



ENTERED



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
**JUN 11 2015**

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

Subject: Verification and Acceptance of Corrective Actions for CAR 15-033 *VE Waste Item Identification & NCR Compliance* from Audit A-15-09, Oak Ridge National Laboratory Central Characterization Program

Dear Mr. Cannon:

The Carlsbad Field Office has completed its review and verification of completion of the corrective actions associated with Corrective Action Report (CAR) 15-033. The results of the verification are documented on the enclosed CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions is acceptable.

The evaluation concluded that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 15-033 is considered closed.

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

Sincerely,

A handwritten signature in black ink, appearing to read "D. J. Mills".

Martin P. Navarrete <sup>FOR</sup>  
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure

M. Brown, CBFO	* ED
J.R. Stroble, CBFO	ED
D. Miehl, CBFO	ED
G. Birge, CBFO	ED
N. Castaneda, CBFO	ED
S. Cange, DOE-OR	ED
L. Wilkerson, DOE-OR	ED
P. Breidenbach, NWP	ED
J. Blankenhorn, NWP	ED
J. Harris, NWP	ED
F. Sharif, NWP/CCP	ED
D. E. Gulbransen, NWP/CCP	ED
A.J. Fisher, NWP/CCP	ED
W. Ledford, NWP/CCP	ED
J. Carter, NWP/CCP	ED
B. Allen, NWP/QA	ED
S. Punchios, NWP/QA	ED
A. Boyea, NWP/QA	ED
T. Peake, EPA	ED
L. Bender, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
J. Kieling, NMED	ED
R. Maestas, NMED	ED
S. Holmes, NMED	ED
C. Smith, NMED	ED
V. Daub, CTAC	ED
R. Allen, CTAC	ED
P. Martinez, CTAC	ED
B. Pace, CTAC	ED
R. Castillo, CTAC	ED
R. Bradford, CTAC	ED
T. Ackman, CTAC	ED
R. Reeves, NWP/CCP	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
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 # 17 & 18 Acceptance of Corrective Action Completion and Closure:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 15-033, including objective evidence and supporting documentation submitted via Nuclear Waste Partnership LLC (NWP) letter QA:15:00116 UFC:2300.00, from V. K. Cannon to M. P. Navarrete, subject: "TRANSMITTAL OF THE DOCUMENTATION SUPPORTING COMPLETION OF THE CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 15-033, WHICH RESULTED FROM CBFO AUDIT A-15-09, OAK RIDGE NATIONAL LABORATORY CENTRAL CHARACTERIZATION PROGRAM," dated May 11, 2015, and NWP letter QA:15:00124 UFC:2300.00, from V. K. Cannon to M. P. Navarrete, subject: "TRANSMITTAL OF THE SUPPLEMENTAL DOCUMENTATION SUPPORTING COMPLETION OF THE CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 15-033, WHICH RESULTED FROM CBFO AUDIT A-15-09, OAK RIDGE NATIONAL LABORATORY CENTRAL CHARACTERIZATION PROGRAM," dated May 19, 2015.

*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-RHORNL-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.*

**Verification:**

The following documents were reviewed as verification for completion of Remedial Actions:

- NCR-RHORNL-0331-15
- CCP-TP-500, Rev. 14, Brief – Response to CAR 15-033 and CCP Attendance Sheet for CCP-TP-500, Rev. 14, Brief – CAR 15-033
- Email from M. Ramirez to A. Fisher indicating a staff meeting with SPMs, WCOs, and WCAs
- CCP Lessons Learned Number LL-2015-03, Individuals Identifying a Condition Adverse to Quality at Project Level Shall Initiate a Nonconformance Report (NCR) and the Acknowledgment of LL-2015-03

Remedial actions were satisfactorily completed as stated.

**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.*

**CAR CONTINUATION SHEET**

1. CAR No: 15-033

2. Activity No: A-15-09

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*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.*

**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.*

**Verification:**

The following documents were reviewed as verification for completion of investigative actions:

- CCP-TP-500, Rev. 15, CCP Remote-Handled Waste Visual Examination, dated 05-06-2015
- CCP-TP-508, Rev. 11, CCP RH Standard Real-Time Radiography Inspection Procedure, dated 04-27-15
- CCP-TP-500, Rev. 14, Brief – Response to CAR 15-033, and CCP Attendance Sheet for CCP-TP-500, Rev. 14, Brief – CAR 15-033
- Email from M. Ramirez to A. Fisher indicating a staff meeting with SPMs, WCOs, and WCAs
- CCP Lessons Learned Number LL-2015-03, Individuals Identifying a Condition Adverse to Quality at Project Level Shall Initiate a Nonconformance Report (NCR) and the Acknowledgment of LL-2015-03
- Email from L. Nelson to A. Stallings, A. Harley, I. Joo, D. Moody, indicating review of RH ORNL VE BDRs

**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.*

## CAR CONTINUATION SHEET

1. CAR No: 15-033

2. Activity No: A-15-09

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Verification:

Root cause determination was evaluated and found to be acceptable, as documented in CBFO CAP acceptance letter CBFO:QAD:MPN:SG:15-0733:UFC:2300.00.

**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.

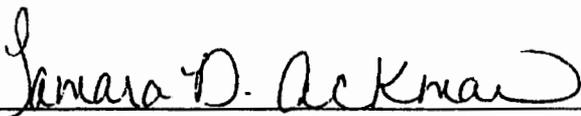
Verification:

The following documents were included in the closure package:

- NCR-RHORNL-0331-15
- Email from M. Ramirez to L. Jones indicating NCR-RHORNL-0331-15 is not a WIPP-reportable NCR
- CCP-TP-500, Rev. 14, Brief – Response to CAR 15-033, and CCP Attendance Sheet for CCP-TP-500, Rev. 14, Brief – CAR 15-033
- Email from M. Ramirez to A. Fisher indicating a staff meeting with SPMs, WCOs, and WCAs
- CCP Lessons Learned Number LL-2015-03, Individuals Identifying a Condition Adverse to Quality at Project Level Shall Initiate a Nonconformance Report (NCR) and the Acknowledgment of LL-2015-03
- CCP-TP-500, Rev. 15, CCP Remote-Handled Waste Visual Examination, dated 05-06-2015
- CCP-TP-508, Rev. 11, CCP RH Standard Real-Time Radiography Inspection Procedure, dated 04-27-15
- Email from L. Nelson to A. Stallings, A. Harley, I. Joo, D. Moody, indicating review of RH ORNL VE BDRs

Documents were reviewed and found to fully demonstrate completion of actions as stated in the approved "Actions to Preclude Recurrence" section of the CAR.

Based on the results of the review and verification of the objective evidence included in the CAR 15-033 closure package, it is recommended that CAR 15-033 be closed.



Verification Performed By: Tamara D. Ackman



Date