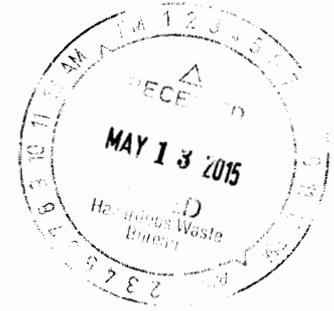




Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
MAY 13 2015



ENTERED

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

Subject: Evaluation of the CAP for CBFO CAR 15-035 *CCP Nonconformance Reporting Performance* Resulting from CBFO Audit A-15-12

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) 15-035, resulting from Audit A-15-12, Nuclear Waste Partnership LLC/Central Characterization Program (All Sites). As documented on the enclosed CAR Continuation Sheet, the evaluation indicates that the CAP is acceptable.

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

Sincerely,

Dennis S. Miehls
 Senior Quality Assurance Specialist

Enclosure

cc:w/enclosure

M. Brown, CBFO	*ED	L. Bender, EPA	ED
M. Navarrete, CBFO	ED	S. Holmes, NMED	ED
J.R. Stroble, CBFO	ED	R. Maestas, NMED	ED
N. Castaneda, CBFO	ED	C. Smith, NMED	ED
P. Breidenbach, NWP	ED	V. Daub, CTAC	ED
J. Blankenhorn, NWP	ED	R. Allen, CTAC	ED
J. Harris, NWP	ED	P. Martinez, CTAC	ED
S. Kennedy, NWP	ED	B. Pace, CTAC	ED
F. Sharif, NWP	ED	T. Ackman, CTAC	ED
M. Sensibaugh, NWP	ED	C. Castillo, CTAC	ED
A.J. Fisher, NWP	ED	P. Hinojos, CTAC	ED
J. Carter, NWP	ED	G. White, CTAC	ED
B. Allen, NWP	ED	Site Documents	ED
W. Ledford, NWP	ED	CBFO QA File	
S. Punchios, NWP	ED	CBFO M&RC	
S. Escareno-Soto, NWP	ED	*ED denotes electronic distribution	
T. Peake, EPA	ED		



CAR CONTINUATION SHEET

1. CAR No: 15-035

2. Activity No: A-15-12

3. Page 1 of 2

Block # 16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 15-035. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:15:00113 UFC:2300.00, dated May 7, 2015, from Mr. V. K. Cannon, Manager, NWP Quality Assurance, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, Carlsbad Field Office, 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.

REQUIREMENT THAT IS INVOLVED

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.'"

CONDITION ADVERSE TO QUALITY

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).

REMEDIAL ACTIONS

As described in the Investigative Actions section below, CCP does not propose any remedial actions for this issue.

Evaluation:

The evaluator agrees with the above statement.

INVESTIGATIVE ACTIONS***Extent***

The process code "RH-DG" was added to the Integrated Data Center (IDC) on January 27, 2014 as a result of Data Change Request (DCR) 2014-1460. This request was made by NWP QA in order to process NCR-RHANL-0317-14, which was the first NCR initiated during implementation of the process described in CCP-TP-513, CCP Procedure for Dimensional or Gravimetric Measurement for Radiological Characterization of Remote-Handled Transuranic Waste.

The IDC was queried to determine how many NCRs had been assigned the "RH-DG" process code. Two were identified (NCR-RHANL-0317-14 and NCR-RHANL-0320-14).

The process codes available in IDC were reviewed against those listed in Attachment 2 of CCP-QP-005. RH-DG and headspace gas (HSG) process codes are available in IDC but are not listed in CCP-QP-005. The HSG process codes need to remain in IDC so NCRs that were associated with HSG can be queried (HSG has been deleted from the Permit and all CCP HSG procedures have been obsoleted).

The instructions for initiating an NCR contained in Attachment 2 to CCP-QP-005 were reviewed. The current instructions are too restrictive. It should not require a procedure revision to add a process code for use in initiating an NCR.

Impact

There is no technical impact from the use of a process code that is not listed in CCP-QP-005. The main use of the process code is to be able to query the NCR population to determine what NCRs have been issued in a particular process area. In the case of NCR-RHANL-0317-14 and NCR-RHANL-0320-14 RH-DG is the correct process identifier.

Therefore, CCP does not propose any remedial actions to revise the process codes on NCR-RHANL-0317-14 and NCR-RHANL-0320-14.

CAR CONTINUATION SHEET

1. CAR No: 15-035

2. Activity No: A-15-12

3. Page 2 of 2

Evaluation:

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

ROOT CAUSE DETERMINATION

Not requested for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

1. CCP will revise CCP-QP-005 to clarify that the list of process codes are not all inclusive and provide direction to initiate a DCR to have a new process code added to IDC when necessary.

Commitments

CCP to revise CCP-QP-005

Provide closure documentation to NWP Quality Assurance.

NWP QA, transmit closure documentation to the CBFO.

Due Dates

August 7, 2015

August 12, 2015

August 18, 2015

Evaluation:

The actions to preclude recurrence are acceptable on the condition that supporting documentation for commitments listed above is included in the CAR closure package.

ACCEPTANCE

The results of the evaluation of the CAP indicate that the investigative actions and the proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 15-035, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 15-035 be approved.

Cindi Castillo

Evaluation Performed By: Cindi Castillo

5/11/15

Date