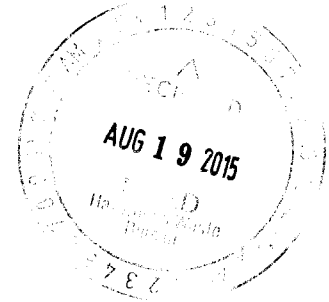




**Department of Energy**  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221

**AUG 19 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 15-038 *CCP QA Trend Analysis and 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) 15-038. 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 | S. Holmes, NMED                     | ED |
| M. Navarrete, CBFO    | ED   | R. Maestas, NMED                    | ED |
| J. R. Stroble, CBFO   | ED   | C. Smith, NMED                      | ED |
| N. Castaneda, CBFO    | ED   | V. Daub, CTAC                       | ED |
| G. Birge, CBFO        | ED   | R. Allen, CTAC                      | ED |
| T. Carver, CBFO       | ED   | P. Martinez, CTAC                   | ED |
| S. L. Ross, DOE/EM-43 | ED   | B. Pace, CTAC                       | ED |
| J. Britain, NWP       | ED   | T. Ackman, CTAC                     | ED |
| F. Sharif, NWP        | ED   | P. Y. Martinez, CTAC                | ED |
| A. J. Fisher, NWP     | ED   | P. Hinojos, CTAC                    | ED |
| J. Carter, NWP        | ED   | G. White, CTAC                      | ED |
| B. Allen, NWP         | ED   | Site Documents                      | ED |
| S. Punchios, NWP      | ED   | CBFO QA File                        |    |
| A. Boyea, NWP         | ED   | CBFO M&RC                           |    |
| T. Peake, EPA         | ED   | *ED denotes electronic distribution |    |
| L. Bender, EPA        | ED   |                                     |    |



**CAR CONTINUATION SHEET**

1. CAR No: 15-038

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) 15-038, including objective evidence and supporting documentation submitted via Nuclear Waste Partnership (NWP) letter QA:15:00210 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**

*CCP-QP-014, Rev. 6, CCP QA Trend Analysis and Reporting, Section 4.3 – Creating the Trend Report; Section 4.3.1, “Create the Semiannual Trend Report, using the trend report format example shown in Attachment 2 as guidance.”*

*Section 4.3.3, “Review the Semiannual Trend Report from each site, and, if acceptable, obtain the QA Engineer’s signature and date, and add Assurance Programs Manager signature and date. If unacceptable, return to the QA Engineer for correction.”*

**CONDITION ADVERSE TO QUALITY**

*The Semiannual Trend Reports for various host sites are required to be generated and reviewed by the Assurance Programs Manager. Only the host sites that have a QA Engineer are submitting Trend Reports semiannually. For January 2014 through June 2014 and July 2014 through December 2014, no Trend Reports were submitted from the following Host Sites: Savannah River Site (SRS), Hanford, Sandia National Laboratory (SNL), and Argonne National Laboratory (ANL).*

**REMEDIAL ACTIONS**

*As described in the Investigative Actions section below, CCP does not propose any remedial actions for this issue.*

**Verification:**

Previously reviewed and agreed upon in the CAP evaluation.

**INVESTIGATIVE ACTIONS**

*Trend reporting is covered in two CCP procedures (1) CCP-QP-014, CCP Quality Assurance Trend Analysis and Reporting and (2) CCP-QP-019, CCP Quality Assurance Reporting to Management. CCP-QP-014 describes the process for NWP Quality Assurance Engineers (QAEs) assigned to generator sites to prepare semiannual trend reports for the sites to which they are assigned. CCP-QP-019 describes the process for preparing a semiannual report to management for all active CCP sites to comply with the requirements of the CBFO QAPD, Appendix E.*

**Extent**

*There are NWP QAEs physically located at the generator sites with enough characterization activity occurring to justify a full-time QAE at the site. Currently these sites are Idaho National Laboratory (INL), Los Alamos National Laboratory (LANL), and Oak Ridge National Laboratory (ORNL). There are two sites where characterization activities are occurring, but the activities are not sufficient to justify a full-time QAE at the site: Argonne National Laboratory (ANL) and Sandia National Laboratory (SNL). There are also two sites that are currently certified, but where no characterization activities are occurring: Hanford and Savannah River Site (SRS).*

**Impact**

*For the active sites that do not have a full-time NWP QAE assigned, the trending data is contained in the Semi-Annual Reports to Management generated in accordance with CCP-QP-019.*

*Therefore, there is no adverse impact and CCP does not propose any remedial actions to address this issue (i.e., the existing trend reports will not be changed nor will separate trend reports for those sites without a full-time QAE be generated).*

**Verification:**

Previously reviewed and agreed upon in the CAP evaluation.

## CAR CONTINUATION SHEET

1. CAR No: 15-038

2. Activity No: A-15-12

3. Page 2 of 2

**ROOT CAUSE DETERMINATION**

CCP-QP-014 did not address the eventuality of an active generator site that did not have a full-time QAE assigned.

The applicable cause code from DOE Order 232.2 cause code is:

A5 B2 C08, Written Communication Content Less Than Adequate, Incomplete/situation not covered, Details of the written communication were incomplete. Insufficient information was presented. The written communication did not address situations likely to occur during the completion of the procedure.

**Verification:**

Previously reviewed and agreed in the CAP evaluation.

**ACTIONS TO PRECLUDE RECURRENCE**

1. CCP will revise CCP-QP-014 to clarify that trend reports will only be issued for sites with an assigned full-time QAE. The reports to management issued under CCP-QP-019 will continue to analyze data for all active generator sites.

**Commitments**

CCP to revise CCP-QP-014

Provide closure documentation to NWP Quality Assurance.

NWP QA, transmit closure documentation to the CBFO.

**Due Dates**

August 7, 2015

August 12, 2015

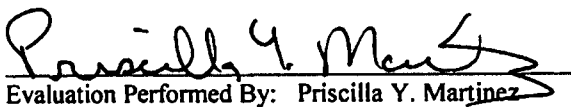
August 18, 2015

**Verification:**

CCP-QP-014, Rev. 7, CCP Quality Assurance Trend Analysis and Reporting, was revised to meet the concerns of this CAR and was issued 08/12/2015. Verification of the revision made and replacement of obsoleted procedure was verified. The supporting documentation for commitments listed above were included in the CAR closure package.

**CLOSURE ACCEPTANCE**

Based on the results of the review and verification of the objective evidence included in the CAR 15-038 closure package, it is recommended that CAR 15-038 be closed.

  
Evaluation Performed By: Priscilla Y. Martinez

8-19-15  
Date