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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
SEP 15 2015



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

Subject: Issuance of CBFO Corrective Action Report 15-063 Identified During Audit A-15-21

Dear Mr. Cannon:

The Carlsbad Field Office (CBFO) Audit A-15-21 of the Los Alamos National Laboratory Central Characterization Program was performed September 1 – 3, 2015. Enclosed is Corrective Action Report (CAR) 15-063 addressing the condition adverse to quality identified during the audit.

Please provide a documented response 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 regarding 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
D. Hintze, LAFO	ED
D. Nickless, LAFO	ED
M. Papp, LANL/CCP	ED
P. Breidenbach, NWP	ED
J. Blankenhorn, NWP	ED
J. Britain, NWP	ED
F. Sharif, NWP/CCP	ED
D. E. Gulbransen, NWP/CCP	ED
R. Reeves, NWP/CCP	ED
A.J. Fisher, NWP/CCP	ED
J. Carter, NWP/CCP	ED
C. Simmons, NWP/CCP	ED
B. Allen, NWP/QA	ED
S. Punchios, NWP/QA	ED
A. Boyea, NWP/QA	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
D. Blauvelt, CTAC	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.: 15-063		2. Activity Report No.: A-15-21		3. Page 1 of 2	
4. Controlling document: CCP-TP-005, R27		5. CBFO Assessment Team Leader: Dennis Miehl			
6. Responsible organization: LANL/CCP					
7a. CAQ/CAR Owner (Office Director): N/A			7b. CAQ was discussed with: Mike Papp/Jim Schoen		
8. Requirement that is involved: See Continuation Sheet					
9. Condition Adverse to Quality (CAQ): See Continuation Sheet					
10. Suggested actions (Optional): N/A					
11a. Significant CAQ? (If 'Yes', go to block 15b)			12. Type of actions required:		
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
11b. Work Suspension recommended? (If 'Yes', go to block 15b)			Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11c. RCRA related?			Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>					
11d. Accelerated corrective action required? (If 'Yes', go to block 15b)					
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>					
11e. Does this CAQ affect waste streams BNINW216 or BNINW218?					
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>					
13a. Trend Code: AK-05		13b. CAR Initiator: <u>Pimp D. Yaw For</u> Dick Blauvelt <small>(printed name)</small>		Date: 9/14/15	
14a. Response due date: 10-13-15					
14b. Required corrective action completion date: N/A					
15. Concurrence:					
a. Assessment Team Leader (if applicable): <u>D J Miehl</u> <small>(printed name)</small> Dennis S. Miehl			Date: 9-14-15		
b. CBFO Quality Assurance Director: <u>Michael R B</u> <small>(printed name)</small> Michael R. Brown			Date: 9/14/15		
16. Acceptance of Proposed Corrective Actions: _____				Date: _____	
<small>(printed name)</small>					
17. Acceptance of Corrective Action Completion: _____				Date: _____	
<small>(printed name)</small>					
18. Closure: _____				Date: _____	
<small>(printed name)</small>					

CAR CONTINUATION SHEET

1. CAR No: 15-063

2. Activity No: A-15-21

3. Page 2 of 2

Block # 8 - Requirement That Is Involved

CCP-TP-005, Rev. 27, *CCP Acceptable Knowledge Documentation*, Section 4.4.24: "For contact-handled (CH) waste streams and RH waste streams characterized using NDA techniques, review all source documents to determine the two most prevalent radionuclides for the waste stream, and estimated isotopic ratios for the following 10 WIPP-required radionuclides: Sr-90; Cs-137; U-233; U-234; U-238; Pu-238; Pu-239; Pu-240; Pu-242; and Am-241."

Section 4.4.28[B]: "See Attachment 7, Radionuclides - Example Form (CH only), for an example. Include the NDA Memorandum (signed by the AKE and NDA EA) described in step 4.4.25 as an addendum to Radionuclides."

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 4.9.11: "Assign or revise the identified radionuclides present, as necessary, **AND** document the change and the assumptions made on the Acceptable Knowledge Source Document Discrepancy Resolution."

Section 4.9.23: "Revise the AK Summary Report as needed."

Block # 9 - Condition Adverse to Quality (CAQ)

Discrepancy Resolution DR048 for waste stream LA-MHD01.001 identified a discrepancy regarding the range of reported weight percentages for U-232 as documented in the Acceptable Knowledge (AK) Summary Report, Rev. 11, and the AK Attachment 7, *Radionuclides*, with a number based on generator input of 1.29%, in contrast to the value of 54.69% based upon a nondestructive assay (NDA) result for a drum characterized from lot 323. The resolution was to revise the AK Summary Report and AK Attachment 7 to reflect the value from NDA, which is identified in Rev. 12 of the AK Summary Report. However, when Rev. 13 of the AK Summary Report and AK Attachment 7 were generated, the tables reflect the values presented in Rev. 11.

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 # 15-063
 - 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.