



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



APR 24 2015

Mr. V.K. Cannon, Manager
 Quality Assurance
 Nuclear Waste Partnership LLC
 P.O. Box 2078
 Carlsbad, NM 88221-2078

Subject: Issuance of CBFO Corrective Action Reports 15-034, 15-035, 15-036 and 15-038 Identified During Audit A-15-12

Dear Mr. Cannon:

The Carlsbad Field Office (CBFO) performed Audit A-15-12 of the Nuclear Waste Partnership LLC/Central Characterization Program (NWP/CCP) Quality Assurance Program (All Sites) on April 7 – 9, 2015. Enclosed are four Corrective Action Reports (CARs 15-034, 15-035, 15-036 and 15-038) addressing the conditions adverse to quality identified during the audit.

Please provide a documented response for each CAR, ensuring that the required actions indicated in Block 12 are addressed, including a schedule for completion. Please return your responses 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, CBFO
 Senior Quality Assurance Specialist

Enclosures

cc: w/enclosures	
M. Brown, CBFO	*ED
M. Navarrete, CBFO	ED
J.R. Stroble, CBFO	ED
N. Castaneda, CBFO	ED
S.L. Ross, DOE/EM-43	ED



APR 24 2015

Mr. Cannon

-2-

F. Sharif, NWP	ED
M. Sensibaugh, NWP	ED
A.J. Fisher, NWP	ED
J. Carter, NWP	ED
B. Allen, NWP	ED
W. Ledford, NWP	ED
S. Punchios, NWP	ED
S. Escareno-Soto, NWP	ED
T. Peake, EPA	ED
L. Bender, EPA	ED
S. Holmes, NMED	ED
R. Maestas, NMED	ED
C. Smith, NMED	ED
V. Daub, CTAC	ED
R. Allen, CTAC	ED
P. Martinez, CTAC	ED
B. Pace, CTAC	ED
T. Ackman, CTAC	ED
C. Castillo, CTAC	ED
J. Walsh, CTAC	ED
H. Kirschenmann, CTAC	ED
P. Gomez, CTAC	ED
P.Y. Martinez, 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

CORRECTIVE ACTION REPORT

1. CAR No.: 15-034	2. Activity Report No.: A-15-12	3. Page 1 of 1
4. Controlling document: CCP-QP-010, Rev. 25	5. CBFO Assessment Team Leader: Dennis S. Miehl	
6. Responsible organization: Nuclear Waste Partnership LLC/Central Characterization Program (NWP/CCP)		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Jose Payanes	
8. Requirement that is involved: CCP-QP-010, Section, 3.10.4 [A]: "The SPM, QA, CCP Manager, and DOE/CBFO Manager reviews and approves CCP-PO-006. The DOE/CBFO Manager signs the cover sheet."		
9. Condition Adverse to Quality (CAQ): There is no evidence that the DOE/CBFO Manager signed the cover sheet of procedure CCP-PO-006, Rev. 4, <i>CCP Conduct of Operations Matrix</i> .		
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: DC-05	13b. CAR Initiator: <u>Amara D. Ackman</u> (printed name) Jack Walsh	Date: 04/23/15
14a. Response due date: <u>5-8-15</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): (printed name) <u>Dennis S. Miehl</u>	Date: <u>4-23-15</u>	
b. CBFO Quality Assurance Director: (printed name) <u>Michael P. Brown</u>	Date: <u>4/23/15</u>	
16. Acceptance of Proposed Corrective Actions: _____ (printed name) _____		
17. Acceptance of Corrective Action Completion: _____ (printed name) _____		
18. Closure: _____ (printed name) _____		

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 # 15-034
 - 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.: 15-035	2. Activity Report No.: A-15-12	3. Page 1 of 1
4. Controlling document: CCP-QP-005, Rev. 24	5. CBFO Assessment Team Leader: Dennis S. Miehls	
6. Responsible organization: Nuclear Waste Partnership LLC/Central Characterization Program (NWP/CCP)		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Laura Jones, Wayne Ledford	
8. Requirement that is involved: CCP-QP-005, Rev. 24, CCP TRU Nonconforming Item Reporting and Control: 1. Section 4.1.3[A]: "NCR Originator...complete Blocks 1 through 7, as applicable, of the NCR (see Attachment 2, Instructions for Completing Attachment 1, Nonconformance Report [NCR])" 2. Attachment 2 - Instructions for Completing Attachment 1, Nonconformance Report (NCR), Block 2: "NCR Originator... Enter kind of process. Choose one or a combination from the following: AK, CRMU Project, DA, Exterior Surface Radiological Survey, FGA, GGTP, HE-RTR, Lot Evaluation, MOVER, NDA, NDE, OSRP, Radiochemistry, Receipt Inspection, RH-DTC, RH-NDE, RH-RTR, RH-Sampling, RH-VE, Solids Analysis, Surface Finish, Testing, Transportation, VE, WCO, WWIS/WDS, Other. If not applicable, enter 'N/A.'" 9. Condition Adverse to Quality (CAQ): The NCR originator entered "RH-DG" to answer Block # 2 of NCR-RHANL-0317-14, Rev. 0. "RH-DG" is not a process choice listed in the instructions for completing an NCR (Attachment 2 of CCP-QP-005, Rev. 24, CCP TRU Nonconforming Item Reporting and Control). 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-02	13b. CAR Initiator: <u>Cindi Castillo</u> (printed name) Cindi Castillo	Date: 4/22/15
14a. Response due date: 5-8-15		
14b. Required corrective action completion date: N/A		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>D. S. Miehls</u> (printed name) Dennis S. Miehls		Date: 4-23-15
b. CBFO Quality Assurance Director: <u>Michael R. Brown</u> (printed name) Michael R. Brown		Date: 4/23/2015
16. Acceptance of Proposed Corrective Actions:		Date:
17. Acceptance of Corrective Action Completion:		Date:
18. Closure:		Date:

INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION PLAN

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

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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 # 15-035
 - 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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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.: 15-036	2. Activity Report No.: A-15-12	3. Page 1 of 1
4. Controlling document: CCP-QP-016, Rev. 20	5. CBFO Assessment Team Leader: Dennis S. Miehl	
6. Responsible organization: Nuclear Waste Partnership LLC/Central Characterization Program (NWP/CCP)		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Wayne Ledford, Chris Sexton and Ray McGinnis	
8. Requirement that is involved: CCP-QP-016, Rev. 20, Section 4.2.4[B]: "IDC M&TE Module notifies VPM or Designee and Quality Assurance (QA) within 60 days of expiration of M&TE calibration for recall using the recall notification e-mails."		
9. Condition Adverse to Quality (CAQ): The audit team was unable to obtain objective evidence indicating that the Vendor Project Manager (VPM) or designee and CCP QA at the Oak Ridge National Laboratory (ORNL) are on distribution of the Integrated Data Center (IDC) Measuring and Test Equipment (M&TE) Module-generated e-mails for the 60-day M&TE recall notifications.		
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: MT-05	13b. CAR Initiator: <i>Jennifer Ackner for</i> (printed name) Harley Kirschenmann	Date: 04/22/15
14a. Response due date: 5-8-15		
14b. Required corrective action completion date: N/A		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <i>[Signature]</i> (printed name) Dennis S. Miehl		Date: 4-23-15
b. CBFO Quality Assurance Director: <i>[Signature]</i> (printed name) Michael R. Brown		Date: 4/23/2015
16. Acceptance of Proposed Corrective Actions: _____ (printed name)		Date: _____
17. Acceptance of Corrective Action Completion: _____ (printed name)		Date: _____
18. Closure: _____ (printed name)		Date: _____

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1. Corrective action response for CAR # 15-036
 - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
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CAR CONTINUATION SHEET

1. CAR No: 15-038

2. Activity No: A-15-12

3. Page 2 of 2

Block # 8 Requirement that is involved:

CCP-QP-014, Rev. 6, *CCP QA Trend Analysis and Reporting*, Section 4.3 – Creating the Trend Report; Section 4.3.1, “Create the Semiannual Trend Report, using the trend report format example shown in Attachment 2 as guidance.”

Section 4.3.3, “Review the Semiannual Trend Report from each site, and, if acceptable, obtain the QA Engineer’s signature and date, and add Assurance Programs Manager signature and date. If unacceptable, return to the QA Engineer for correction.”

Block # 9 Condition Adverse to Quality (CAQ):

The Semiannual Trend Reports for various host sites are required to be generated and reviewed by the Assurance Programs Manager. Only the host sites that have a QA Engineer are submitting Trend Reports semiannually. For January 2014 through June 2014 *and* July 2014 through December 2014, no Trend Reports were submitted from the following Host Sites: Savannah River Site (SRS), Hanford, Sandia National Laboratory (SNL), and Argonne National Laboratory (ANL).

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1. Corrective action response for CAR # 15-038
 - 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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