



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
NOV 03 2015

ENTERED



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

Subject: Evaluation of the Amended CAP for CBFO CAR 15-050 *Inaccuracies in AK Discrepancy Resolution* Resulting from CBFO Audit A-15-18

Dear Mr. Cannon:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the amended Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 15-050. As documented on the enclosed CAR Continuation Sheet, the evaluation indicates that the CAP is acceptable.

If you have any questions or comments concerning the evaluation, 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. Willcox, DOE-ID ED
 B. Roberts, DOE-ID ED
 F. Sharif, NWP/CCP ED
 D. E. Gulbransen, NWP/CCP ED
 A.J. Fisher, NWP/CCP ED
 I. Joo, NWP/CCP ED
 J. Carter, NWP/CCP ED
 P. Breidenbach, NWP ED
 J. Blankenhorn, NWP ED
 J. Britain, NWP ED
 B. Allen, NWP ED
 S. Punchios, NWP ED
 A. Boyea, NWP ED

S. Brotton, 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
 B. Pace, CTAC ED
 P. Martinez, CTAC ED
 T. Ackman, CTAC ED
 D. Blauvelt, CTAC ED
 P. Hinojos, CTAC ED
 G. White, CTAC ED
 CBFO QA File
 CBFO M&RC
 *ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 15-050

2. Activity No: A-15-18

3. Page 1 of 3

Block # 16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 15-050. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:15:00324 UFC:2300.00, dated October 26, 2015, from Mr. V. K. Cannon, Manager, NWP Quality Assurance, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, Carlsbad Field Office, Quality Assurance.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

CCP has taken the following remedial actions in response to the CAR condition:

1. Revised DR006 for waste stream IN-ID-BTO-030 to correctly reference AK source documents U221, U264 and added reference P132 to clarify in the narrative the actual procedure used.

Evaluation:

The remedial actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

INVESTIGATIVE ACTIONS

CCP has determined that the solidification procedure captured as source document P132 was developed by Bettis a year prior to implementing the solidification process. Bettis modified the process a year later, when the work began, and the revised procedure was captured as source document U221.

Extent

During the audit, the consensus was that this condition was isolated. To confirm this to be the case, CCP interviewed three CCP Site Project Managers (SPMs) to determine whether they were aware of any DRs that ever required a revision to change a source document reference, or to clarify the reason why a source document was referenced. None of the SPMs recalled this ever happening before. This information supports the conclusion that the CAR condition describes an isolated incident.

Impact

There is no technical impact from the CAR condition:

- a. As stated in the description of the condition in the CAR, the resolution described in the DR006, which was to follow the procedure in AK source document U221, is correct.*
- b. CBFO Memorandum CBFO:NC:MT:15-1059:UFC 5900.00 from Mr. J.R. Stroble to Mr. Michael Brown, dated August 31, 2015, Subject: Evaluation of Impact for CAR 15-050, states in part that: "The accelerated CAR condition does not impact waste already received by the Waste Isolation Pilot Plant (WIPP) or waste awaiting shipment to WIPP ... The issue corrected on the DR, the AKEs issued does not affect any data for the waste stream." The DR and associated Attachment 3 contained a reference to a source document that was not used in any way as the basis for resolving the reported discrepancy.*

Evaluation:

The investigative actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

CAR CONTINUATION SHEET

1. CAR No: 15-050	2. Activity No: A-15-18	3. Page 2 of 3
-------------------	-------------------------	----------------

ROOT CAUSE DETERMINATION

The AKE who completed DR006 and the associated Attachment 3 form is no longer associated with the program, so it was not possible to interview and ascertain his reasoning for having included P132 as a source document reference.

Due to the unavailability of the original AKE who authored the 2013 DR006 (he was formerly a LANL employee), an independent review of DR006 and the associated Attachment 3 form was conducted by a qualified AKE in the CCP organization. Based on this review, it is a reasonable conclusion that the original AKE for the 2013 DR006 recognized that both source documents (U264 and U221) had some bearing on the time-history of the solidification process at Bettis and he included both documents for completeness. Specifically, U264 was the recollection of personnel responsible for performing the work.

Although U264 (the interview of personnel) may have had some bearing on the process, it was actually U221 that was the step-by-step process that was documented at the time of the work. In addition, when the AKE summarized P132 on the Attachment 3 he did not state that P132 was an earlier version of the solidification procedure, and was eventually replaced by the U221 solidification procedure when the actual work was performed. It is clear that the original AKE recognized that the U221 procedure was the correct one, because (as noted in the CAR) the resolution described in DR006 (the resolution was to follow the procedure described in AK source document U221) was correct.

Evaluation:

The root cause determination described above is deemed appropriate to address the condition adverse to quality identified in the CAR.

ACTIONS TO PRECLUDE RECURRENCE

The condition reported in the CAR does not represent a programmatic breakdown, but SPMs and AKEs should be made aware of the CAR condition so they are alerted to the situation for the future.

1. CCP will summarize the reported condition and the way the DR should have been written, and distribute the summary to SPMs and AKEs as required reading.

COMMITMENTS

DUE DATES

CCP to revise DR006 for waste stream IN-ID-BTO-030 to correctly reference AK source documents U221, U264 and added reference P132 to clarify in the narrative the actual procedure used.

Complete

CCP to summarize the reported condition and the way DR006 should have been written, and distribute the summary to SPMs and AKEs as required reading.

November 7, 2015

Provide closure documentation to NWP Quality Assurance.

November 14, 2015

NWP QA, transmit closure documentation to the CBFO.

November 19, 2015

Evaluation:

The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

CAR CONTINUATION SHEET

1. CAR No: 15-050

2. Activity No: A-15-18

3. Page 3 of 3

ACCEPTANCE

The results of the evaluation of the CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 15-050, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 15-050 be approved.

Samara D. Ackman for
Evaluation Performed By: Dick Blauvelt, CTAC

11/02/15
Date