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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
MAY 07 2015



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

Subject: Approval of the CAP for CBFO CAR 15-033 from Recertification Audit
A-15-09 *Visual Examination Waste Item Identification and NCR Compliance*,
Oak Ridge National Laboratory Central Characterization Program

Dear Mr. Cannon:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 15-033. The results of the review indicate that the CAP is acceptable, as documented on the enclosed CAR Continuation Sheet.

Please provide notification and evidence supporting completion of the corrective actions detailed in the CAP so that verification may be performed.

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

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure



Mr. Cannon

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MAY 07 2015

cc:w/enclosure

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Site Documents	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 15-033

2. Activity No: A-15-09

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Block # 16 Acceptance of Proposed Correction Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 15-033. The CAP was submitted via Nuclear Waste Partnership LLC letter QA:15:00096 UFC:2300:00, dated April 27, 2015, from Mr. V. K. Cannon, Manager, Quality Assurance, to Mr. M. P. Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance Division.

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

CCP has taken the following actions to address the CAR condition:

- 1. CCP issued NCR-RHORN-0331-15 to obtain technical disposition and resolution for the additional waste items recorded in the Waste Description field on Attachment 1 to CCP-TP-500.*
- 2. CCP management briefed VE operators on the reported condition and the requirement to have an NCR before making data-affecting changes to characterization records, when the need for correction is first identified at the SPM signature (project office) release level.*
- 3. CCP management briefed all SPMs on the reported condition and the requirement for them to issue an NCR as the authorization for data-affecting changes to characterization records, when the need for correction is first identified at their signature release level.*

Actions 2.0 and 3.0 above are primarily directed toward recurrence prevention and are repeated in that section of this Corrective Action Plan. They are included in this section because they were the basis for involvement of VE operators and SPMs in resolution of the CAR condition.

Evaluation:

The remedial actions taken as described above are deemed appropriate.

INVESTIGATIVE ACTIONS

As discussed in the Root Cause section of this Corrective Action Plan, CCP investigation and analysis resulted in the identification of two changes to be made to CCP-TP-500:

- 1. A clarification that all contents of waste containers, including any packaging materials that are present, are to be recorded in the Waste Description field of Attachment 1.*
- 2. Addition of a requirement that the SPM is required to issue an NCR for any data-affecting nonconformances that are first identified during SPM review.*

As part of the CCP investigation into extent of condition, CCP also reviewed CCP-TP-508, CCP RH Standard Real-Time Radiography Inspection Procedure, the other NDE-related procedure used to characterize RH TRU Waste. This review showed that the second change to CCP-TP-500 listed above (for SPMs to issue NCRs) also needed to be added to CCP-TP-508.

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Extent

CCP performed an independent project-level re-review of the 92 RH VE and RH RTR BDRs generated since the beginning of 2013 to the present, across all active RH sites.

- Fifty-two (52) VE BDRs: 22 ANL, 3 INL, 23 ORNL, 3 SNL, and 1 SRS
- Forty (40) RTR BDRs: 22 INL and 18 SRS

The BDRs were reviewed for:

1. *Any other BDRs with changes similar to the two BDRs identified in the CAR (the CAR identified container numbers)*
2. *Any BDRs where data-affecting changes had been made to BDRs already turned over to project-level, without an initiating NCR*

The independent review resulted in the identification of five additional RH VE BDRs with the exact same changes as the two BDRs identified in the CAR. Changes to these five BDRs resulted from the same request from the SPM to the VE operators to add waste items to the corresponding VE Data Forms. All seven BDRs are listed in NCR-RHORNL-0331-15.

None of the remaining BDRs in the independent project-level review of 92 BDRs met either of the review criteria listed above. The extent of condition is limited to the seven RH VE BDRs in NCR-RHORNL-0331-15 (two of which were called out in the CAR, by the associated container number).

Impact

There was no technical impact from the additions made to the seven RH VE BDRs at the direction of the SPM (two of which are the ones identified in the CAR), because the changes resulted in a complete inventory of the waste items, on the associated VE Data Forms.

Evaluation:

The results of the investigative actions described above are deemed appropriate.

ROOT CAUSE

A causal analysis was performed for the issues identified on this CAR (see attached). Two causal factors were identified. (1) The VE procedure did not contain instructions to account for items placed in the container by the Host Site (AS B2 COB, Written Communication Content Less than Adequate, Incomplete/situation not covered) and (2) The instructions in the VE procedure were not specific enough regarding how changes to BDRs were to be made after initiation of the SPM review (AS B2 C05, Written Communication Content Less than Adequate, Ambiguous Instructions/Requirements).

The root cause for both issues was an inadequate level of detail in the VE procedure.

Evaluation:

The results of the root cause analysis described above are deemed appropriate.

CAR CONTINUATION SHEET

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ACTIONS TO PREVENT RECURRENCE

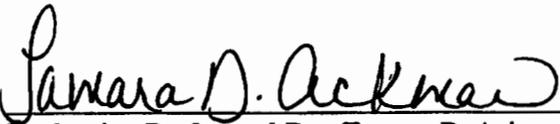
1. CCP management briefed VE operators on the reported condition and the requirement to have an NCR before making data-affecting changes to characterization records, when the need for correction is first identified at the SPM signature (project office) release level.
2. CCP management briefed all SPMs on the reported condition and the requirement for them to issue an NCR as the authorization for data-affecting changes to characterization records, when the need for correction is first identified at their signature release level.
3. CCP will revise CCP-TP-500 to:
 - a. Clarify that all contents of waste containers, including any packaging materials that are present, are to be captured in Attachment 1.
 - b. Include a requirement that the SPM is required to issue an NCR for any data-affecting nonconformances that are first identified during SPM review.
4. CCP will revise CCP-TP-508 to include a requirement that the SPM is required to issue an NCR for any data-affecting nonconformances that are first identified during SPM review.
5. CCP will issue a Lessons Learned describing the CAR condition and the lessons to be learned, taken from the information in the Root Cause section of this Corrective Action Plan.

Evaluation:

The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE

The results of the evaluation of the CAP indicate that the remedial actions, investigative actions, root cause analysis, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 15-033, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 15-033 be approved.



Evaluation Performed By: Tamara D. Ackman



Date: