

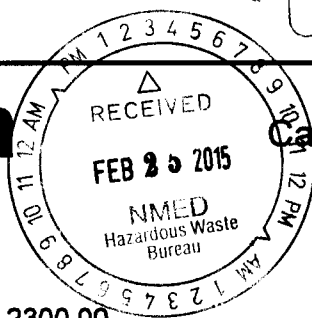
United States Government

Department of Energy

# memorandum

Carlsbad Field Office

Carlsbad, New Mexico 88221



DATE: FEB 25 2015

REPLY TO  
ATTN OF: CBFO:QAD:MPN:RMS:15-0656:UFC 2300.00

SUBJECT: Verification and Acceptance of Corrective Actions for CAR 15-004 from Recertification Audit A-15 -01 of the Advanced Mixed Waste Treatment Project

TO: Benjamine Roberts, DOE-ID

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 15-004. The results of the verification are documented on the attached CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions is acceptable.

The verification concluded that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 15-004 is considered closed.

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

Martin P. Navarrete  
Senior Quality Assurance Specialist

### Attachment

cc: w/attachment

M. Brown, CBFO	*ED	C. Smith, NMED	ED
J.R. Stroble, CBFO	ED	V. Daub, CTAC	ED
D. Miehl, CBFO	ED	R. Allen, CTAC	ED
N. Castaneda, CBFO	ED	P. Martinez, CTAC	ED
J. Zimmerman, DOE-ID	ED	B. Pace, CTAC	ED
J. Wells, DOE-ID	ED	H. Kirschenmann, CTAC	ED
T. Jenkins, DOE-ID	ED	K. Martin, CTAC	ED
D. Haar, AMWTP	ED	C. Castillo, CTAC	ED
G. Byram, AMWTP	ED	P. Hinojos, CTAC	ED
G. Tedford, AMWTP	ED	D. Sellmer, CTAC	ED
A. Morse, AMWTP	ED	G. White, CTAC	ED
L. Bender, EPA	ED	Site Documents	ED
J. Kieling, NMED	ED	CBFO QA File	
R. Maestas, NMED	ED	CBFO M&RC	
S. Holmes, NMED	ED	*ED denotes electronic distribution	

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**CAR CONTINUATION SHEET**

1. CAR No: 15-004

2. Activity No: A-15-01

3. Page 1 of 2

**Block # 17 & 18 Acceptance of Corrective Action Completion and Closure:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 15-004, including objective evidence and supporting documentation, submitted via Idaho Treatment Group letter C-2015-0062, Subject: Contract No. DE-EM0001467, Submittal of Completed Corrective Action Plan for CBFO CAR 15-004-DJR-21-15.

Italicized text, taken verbatim from the corrective action plan, is used to reflect the correlation between the actions required by the CAR and the method used for verification.

**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.*

**Verification:**

Verified remedial actions were completed through review of MP-M&IA-17.3, Revision 8, Sections 3.2.1 and 3.2.2. Section 3.2.1 of the procedure is misleading because of capitalization of "QA Surveillance Plan." Capitalization of "QA Surveillance Plan" implies a formal document exists rather than an activity for completing Section 3.2.2 which is to ensure surveillances are entered and scheduled in the electronic database of TrackWise. Further review of AMWTP QA program procedures for audits and surveillances identified that "QA Surveillance Plan" is not used in other assessment procedures.

The extent of condition analysis performed as part of the remedial actions is deemed appropriate to address the condition adverse to quality identified above.

It is verified that no further remedial actions are required.

**INVESTIGATIVE ACTIONS**

*See Remedial Actions above.*

**Verification:**

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

**CAR CONTINUATION SHEET**

1. CAR No: 15-004

2. Activity No: A-15-01

3. Page 2 of 2

**ROOT CAUSE DETERMINATION**

*None requested.*

**ACTIONS TO PRECLUDE 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 have also been addressed.*

Verification:

A review of MP-M&IA-17.3, *Quality Assurance Surveillance*, Revision 9, Sections 3.2.1 and 3.2.2 was performed which verified that "QA Surveillance Plan" has been removed; however, the procedure retains the activity to ensure surveillances are entered and scheduled in the electronic database TrackWise. Review of the remainder of the procedure and attachments was performed to verify that there were no additional references to "QA Surveillance Plan" in the procedure.

It was verified by review of Document Change Request (DCR) 13895 that the changes to procedure MP-M&IA-17.3 were reviewed and approved by the following disciplines: Environment, Safety & Health, Quality Assurance, Criticality Safety, Engineering, Maintenance, and TRU Programs. The DCR also identified that a training requirements determination was performed. The determination was that this change to the procedure does not introduce any technical content that would require personnel to acquire new knowledge or develop new skills to implement the change.

Based on the results of the review and verification of the objective evidence included in the CAR 15-004 closure package, it is recommended that CAR 15-004 be closed.

Verification Performed By: Cindi Castillo for  
 Harley Kirschenmann, Auditor

2/19/15  
 Date