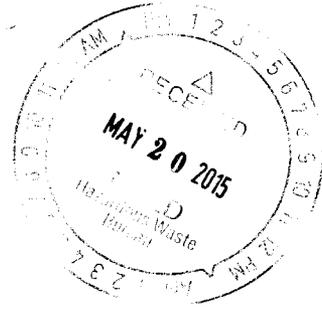




ENTER

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
MAY 20 2015



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 15-036 *CCP M&TE Recall Notification 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) 15-036, 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

150533



Mr. Val Cannon

-2-

MAY 20 2015

cc:w/enclosure
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J. R. Stroble, CBFO ED
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Site Documents ED
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 15-036

2. Activity No: A-15-12

3. Page 1 of 2

Block #16 Acceptance of Proposed Corrective Actions:

The Carlsbad Field Office (CBFO) has reviewed the Corrective Action Plan (CAP) developed to address CBFO Corrective Action Report (CAR) 15-036. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:15:00118, UFC:2300.00, dated May 11, 2015, from V. K. Cannon, Manager, NWP Quality Assurance, to Mr. D. S. Miehs, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

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 remedial actions:

1. *During the audit, CCP activated ORNL in the M&TE module in the IDC, so that the VPM and QA at ORNL began receiving 60-day recall notifications.*
2. *CCP activated Sandia National Laboratory (SNL) in the M&TE module in the IDC.*
3. *CCP confirmed that (with the addition of ORNL and SNL) the M&TE module is now active for all Host locations where CCP is currently performing work.*

Evaluation:

During the audit, the audit team verified that ORNL and SNL were activated in the M&TE module so that the respective VPM and QA organizations receive the 60-day recall notifications generated by the M&TE module. The extent of condition analysis performed as part of the remedial actions is deemed appropriate to address the condition adverse to quality identified in the CAR.

INVESTIGATIVE ACTIONS

The condition occurred because Waste Information Tracking Systems (WITS) group was not notified to activate the M&TE module for ORNL when CCP returned to begin performing characterization in October 2013. WITS is responsible for maintaining the IDC on behalf of NTP/CCP. There was nothing in the CCP Program to trigger activation of 60-day recall notifications to ORNL when CCP redeployed to the Host location.

Extent

CCP confirmed that, with the addition of ORNL and SNL, the M&TE module is now active for all Host locations where CCP is currently performing work: ANL, INL, LANL, ORNL, and SNL. The extent of the CAR condition is limited to ORNL and SNL.

Impact

The 60-day notification emails serve as defense-in-depth to ensure that CCP M&TE is recalled and recalibrated before its calibration interval expires.

Controls for M&TE in general:

- *CCP-QP-016 requires that the M&TE user: 1) verify that the M&TE is on the current approved M&TE list on the sftp site (searchable by equipment number) and 2) check the current calibration sticker on the M&TE with the information on the approved list, for accuracy.*

Additional control for M&TE that is calibrated by the Host location:

- *CCP M&TE that is calibrated by the Host location is included in the recall program managed by the Host location, so recalls are made by the Host location in accordance with internal procedure requirements.*

Even without the 60-day recall notifications from the M&TE module, there are two or three checks to ensure that all M&TE used by CCP is in current calibration prior to use. The multiple layers of control applied to the calibration of CCP M&TE are sufficient to ensure that there is no technical or quality impact from the CAR condition.

CAR CONTINUATION SHEET

1. CAR No: 15-036

2. Activity No: A-15-12

3. Page 2 of 2

Evaluation:

During the audit, the audit team verified that the VPM and QA organizations at Host locations ANL, INL, and LANL were receiving the 60-day recall information generated by the M&TE module. The addition of ORNL and SNL confirms that the M&TE module is active for all Host sites where CCP is currently performing work. The investigative actions described and verified during the audit are deemed appropriate to address the condition adverse to quality identified in the CAR.

ROOT CAUSE DETERMINATION

None requested.

ACTIONS TO PRECLUDE RECURRENCE

1. CCP will develop a deployment guide that addresses the various actions required when CCP deploys (or redeploys) at a Host location.
2. CCP will develop a demobilization guide that addresses the various actions required when CCP demobilizes from a Host location.

Evaluation:

The actions for development of deployment and demobilization documents to preclude recurrence are deemed appropriate to address the condition adverse to quality identified in the CAR.

COMMITMENTS

DUE DATE

<i>CCP to activate ORNL in the M&TE module in the IDC, so that the VPM and QA at ORNL began receiving 60-day recall notification (completed during the audit).</i>	<i>Complete</i>
<i>CCP to activate Sandia National Laboratory (SNL) in the M&TE module in the IDC.</i>	<i>Complete</i>
<i>CCP to develop a deployment guide that addresses the various actions required when CCP deploys (or redeploys) at a Host location.</i>	<i>June 4, 2015</i>
<i>CCP to develop a demobilization guide that addresses the various actions required when CCP demobilizes from a Host location.</i>	<i>June 4, 2015</i>
<i>Provide closure documentation to NWP Quality Assurance.</i>	<i>June 10, 2015</i>
<i>NWP QA, transmit closure documentation to the CBFO.</i>	<i>June 15, 2015</i>

ACCEPTANCE

Contingent upon the stipulation described above in the evaluation of Actions to Preclude Recurrence, the CAP is deemed appropriate. Therefore, it is recommended that the acceptance of the CAP for CAR 15-036 be approved, provided the conditions specified in Actions to Preclude Recurrence are adequately addressed and included in the closure documentation.

Evaluation Performed By: *Samara D. Ackman for*
 Harley Kirschenmann, Auditor

05/19/15
 Date