



**Department of Energy**

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

**JUN 24 2015**

ENTERED



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 15-036 CCP  
*M&TE Recall Notification Performance* from Audit A-15-12, Central  
Characterization Program – All Sites

Dear Mr. Cannon:

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 15-036. The results of the verification are documented on the enclosed CAR Continuation Sheet, and indicate that the documentation of completion of corrective actions is acceptable.

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

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

Sincerely,

Dennis S. Miehl  
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure

M. Brown, CBFO	*ED
M. Navarrete, CBFO	ED
J. R. Stroble, CBFO	ED
N. Castaneda, CBFO	ED
S. L. Ross, DOE/EM-43	ED
J. Britain, NWP	ED
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
A. Boyea, 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
P. Hinojos, CTAC	ED
H. Kirschenmann, CTAC	ED
G. White, CTAC	ED
Site Documents	ED

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

**CAR CONTINUATION SHEET**

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2. Activity No: A-15-12

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**Block # 17 & 18 Acceptance of Corrective Action Completion and Closure:**

The Carlsbad Field Office (CBFO) has reviewed the closure package developed to address CBFO Corrective Action Report (CAR) 15-036. The closure package, including objective evidence and supporting documentation, was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:15:00160, UFC:2300.00, dated June 12, 2015, from V.K. Cannon, Manager, NWP Quality Assurance, to Mr. D. S. Miehl, Senior Quality 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.*

**Verification:**

During the audit, it was verified by the audit team 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 above.

It is determined by this evaluation that no further remedial actions are required.

**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.*

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*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.*

Verification:

During the audit, the audit team verified that 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 now confirms that the M&TE module is active for all Host sites where CCP is currently performing work. The investigative actions as 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.

**COMMITMENTS**

**DUE DATE**

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).	Complete
CCP to activate Sandia National Laboratory (SNL) in the M&TE module in the IDC.	Complete
CCP to develop a deployment guide that addresses the June 4, 2015 various actions required when CCP deploys (or redeploys) at a Host location.	June 4, 2015
CCP to develop a demobilization guide that addresses the various actions required when CCP demobilizes from a Host location.	June 4, 2015
Provide closure documentation to NWP Quality Assurance.	June 10, 2015
NWP QA, transmit closure documentation to the CBFO.	June 15, 2015

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Verification:

It was verified that Standing Order CCP-SO-115, Rev.0, *CCP Deployment and Demobilization at Host Locations*, was developed and issued 6/4/2015 in accordance with CCP-PO-005, Rev. 26, *Conduct of Operations*. The Standing Order is applicable to Project Managers, Lead Site Project Managers and Configuration Management Engineers involved in deployment of CCP to a Host location, or demobilization from a Host location. The Standing Order introduces two new record forms (checklists), one of which is to be completed when CCP is deployed (or re-deployed) to a Host location and the when CCP demobilizations from a Host location. Instructions for completion of the record forms are also included in the Standing Order. Item 22 of the checklist titled, *CCP Deployment of Characterization to Host Site*, and item 14 of the checklist titled *CCP Demobilization of Characterization from Host Site*, adequately address the Site Project Management actions to ensure Waste Information Tracking System activation and deactivation, as appropriate, for M&TE recall notification.

**ACCEPTANCE**

Based on the review and evaluation of the objective evidence included in the CAR 15-036 closure package, it is recommended that CAR 15-036 be closed.

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

06/22/15  
Date