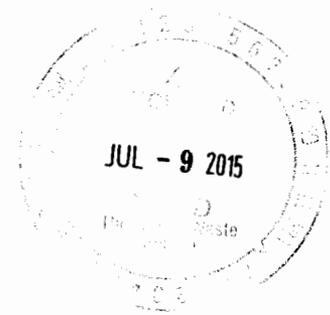




Department of Energy

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

JUL 09 2015



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

Subject: Issuance of CBFO CAR 15-050 Identified During Audit A-15-18

Dear Mr. Cannon:

The Carlsbad Field Office (CBFO) Audit A-15-18 of the Idaho National Laboratory Central Characterization Program was performed June 16 – 18, 2015. Enclosed is the Corrective Action Report (CAR) 15-050 addressing the condition adverse to quality identified during the audit.

Please provide documented responses for the CAR, ensuring that the required actions indicated in CAR Block 12 are addressed, including a schedule for completion of corrective actions. Please return your response to me on or before the due date identified in Block 14a of the CAR form.

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

Sincerely,

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure

M. Brown, CBFO	*ED
J.R. Stroble, CBFO	ED
M. Navarrete, CBFO	ED
G. Birge, CBFO	ED
N. Castaneda, CBFO	ED
J. Zimmerman, DOE-ID	ED
M. Wilcox, DOE-ID	ED
B. Roberts, DOE-ID	ED
P. Breidenbach, NWP	ED
J. Blankenhorn, NWP	ED
J. Britain, NWP	ED
F. Sharif, NWP	ED
D. E. Gulbransen, NWP	ED
A.J. Fisher, NWP	ED
W. Ledford, NWP	ED
J. Carter, NWP	ED
B. Allen, NWP	ED
S. Punchios, NWP	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
T. Ackman, CTAC	ED
P. Gomez, CTAC	ED
D. Blauvelt, CTAC	ED
B. Pyeatt, NWP	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
Site Documents	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CORRECTIVE ACTION REPORT

1. CAR No.: 15-050	2. Activity Report No.: A-15-18	3. Page 1 of 2
4. Controlling document: CCP-TP-005, Revision 26	5. CBFO Assessment Team Leader: Dennis Miehls	
6. Responsible organization: Idaho National Laboratory/Central Characterization Program (INL/CCP)		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Carrie Johnson, Scott Smith	
8. Requirement that is involved: See Continuation Sheet		
9. Condition Adverse to Quality (CAQ): See Continuation Sheet		
10. Suggested actions (Optional):		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: AK-06	13b. CAR Initiator: <u>Dick Blauvelt</u> <i>Dick Blauvelt</i> (printed name) Dick Blauvelt Date: <u>7/9/15</u>	
14a. Response due date: <u>7-24-15</u>		
14b. Required corrective action completion date: <u>8-7-15</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>D. S. Miehls</u> (printed name) Dennis S. Miehls		Date: <u>7-9-15</u>
b. CBFO Quality Assurance Director: <u>Michael R. Brown</u> (printed name) Michael R. Brown		Date: <u>7/9/2015</u>
16. Acceptance of Proposed Corrective Actions: _____ (printed name) _____ Date: _____		
17. Acceptance of Corrective Action Completion: _____ (printed name) _____ Date: _____		
18. Closure: _____ (printed name) _____ Date: _____		

CAR CONTINUATION SHEET

1. CAR No: 15-050

2. Activity No: A-15-18

3. Page 2 of 2

Block # 8 - Requirement That Is Involved

CCP-TP-005, R26, *CCP Acceptable Knowledge Documentation*, Section 4.9.1: "Document the nature of the discrepancy AND identify the documents involved for the particular waste stream or waste container on the Acceptable Knowledge Source Document Discrepancy Resolution or in the appropriate section of the AK Summary Report."

Section 4.9.16: "Complete, print name, sign, and date an Acceptable Knowledge Source Document Summary for each Acceptable knowledge Source Document Discrepancy Resolution."

Section 4.3.4: "Initiate an Acceptable Knowledge Source Document Summary for each source document that includes detail sufficient to justify the use of the information..."

CBFO QAPD, Rev. 11, Section 2.1.A: Work shall be performed in accordance with established technical standards and administrative controls.

Block # 9 - Condition Adverse to Quality (CAQ)

A discrepancy resolution (DR006) for waste stream IN-ID-BTO-030 was written to address the process steps used to solidify the fines generated during the destructive examination of post-irradiation fuel assemblies at Bettis. The DR documents an interview with two employees involved in this activity which contradicts the actual step-by-step process used to conduct the solidification. The narrative in the DR and the Attachment 3 Summary both contain an incorrect source document number for the step-by-step instructions. The resolution described in the DR, which is to follow the procedure in AK Source Document U221, is correct. In addition, AK Source Document (P132) describes another general contaminated liquid solidification process. The Attachment 3 AK source document summary indicates (incorrectly) that this process was used for the solidification.

INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION PLAN

WASTE ISOLATION PILOT PLANT
U.S. DEPARTMENT OF ENERGY
Carlsbad Field Office

INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION PLAN IN RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY

You are requested to provide a corrective action plan in response to this corrective action report (CAR) by the due date identified in block 14a of the CAR. If this date cannot be met, provide a written request for extension to the assessment team leader (CAR block 5). This request must include justification for the delay and must be provided prior to the response due date (CAR block 14a).

The corrective action plan shall address the corrective actions indicated in CAR block 12. As appropriate, develop the plan in accordance with the following sequence and format:

In order to develop the corrective action plan, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # 15-050
 - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
 - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
 - C. **Root Cause Determination**-Identify the root cause of the condition as determined through investigative actions.
 - D. **Actions to Preclude Recurrence**-Identify the corrective actions required to address the root cause of the condition in order to preclude recurrence.
2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

NOTE: The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.