



ENTERED

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

JAN 23 2015



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

Re: Issuance of CBFO Corrective Action Reports Identified During Surveillance  
S-15-14

Dear Mr. Hoff:

Carlsbad Field Office (CBFO) Surveillance S-15-14 of the Nuclear Waste Partnership Material Control and Stores Inventory Program was performed January 13-15, 2015. Enclosed are Corrective Action Reports (CARs) 15-023, 15-024, 15-025, and 15-026 addressing conditions adverse to quality identified during the surveillance.

Please provide a documented response for the CARs, ensuring that the required actions indicated in CAR Block 12 are addressed, including a schedule for completion of corrective actions.

CAR 15-023 identifies a concern viewed by CBFO as a Waste Isolation Pilot Plant (WIPP) site-wide training condition adverse to quality, not isolated to the stores inventory/warehouse department. A similar training concern was identified in CBFO Audit A-15-10 (CAR 15-014). CBFO expects investigative actions (extent of condition) of Nuclear Waste Partnership LLC (NWP) will include a review of all WIPP positions subject to the CBFO Quality Assurance Program Document. This should be a joint effort between NWP Managers and NWP Training.

Please return your response to me on or before the due date identified in Block 14a of the CAR forms.

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

Sincerely,

Dennis S. Miehl  
Senior Quality Assurance Specialist

Enclosures



Mr. Jon E. Hoff

-2-

JUN 03 2015

cc: w/enclosures

J. Franco, CBFO	*ED
D. Bryson, CBFO	ED
M. Brown, CBFO	ED
M. Navarrete, CBFO	ED
P. Allen, NWP	ED
B. McQuinn, NWP	ED
J. Blankenhorn, NWP	ED
J. Harris, NWP	ED
S. Kennedy, NWP	ED
S. Cassingham, NWP	ED
V. Cannon, NWP	ED
B. Allen, NWP	ED
S. Punchios, NWP	ED
S. Escareno-Soto, NWP/QA	ED
W. Ledford, NWP	ED
E. Harkness, NWP	ED
P. Hester, NWP	ED
B. Stubbs, NWP	ED
J. Vasquez, Skylla	ED
R. Allen, CTAC	ED
P. Martinez, CTAC	ED
B. Pace, CTAC	ED
C. Castillo, CTAC	ED
K. Martin, CTAC	ED
B. Prentiss, CTAC	ED
P. Hinojos, CTAC	ED
D. Sellmer, CTAC	ED
G. White, CTAC	ED

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

## CORRECTIVE ACTION REPORT

1. CAR No.: 15-025	2. Activity Report No.: S-15-14	3. Page 1 of 1
4. Controlling document: WP 15-PM3518	5. CBFO Assessment Team Leader: Dennis Miehl	
6. Responsible organization: NWP/Skylla Warehouse		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Joe Vasquez	
8. Requirement that is involved: WP 15-PM3518, Rev. 3. <i>Material Receiving</i> , Section 1.1.1 [A] and [B] state: "IC, perform the following: [A] Receive package, [B] Log into the Credit Card/Express Mail Log."		
9. Condition Adverse to Quality (CAQ): Warehouse stock items purchased on a P-Card are not logged into the Credit Card/Express Mail Log, as required.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required:  Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: WP-05	13b. CAR Initiator: <u>Bob Prentiss</u> (printed name) Bob Prentiss	Date: 01-20-15
14a. Response due date: 2-23-15		
14b. Required corrective action completion date: N/A		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Dennis Miehl</u> (printed name) Dennis Miehl		Date: 1-23-15
b. CBFO Quality Assurance Director: <u>Dennis S. Miehl FOR MRB</u> (printed name) Dennis S. Miehl FOR MRB		Date: 1-23-15
16. Acceptance of Proposed Corrective Actions: _____ (printed name)		Date: _____
17. Acceptance of Corrective Action Completion: _____ (printed name)		Date: _____
18. Closure: _____ (printed name)		Date: _____

## INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION PLAN

WASTE ISOLATION PILOT PLANT  
U.S. DEPARTMENT OF ENERGY  
Carlsbad Field Office

INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION PLAN IN  
RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY

You are requested to provide a corrective action plan in response to this corrective action report (CAR) by the due date identified in block 14a of the CAR. If this date cannot be met, provide a written request for extension to the assessment team leader (CAR block 5). This request must include justification for the delay and must be provided prior to the response due date (CAR block 14a).

The corrective action plan shall address the corrective actions indicated in CAR block 12. As appropriate, develop the plan in accordance with the following sequence and format:

In order to develop the corrective action plan, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # 15-025
  - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
  - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
  - C. **Root Cause Determination**-Identify the root cause of the condition as determined through investigative actions.
  - D. **Actions to Preclude Recurrence**-Identify the corrective actions required to address the root cause of the condition in order to preclude recurrence.
2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

**NOTE:** The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.

## CORRECTIVE ACTION REPORT

1. CAR No.: 15-024	2. Activity Report No.: S-15-14	3. Page 1 of 1
4. Controlling document: WP 15-PM3517	5. CBFO Assessment Team Leader: Dennis Miehls	
6. Responsible organization: NWP Engineering/Skylla Warehouse		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Joe Vasquez/Pete Allen	
8. Requirement that is involved: WP 15-PM3517, Rev. 26, <i>Stores Inventory Control</i> , Section 3.2.2 states: "CE, perform the following: [A] Review system inventory list for the following: Valid system designation; As needed, update requirements (e.g., storage and/or ES&H); As needed, update ML, QL, or PQC; Valid equipment number/description; Correct Min/Max levels; Obsolete inventory/duplicates; Equipment number first occurrence (when used on multiple equipment)."		
9. Condition Adverse to Quality (CAQ): The system inventory list provided to the Cognizant Engineer (CE) for review is not being adequately reviewed causing a misuse of existing storage space with obsolete items. For example: Equipment Number 74-U-046, Jack Leg. was discontinued per Engineering Change Order 13095. The Warehouse continues to store 64 associated spare parts (representing various quantities) for this obsoleted equipment.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required:  Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: WP-05	13b. CAR Initiator: <u>Bob Prentiss</u> (printed name) Bob Prentiss	Date: 01-20-15
14a. Response due date: 2-23-15		
14b. Required corrective action completion date: N/A		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Dennis Miehls</u> (printed name) Dennis Miehls		Date: 1-23-15
b. CBFO Quality Assurance Director: <u>Dennis S. Miehls FOR MRB</u> (printed name) Dennis S. Miehls FOR MRB		Date: 1-23-15
16. Acceptance of Proposed Corrective Actions: _____ (printed name)		Date: _____
17. Acceptance of Corrective Action Completion: _____ (printed name)		Date: _____
18. Closure: _____ (printed name)		Date: _____

**INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION PLAN****WASTE ISOLATION PILOT PLANT  
U.S. DEPARTMENT OF ENERGY  
Carlsbad Field Office****INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION PLAN IN  
RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY**

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The corrective action plan shall address the corrective actions indicated in CAR block 12. As appropriate, develop the plan in accordance with the following sequence and format:

In order to develop the corrective action plan, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # 15-024
  - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
  - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
  - C. **Root Cause Determination**-Identify the root cause of the condition as determined through investigative actions.
  - D. **Actions to Preclude Recurrence**-Identify the corrective actions required to address the root cause of the condition in order to preclude recurrence.
2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

**NOTE:** The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.

## CORRECTIVE ACTION REPORT

1. CAR No.: 15-026	2. Activity Report No.: S-15-14	3. Page 1 of 1
4. Controlling document: WP 15-PM3526	5. CBFO Assessment Team Leader: Dennis Miehls	
6. Responsible organization: NWP/Skylla Warehouse		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Joe Vasquez	
8. Requirement that is involved: WP 15-PM3526, <i>Receipt Discrepancies</i> . Section 2.4.3 states: "(NWP Buyer) Enter the item into the Commitment Tracking System (CTS). Also, Section 2.4.7 [C] states: "Close out the CTS; Section 2.5.2 states: "(IC) Enter the item into the CTS; and Section 2.7.2 states: "(IC) Close out the CTS."		
9. Condition Adverse to Quality (CAQ): Currently, Inventory Control and Nuclear Waste Partnership LLC (NWP) Buyer personnel are not entering the required items into the Commitment Tracking System, as required.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? ( If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? ( If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required:  Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: WP-05	13b. CAR Initiator: <u>Katie Martin</u> <small>(printed name)</small> Katie Martin	Date: <u>1-20-15</u>
14a. Response due date: <u>2-23-15</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>D. J. Mills</u> <small>(printed name)</small> Dennis Miehls		Date: <u>1-23-15</u>
b. CBFO Quality Assurance Director: <u>D. J. Mills</u> <small>(printed name)</small> Dennis S. Miehls FOR MRB		Date: <u>1-23-15</u>
16. Acceptance of Proposed Corrective Actions: _____ <small>(printed name)</small>		Date: _____
17. Acceptance of Corrective Action Completion: _____ <small>(printed name)</small>		Date: _____
18. Closure: _____ <small>(printed name)</small>		Date: _____

**INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION PLAN****WASTE ISOLATION PILOT PLANT  
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The corrective action plan shall address the corrective actions indicated in CAR block 12. As appropriate, develop the plan in accordance with the following sequence and format:

In order to develop the corrective action plan, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # 15-026
  - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
  - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
  - C. **Root Cause Determination**-Identify the root cause of the condition as determined through investigative actions.
  - D. **Actions to Preclude Recurrence**-Identify the corrective actions required to address the root cause of the condition in order to preclude recurrence.
2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

**NOTE:** The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.

## CORRECTIVE ACTION REPORT

1. CAR No.: 15-023	2. Activity Report No.: S-15-14	3. Page 1 of 2
4. Controlling document: WP 14-TR.01 WP 13-1 CBFO QAPD	5. CBFO Assessment Team Leader: Dennis Miehls	
6. Responsible organization: NWP Management <i>(See note on page 2)</i>		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Pam Hester, Joe Vasquez, & Tom Lichty	
8. Requirement that is involved: See continuation sheet.		
9. Condition Adverse to Quality (CAQ): See continuation sheet		
10. Suggested actions (Optional):		
11a. Significant CAQ? (If 'Yes', go to block 15b)      Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b)      Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related?      Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b)      Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218?      Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required:  Remedial?      Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative?      Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination?      Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Actions to Preclude Recurrence?      Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: TQ-06	13b. CAR Initiator: <u>Cindi Castillo</u> <i>(printed name)</i> Cindi Castillo	Date: <u>7/22/15</u>
14a. Response due date: <u>2-23-15</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Dennis Miehls</u> <i>(printed name)</i> Dennis Miehls		Date: <u>1-23-15</u>
b. CBFO Quality Assurance Director: <u>Dennis S. Miehls FOR MRB</u> <i>(printed name)</i> Dennis S. Miehls FOR MRB		Date: <u>1-23-15</u>
16. Acceptance of Proposed Corrective Actions: _____ <i>(printed name)</i>		Date: _____
17. Acceptance of Corrective Action Completion: _____ <i>(printed name)</i>		Date: _____
18. Closure: _____ <i>(printed name)</i>		Date: _____

## CAR CONTINUATION SHEET

1. CAR No: 15-023

2. Activity No: S-15-14

3. Page 2 of 2

**8. Requirement that is involved:**

WP 13-1, Rev. 35, *NWP Quality Assurance Program Description*, Section 1.2.1 states: "Qualification requirements for positions or job categories within NWP organizations will be established commensurate with the functions associated with the work performed."

WP 14-TR.01, *WIPP Training Program*, Rev. 14, Section 7.0 states: "Technical Training has adopted a DOE-approved methodology of Table-Top Job and Needs Analysis and Table-Top Training Program Design to determine content and training program design based on defined job requirements" and Section 7.1 states: "The analysis phase defines the training requirements for each specific job position. During the process, a validated task list will be developed and tasks will be selected for training."

CBFO QAPD, Rev. 11, Section 1.2.1A states: "The responsible organization shall analyze each job position to determine the task responsibilities of the position subject to the QAPD."

**9. Condition Adverse to Quality (CAQ):**

There was no evidence provided to confirm that a job analysis has been performed to establish training needs for current positions in the warehouse/inventory control.

Also, training requirements are not specified in the following NWP procedures for personnel performing work:

- WP 15-PM3500, *Equipment Held for Future Projects*
- WP 15-PM3509, *Utilization and Disposal of Excess/Surplus Government Personal Property*
- WP 15-PM3517, *Stores Inventory Control*
- WP 15-PM3518, *Material Receiving*
- WP 15-PM3525, *Preparation and Processing of Shipping Authorizations*
- WP 15-PM3526, *Receipt Discrepancies*

**NOTE:**

CAR 15-023 identifies a concern viewed by CBFO as a Waste Isolation Pilot Plant (WIPP) site-wide training condition adverse to quality, not isolated to the stores inventory/warehouse department. A similar training concern was identified in CBFO Audit A-15-10 (CAR 15-014). CBFO expects investigative actions (extent of condition) of Nuclear Waste Partnership LLC (NWP) will include a review of all WIPP positions subject to the CBFO Quality Assurance Program Document. This should be a joint effort between NWP Managers and NWP Training.

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In order to develop the corrective action plan, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # 15-023
  - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
  - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
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**NOTE:** The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.