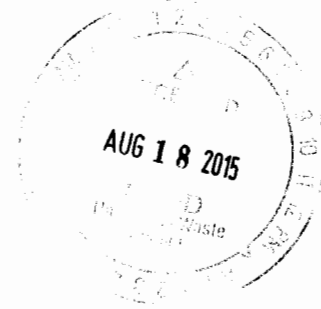




Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221

AUG 18 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 15-035 *CCP Nonconformance Reporting 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) 15-035. 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. 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	T. Peake, EPA	ED
M. Navarrete, CBFO	ED	L. Bender, EPA	ED
J. R. Stroble, CBFO	ED	S. Holmes, NMED	ED
N. Castaneda, CBFO	ED	R. Maestas, NMED	ED
G. Birge, CBFO	ED	C. Smith, NMED	ED
T. Carver, CBFO	ED	V. Daub, CTAC	ED
S. L. Ross, DOE/EM-43	ED	R. Allen, CTAC	ED
P. Breidenbach, NWP	ED	P. Martinez, CTAC	ED
J. Blankenhorn, NWP	ED	B. Pace, CTAC	ED
J. Britain, NWP	ED	T. Ackman, CTAC	ED
S. Kennedy, NWP	ED	C. Castillo, CTAC	ED
F. Sharif, NWP	ED	P. Hinojos, CTAC	ED
A. J. Fisher, NWP	ED	G. White, CTAC	ED
J. Carter, NWP	ED	Site Documents	ED
B. Allen, NWP	ED	CBFO QA File	
S. Punchios, NWP	ED	CBFO M&RC	
A. Boyea, NWP	ED	*ED denotes electronic distribution	



CAR CONTINUATION SHEET

1. CAR No: 15-035

2. Activity No: A-15-12

3. Page 1 of 2

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) 15-035, including objective evidence and supporting documentation submitted via Nuclear Waste Partnership (NWP) letter QA:15:00209 UFC:2300.00, from V. K. Cannon to Dennis S. Miehl on August 12, 2015.

Italicized text, taken verbatim from the corrective action plan, is used to reflect the correlation between the corrective actions and the method used for verification.

REQUIREMENT THAT IS INVOLVED

1. Section 4.1.3[A]: "NCR Originator...complete Blocks 1 through 7, as applicable, of the NCR (see Attachment 2, Instructions for Completing Attachment 1, Nonconformance Report [NCR]."

2. Attachment 2 – Instructions for Completing Attachment 1, Nonconformance Report (NCR), Block 2: "NCR Originator... Enter kind of process. Choose one or a combination from the following: AK, CRMU Project, DA, Exterior Surface Radiological Survey, FGA, GGTP, HE-RTR, Lot Evaluation, MOVER, NDA, NDE, OSRP, Radiochemistry, Receipt Inspection, RH-DTC, RH-NDE, RH-RTR, RH-Sampling, RH-VE, Solids Analysis, Surface Finish, Testing, Transportation, VE, WCO, WWIS/WDS, Other. If not applicable, enter 'N/A.'"

CONDITION ADVERSE TO QUALITY

The NCR originator entered "RH-DG" to answer Block # 2 of NCR-RHANL-0317-14, Rev. 0. "RH-DG" is not a process choice listed in the instructions for completing an NCR (Attachment 2 of CCP-QP-005, Rev. 24, CCP TRU Nonconforming Item Reporting and Control).

REMEDIAL ACTIONS

Previously reviewed and agreed upon in the CAP evaluation.

INVESTIGATIVE ACTIONS**Extent**

The process code "RH-DG" was added to the Integrated Data Center (IDC) on January 27, 2014 as a result of Data Change Request (DCR) 2014-1460. This request was made by NWP QA in order to process NCR-RHANL-0317-14, which was the first NCR initiated during implementation of the process described in CCP-TP-513, CCP Procedure for Dimensional or Gravimetric Measurement for Radiological Characterization of Remote-Handled Transuranic Waste.

The IDC was queried to determine how many NCRs had been assigned the "RH-DG" process code. Two were identified (NCR-RHANL-0317-14 and NCR-RHANL-0320-14).

The process codes available in IDC were reviewed against those listed in Attachment 2 of CCP-QP-005. RH-DG and headspace gas (HSG) process codes are available in IDC but are not listed in CCP-QP-005. The HSG process codes need to remain in IDC so NCRs that were associated with HSG can be queried (HSG has been deleted from the Permit and all CCP HSG procedures have been obsolete).

The instructions for initiating an NCR contained in Attachment 2 to CCP-QP-005 were reviewed. The current instructions are too restrictive. It should not require a procedure revision to add a process code for use in initiating an NCR.

Impact

There is no technical impact from the use of a process code that is not listed in CCP-QP-005. The main use of the process code is to be able to query the NCR population to determine what NCRs have been issued in a particular process area. In the case of NCR-RHANL-0317-14 and NCR-RHANL-0320-14 RH-DG is the correct process identifier.

CAR CONTINUATION SHEET

1. CAR No: 15-035

2. Activity No: A-15-12

3. Page 2 of 2

Therefore, CCP does not propose any remedial actions to revise the process codes on NCR-RHANL-0317-14 and NCR-RHANL-0320-14.

Verification:

Previously reviewed and agreed upon in the CAP evaluation.

ROOT CAUSE DETERMINATION

Not requested for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

1. CCP will revise CCP-QP-005 to clarify that the list of process codes are not all inclusive and provide direction to initiate a DCR to have a new process code added to IDC when necessary.

Commitments

CCP to revise CCP-QP-005

Provide closure documentation to NWP Quality Assurance.

NWP QA, transmit closure documentation to the CBFO.

Due Dates

August 7, 2015

August 12, 2015

August 18, 2015

Verification:

Newly revised CCP-QP-005, CCP TRU Nonconforming Item Reporting and Control, Revision 25, was submitted as the closure documentation. CCP-QP-005, Attachment 2, Instructions for Completing Attachment 1, Nonconformance Report (NCR), was revised to clarify that the list of process codes are not all inclusive. A note was added to Block 2 of Attachment 2 providing direction for the NCR Originator to initiate a Data Change Request (DCR) to have a new process code added to the Integrated Data Center (IDC), when necessary. The note states: "If additional applicable process codes are identified that are not on the example list, they may be added to the IDC using the Data Change Request process." The verbiage in the note is accurate and acceptable.

CLOSURE ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 15-035 closure package, it is recommended that CAR 15-035 be closed.

Cindi Castillo

Evaluation Performed By: Cindi Castillo

8/18/15

Date