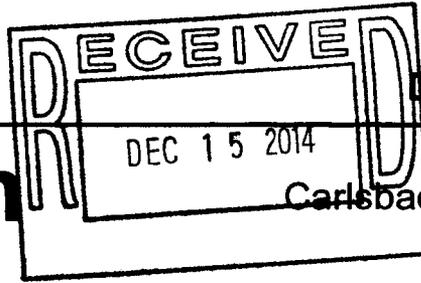


United States Government

**memorandum**

Department of Energy

Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: DEC 15 2014

REPLY TO  
ATTN OF: CBFO:QAD:MPN:LEC:14-2933:UFC 2300.00

SUBJECT: Approval of CAPs for CARs 15-002, 15-003, and 15-004 Identified During Audit A-15-01

TO: Benjamine Roberts, DOE-ID

Attached are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plans (CAPs) associated with CBFO Corrective Action Reports (CARs) 15-002, 15-003, and 15-004. The results of the review indicate that the CAPs are approved. Notify CBFO Quality Assurance Division upon completion of all corrective actions and provide notification and documentation supporting closure so that verification activities may be performed. Once notification has been received, an on-site CBFO surveillance will be conducted for closure verification.

If you have any questions or comments concerning the CAP evaluations, please contact me at (575) 234-7483.

A handwritten signature in black ink that reads "Martin P. Navarrete". The signature is fluid and cursive.

Martin P. Navarrete  
Senior Quality Assurance Specialist

Attachments

141228



cc: w/attachment

M. Brown, CBFO	* ED
J.R. Stroble, CBFO	ED
D. Miehl, CBFO	ED
N. Castaneda, CBFO	ED
J. Zimmerman, DOE-ID	ED
J. Wells, DOE-ID	ED
T. Jenkins, DOE-ID	ED
D. Haar, AMWTP	ED
G. Byram, AMWTP	ED
G. Tedford, AMWTP	ED
A. Morse, AMWTP	ED
T. Peake, EPA	ED
L. Bender, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
J. Kieling, NMED	ED
B. Tongate, NMED	ED
R. Maestas, NMED	ED
S. Holmes, NMED	ED
C. Smith, NMED	ED
V. Daub, CTAC	ED
R. Allen, CTAC	ED
P. Martinez, CTAC	ED
B. Pace, CTAC	ED
H. Kirschenmann, CTAC	ED
K. Martin, CTAC	ED
C. Castillo, CTAC	ED
P. Hinojos, CTAC	ED
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: 15-002

2. Activity No: A-15-01

3. Page 1 of 1

**Section 16 – Acceptance of Proposed Corrective Action Plan for CAR 15-002**

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 15-002. The CAP was submitted via Idaho Treatment Group, LLC letter C-2014-0378, dated November 20, 2014, from Danny Nichols, President and AMWTP Project Manager, to Mr. Martin Navarrete, U.S. Department of Energy, Carlsbad Field Office.

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. *An extent of condition review was performed regarding all periodic reviews.*
  - a. *Subject matter experts for specific document types shall review associated contract, regulatory and quality requirements and identify specific periodic review requirements. Actionee: A. Morse*

**Evaluation:**

As described, the remedial action is deemed appropriate.

**INVESTIGATIVE ACTIONS**

See Remedial Actions above.

**Evaluation:**

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

**ROOT CAUSE DETERMINATION**

N/A

**ACTIONS TO PREVENT RECURRENCE**

2. *Upon completion of Remedial Action 1.a, MP-DOCS-18.4, Document Control shall be revised to incorporate specific periodic review requirements identified and update requirements in the AMWTP Electronic Document Management System.*

**Evaluation:**

The corrective action to revise procedure MP-DOCS-18.4, *Document Control*, to incorporate specific periodic review requirements identified and update requirements in the Advanced Mixed Waste Treatment Project (AMWTP) Electronic Document Management System is deemed appropriate.

**COMMITMENTS**

**DUE DATES**

*Review associated contract, regulatory and quality requirements and identify specific periodic review requirements*

*March 03, 2015*

*MP-DOCS-18.4, Document Control shall be revised to incorporate specific periodic review requirements identified and update requirements in the AMWTP Electronic Document Management System.*

*April 30, 2015*

**ACCEPTANCE**

Contingent upon the stipulation described above in the evaluation of the actions to prevent recurrence, the CAP is deemed appropriate. Therefore, it is recommended that the acceptance of the CAP for CAR 15-002 be approved provided the conditions specified in *Actions To Prevent Recurrence* are adequately addressed and included in the closure documentation.

*Cindi Castillo for*

*12/11/14*

Evaluation Performed By: Harley Kirschenmann

Date

## CAR CONTINUATION SHEET

1. CAR No: 15-003

2. Activity No: A-15-01

3. Page 1 of 2

**Section 16 – Acceptance of Proposed Corrective Action Plan for CAR 15-003.**

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 15-003. The CAP was submitted via Idaho Treatment Group, LLC letter C-2014-0378, dated November 20, 2014, from Danny Nichols, President and AMWTP Project Manager, to Mr. Martin Navarrete, U.S. Department of Energy, Carlsbad Field Office.

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. *An extent of condition review was performed which determined the following:*

- a) *MP-TRUW-8.26, Section 3.1.1 identifies the following information for inclusion in the Semi-Annual Report to Management:*
- *Any changes to the QAPjP (MP-TRUW-8.2)*
  - *Identification of any significant QA/QC problems, recommended solutions and corrective actions*
  - *As assessment of QC data collected during the period, including the frequency of repeated analyses, reasons for those repeats and corrective actions*
  - *Discussion of whether Quality Assurance Objectives (QAOs) have been met and any resulting impact on decision making*
  - *Limitations on the use of measurement data*
  - *Status of Performance Demonstration Program (PDP) results*
  - *Results of audits and surveillances conducted during the period*
  - *Nonconformance report (NCR) status*
  - *Trend analysis information*
- b) *The Semi-Annual Report to Management is laid out in the above format with the exception of QAO discussion. QAO discussions are included in the Semi-Annual Report to Management as they apply to each of the above sections.*
- c) *Semi-Annual Report for periods 7/1/2013 to 12/31/2013 and 1/1/2014 to 6/30/2014 will be revised to specifically address QAO discussion. Actionee: A. Morse Due Date: 02-25-2015*

2. *The conclusion of this extent of condition analysis is the Semi-Annual Report to Management shall include discussion on each specific item identified in MP-TRUW-8.26, Section 3.1.1. No further Remedial action is required.*

**Evaluation:**

As described, the remedial action is deemed appropriate.

**INVESTIGATIVE ACTIONS**

See Remedial Actions above.

**Evaluation:**

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

**ROOT CAUSE DETERMINATION**

N/A

## CAR CONTINUATION SHEET

1. CAR No: 15-003

2. Activity No: A-15-01

3. Page 2 of 2

**ACTIONS TO PREVENT RECURRENCE***Actionee: A. Morse Due Date: 03-31-2015*

*In accordance with MP-TRUW-8.26, Reports to Management, the Semi-Annual Report to Management for period 07/01/14 through 12/31/14 will be revised to include a separate section on discussion of whether Quality Assurance Objectives (QAOs) have been met and any resulting impact on decision making.*

**Evaluation:**

The corrective action to revise the Semi-Annual Report to Management for period 07/01/14 through 12/31/14 to include a separate section on discussion of whether Quality Assurance Objectives (QAOs) have been met and any resulting impact on decision making is deemed appropriate.

**COMMITMENTS**

*Revise Semi-Annual Report for periods 7/1/2013 to 12/31/2013 and 1/1/2014 to 6/30/2014 to specifically address QAO discussion.*

**DUE DATES**

February 25, 2015

*Revise the Semi-Annual Report to Management for period 07/01/14 through 12/31/14 to include a separate section on discussion of whether Quality Assurance Objectives (QAOs) have been met and any resulting impact on decision making.*

March 31, 2015

**ACCEPTANCE**

Contingent upon the stipulation described above in the evaluation of the actions to prevent recurrence, the CAP is deemed appropriate. Therefore, it is recommended that the acceptance of the CAP for CAR 15-003 be approved provided the conditions specified in *Actions To Prevent Recurrence* are adequately addressed and included in the closure documentation.

12/11/14

Evaluation Performed By: Harley Kirschenmann

Date

## CAR CONTINUATION SHEET

1. CAR No: 15-004

2. Activity No: A-15-01

3. Page 1 of 2

**Section 16 – Acceptance of Proposed Corrective Action Plan for CAR 15-004**

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 15-004. The CAP was submitted via Idaho Treatment Group, LLC letter C-2014-0378, dated November 20, 2014, from Danny Nichols, President and AMWTP Project Manager, to Mr. Martin Navarrete, U.S. Department of Energy, Carlsbad Field Office.

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. *An extent of condition review was performed which determined the following:*
  - a) *Quality assurance documents were evaluated for requirements of a QA Surveillance Plan. MP-M&IA-17.3, Quality Assurance Surveillance, is the only document with the phrase 'QA Surveillance Plan.'*
  - b) *MP-M&IA-17.3, Section 3.2.1 states the QA Manager or Designee will annually establish a QA Surveillance Plan based on evaluation of identified criteria. Because 'QA Surveillance Plan' is capitalized, it is understood to be an actual documented activity versus an activity in preparation of completing Section 3.2.2 which is to ensure surveillances are entered and scheduled in TrackWise.*
  - c) *The intent of section 3.2.1 is to develop the list of surveillances for entry in TrackWise, not an actual documented plan.*
2. *The conclusion of this extent of condition analysis is that Section 3.2.1 is misleading due to capitalization of QA Surveillance Plan which is not the intent of this section nor is a QA Surveillance Plan required in any other document. No further Remedial action is required.*

**Evaluation:**

As described, the remedial action is deemed appropriate.

**INVESTIGATIVE ACTIONS**

See Remedial Actions above.

**Evaluation:**

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

**ROOT CAUSE DETERMINATION**

N/A

**ACTIONS TO PREVENT RECURRENCE**

*MP-M&IA-17.3, Quality Assurance Surveillance, Section 3.2.1 has been revised to remove 'QA Surveillance Plan' but maintains the activity to complete scheduling of surveillances. Any additional references to 'QA Surveillance Plan' in this procedure has also been addressed.*

**Evaluation:**

The corrective action to revise procedure MP-M&IA-17.3 is deemed appropriate.

**COMMITMENTS**

*Revise Procedure MP-M&IA-17.3, Quality Assurance Surveillance*

**DUE DATES**

*February 3, 2015*

### CAR CONTINUATION SHEET

1. CAR No: 15-004

2. Activity No: A-15-01

3. Page 2 of 2

**ACCEPTANCE**

Contingent upon the stipulation described above in the evaluation of the actions to prevent recurrence, the CAP is deemed appropriate. Therefore, it is recommended that the acceptance of the CAP for CAR 15-004 be approved provided the conditions specified in *Actions To Prevent Recurrence* are adequately addressed and included in the closure documentation.

*Cindi Castillo for*

*12/11/14*

Evaluation Performed By: Harley Kirschenmann

Date