

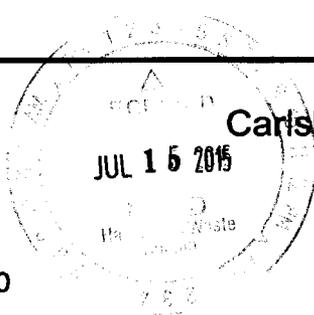


United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221



DATE: JUL 15 2015
REPLY TO:
ATTN OF: CBFO:OQA:MPN:SG:15-0794:UFC 2300.00

SUBJECT: Surveillance S-15-15, Verification of Corrective Actions for Closure of CARs 15-002 and 15-005

TO: Benjamine B. Roberts, DOE-ID

The Carlsbad Field Office (CBFO) conducted Surveillance S-15-15 at the Advanced Mixed Waste Treatment Project (AMWTP) June 2 – 4, 2015, to verify the effectiveness of corrective actions for CBFO Corrective Action Reports (CARs) 15-002 and 15-005, identified during AMWTP Recertification Audit A-15-01. The surveillance report is attached. The surveillance team determined the closure actions for CAR 15-002 were satisfactorily completed; therefore CAR 15-002 has been closed. Closure documentation has been transmitted under separate correspondence.

The closure actions for CAR 15-005 were found to be incomplete and the CAR remains open pending completion and verification of additional corrective actions. Rejection documentation has been transmitted under separate correspondence.

If you have any questions or comments concerning this surveillance report, please contact me at (575) 234-7483.

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment

cc: w/attachment

- | | | | |
|----------------------|-----|-------------------------------------|----|
| M. Brown, CBFO | *ED | J. Kieling, NMED | ED |
| J.R. Stroble, CBFO | ED | R. Maestas, NMED | ED |
| D. Miehl, CBFO | ED | S. Holmes, NMED | ED |
| N. Castaneda, CBFO | ED | C. Smith, NMED | ED |
| G. Birge, CBFO | ED | V. Daub, CTAC | ED |
| J. Zimmerman, DOE-ID | ED | R. Allen, CTAC | ED |
| M. Wilcox, DOE-ID | ED | P. Martinez, CTAC | ED |
| T. Jenkins, DOE-ID | ED | B. Pace, CTAC | ED |
| D. Haar, AMWTP | ED | G. Knox, CTAC | ED |
| G. Byram, AMWTP | ED | P. Hinojos, CTAC | ED |
| G. Tedford, AMWTP | ED | G. White, CTAC | ED |
| A. Morse, AMWTP | ED | Site Documents | ED |
| T. Peake, EPA | ED | CBFO QA File | |
| L. Bender, EPA | ED | CBFO M&RC | |
| E. Feltcorn, EPA | ED | *ED denotes electronic distribution | |
| R. Joglekar, EPA | ED | | |



CBFO SURVEILLANCE REPORT

Surveillance Number: S-15-15

Date of Surveillance: June 2 – 4, 2015

Surveillance Title: Advanced Mixed Waste Treatment Project (AMWTP) Verification of Corrective Actions for Corrective Action Reports (CARs) 15-002 and 15-005.

Organization: AMWTP

Surveillance Team:

Greg Knox	Team Leader, Carlsbad Field Office (CBFO) Technical Assistance Contractor (CTAC)
Katie Martin	Team Member, CTAC
Paul Gomez	Team Member, CTAC

Surveillance Scope:

The surveillance team evaluated the implementation and effectiveness of approved AMWTP corrective actions related to CBFO CARs 15-002 and 15-005, issued as a result of CBFO Audit A-15-01. The CARs were related to the periodic review process of AMWTP procedures and the identification of numerous instances of incomplete AMWTP training records.

Surveillance Results:

Activities Evaluated:

CAR 15-002

The approved corrective actions for CBFO CAR 15-002 were evaluated for implementation and effectiveness. CAR 15-002 identified the following condition adverse to quality:

Periodic reviews are not being performed (as required by the periodic intervals table) to assure AMWTP documents are maintained to accurately identify the content or processes specific to the activity addressed by the document. Examples of this concern are as follows:

1. The Periodic Review Past/Coming Due Report as of 09/30/2014 identifies 26 of 39 documents delinquent for periodic review. Several are overdue by 10 months or greater. This is a recurrence of an issue identified by AMWTP on CAR 77022, dated 4/10/13.
2. LST-RTQP-03-IM, Rev. 1, WIPP Training Requirements Implementation Matrix, has not been reviewed and updated, as required after the revision of MP-TRUW-8.2, *Quality Assurance Project Plan*.
3. INST-OI-12, Rev. 55, *Real-Time Radiography Examinations (Certification Scans)*, uses terms such as "headspace gas," which is no longer used in the current WIPP Hazardous Waste Facility Permit.
4. RPT-TRUW-06, Rev. 16, *Acceptable Knowledge Document for AMWTP Waste*, identifies operations with respect to special case waste, drummed waste handling

enclosure, and the drummed waste packaging glove-box; however, AMWTP does not perform these operations.

The surveillance team interviewed AMWTP Quality Assurance Manager Angela Morse during the surveillance, and reviewed the Subject Matter Expert evaluations of all AMWTP procedures for periodic review requirements. The team verified the AMWTP Electronic Data Management System (EDMS) identifies corrected and appropriate periodic review dates. All procedures in the EDMS that require periodic review were found to be current.

Based on the results of the surveillance, the corrective actions for CAR 15-002 were determined to be successfully implemented, adequate and effective. CAR closure documentation per Management Procedure (MP) 3.1 has been generated.

Governing Documents/Requirements:

- CBFO CAR 15-002
- AMWTP CAR closure documentation. (The CAP was submitted via Idaho Treatment Group, LLC, letter C-2014-0378, dated November 20, 2014, from Danny Nichols, President and AMWTP Project Manager, to Mr. Martin Navarrete, U.S. Department of Energy, Carlsbad Field Office. Approval of the CAP was transmitted to Mr. Benjamin Roberts, December 15, 2014, via Memorandum CBFO:QAD:MPN:LEC:14-2933:UFC 2300.00.)
- CBFO MP 3.1, *Corrective Action Reports*

CAR 15-005

The approved corrective actions for CBFO CAR 15-005 were evaluated for implementation and effectiveness. CAR 15-005 identified the following condition adverse to quality:

Numerous instances were noted regarding methods used for correcting record entries contrary to the requirements for correcting records as specified in MP-DOCS-18.2, Records Management. Additionally, numerous instances were noted regarding incomplete records. These instances were observed in records of various program disciplines, including real-time radiography, independent technical review, site project manager, non-destructive assay, acceptable knowledge, etc. A few examples include:

- RTR Biannual Container forms – obliterating information and no initial or date for corrections (multiple instances)
- Requalification Checklist – Level I Validation (ITR) for VE form – no initial or date for corrections and obliterating information
- SPM Requalification form – date was recorded rather than required initials.
- AKE Requalification & Level I Validation (ITR) for RTR – performance of on-the-job training (either simulated, performed or discussed) was not documented.

During the surveillance, the team interviewed Angela Morse, AMWTP Quality Assurance Manager, and Cameron Stamps, AMWTP Training Coordinator. The team reviewed two populations of training records. All the approximately 600 training records identified by

AMWTP as requiring corrections were reviewed and found to be satisfactorily corrected and complete. The team also reviewed a random sample of 201 of the approximately 1400 remaining training records that were deemed by AMWTP as not requiring correction and found 24 errors (approximately 12% of the sample population) requiring correction.

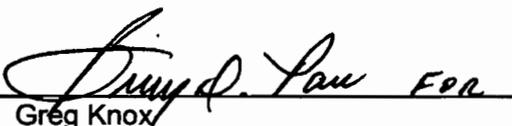
Based on the results of this surveillance, the team determined that the remedial and investigate actions taken for CAR 15-005 were inadequate and incomplete. Therefore, CAR 15-005 could not be recommended for closure. Documentation rejecting the AMWTP closure actions has been generated per MP 3.1.

Governing Documents/Requirements:

- CBFO CAR 15-005
- AMWTP CAR closure documentation (The CAP was submitted via Idaho Treatment Group, LLC, letter C-2014-0378, dated November 20, 2014, from Danny Nichols, President and AMWTP Project Manager, to Mr. Martin Navarrete, U.S. Department of Energy, Carlsbad Field Office. Approval of the CAP was transmitted to Mr. Benjamine Roberts, December 15, 2014, via Memorandum CBFO:QAD:MPN:LEC:14-2933:UFC 2300.00.)
- CBFO MP 3.1, *Corrective Action Reports*

Corrective Actions:

Although no conditions adverse to quality were identified during this surveillance, due to the inadequacy of remedial and investigative actions required for closure, CAR 15-005 will remain open pending additional corrective actions.

Surveillance Team Leader  Date: 6/29/15
Greg Knox

Assistant Manager/Office Director: _____ Date: _____

CBFO QA Director Approval  Date: 7-15-15
Michael R. Brown