Assurance, memorandum QA:14:00371, identified the following actions. *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 and approved in the CAP, are deemed appropriate. The documentation provided as evidence of closure included a copy of CCP-TP-513, Revision 3, reflecting the change of the word "verified" to "reviewed," and emails providing evidence of notification to the individual involved, that altering the content of a form is not consistent with CCP conduct of operations.

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.

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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 taken, including the determination of the extent and impact of the condition as described and approved in the CAP, are deemed appropriate

ROOT CAUSE DETERMINATION

None required.

ACTIONS TO PRECLUDE RECURRENCE:

1. CCP, revise CCP-TP-513 (Revision 3) 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.
2. CCP, check other RH documentation packages to determine that the condition is an isolated incident.
3. CCP, have SPMs reviewers of CH documentation packages from SRS, LANL, ORNL, and INL confirm no similar instances were observed during project-level reviews.
4. CCP, issue LL-2014-12, Alterations to the Content of CCP Forms Require a Revision to the Governing Procedure

Verification:

The following evidence was reviewed to confirm the completion of corrective actions associated with this CAR:

1. CCP-TP-053, Revision 3, reflecting the change of "verified" to "reviewed" on the ITR checklist.
2. Emails providing evidence of the reviews of RH ITR checklists at the other host sites to determine if similar conditions existed elsewhere.
3. Emails providing evidence of the reviews of CH ITR checklists at the other host sites to determine if similar conditions existed elsewhere.
4. Employee acknowledgements of having read and understood Lessons Learned article LL-2014-12.

Based on the results of the review of the objective evidence included in the CAR 14-061 closure package, it is recommended that CAR 14-061 be closed.

Verification Performed By: Berry D. Pace

Date 11/25/14