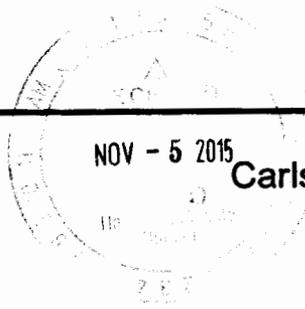


United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

ENTERED

DATE: NOV 05 2015
REPLY TO
ATTN OF: CBFO:OQA:MPN:BA:15-0948:UFC 2300.00
SUBJECT: Issuance of CARs 16-004, 16-006, 16-007, and 16-008 Identified During Audit A-16-01
TO: Mr. Benjamine Roberts, DOE-ID

The Carlsbad Field Office performed Recertification Audit A-16-01, Advanced Mixed Waste Treatment Project certification activities for contact-handled transuranic waste, October 27-29, 2015. Attached are Corrective Action Reports (CARs) 16-004, 16-006, 16-007, and 16-008 addressing the conditions adverse to quality identified during the audit.

CAR 16-008 is Resource Conservation and Recovery Act (RCRA)-related requiring accelerated corrective action. The corrective action completion is due no later than 30 calendar days from issuance of the CAR.

Please provide documented responses for the CARs, ensuring that the required actions indicated in CAR Block 12 are addressed, including schedules for completion. Please return your responses to me on or before the due date identified in CAR Block 14a.

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

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachments

151106



Mr. Benjamin Roberts

-2-

cc: w/attachments

M. Brown, CBFO	*ED
J.R. Stroble, CBFO	ED
D. Miehls, CBFO	ED
N. Castaneda, CBFO	ED
G. Birge, CBFO	ED
T. Carver, CBFO	ED
S. Ross, EM-43	ED
J. Zimmerman, DOE-ID	ED
M. Willcox, DOE-ID	ED
B. Blyth, DOE-ID	ED
D. Haar, AMWTP	ED
G. Byram, AMWTP	ED
G. Tedford, AMWTP	ED
A. Morse, AMWTP	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
H. Kirschenmann, CTAC	ED
R. Vawter, CTAC	ED
C. Castillo, 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.: 16-004	2. Activity Report No.: A-16-01	3. Page 1 of 1
4. Controlling document:	AMWTP MP-DOCS-18.2, Rev. 18, <i>Records Management</i>	5. CBFO Assessment Team Leader: Martin Navarrete
6. Responsible organization: AMWTP		7b. CAQ was discussed with: Delisa Tucson
<p>8. Requirement that is involved: MP-DOCS-18.2, <i>Records Management</i>, Sections 3.2.3 and 3.2.5 require: 3.2.3 Records Custodians complete required custodian training OAWT1089, Records Custodian Training, as requested by the Records Officer. 3.2.5 Records Officer update approve list of Records Custodians. Ensure list is available on the approved AMWTP home page and coordinate with the training organization to ensure that all appointed Records Custodians have been trained.</p>		
<p>9. Condition Adverse to Quality (CAQ): The approved list of Records Custodians that is maintained by the Records Officer contains Records Custodians who are not current on the required record custodian training OAWT1089.</p> <p>The list of Record Custodians contains approximately sixty names and nine are not current on the required training.</p>		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? 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"/>		12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: TQ-04	13b. CAR Initiator: <i>Cindi Castillo for</i> (printed name) Roger Vawter	Date: 11/3/15
14a. Response due date: <u>DEC 4, 2015</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <i>M.P. Navarrete</i> (printed name) Martin Navarrete		Date: <u>11-5-2015</u>
b. CBFO Quality Assurance Director: <i>Michael R. Brown</i> (printed name) Michael R. Brown		Date: <u>11/5/2015</u>
16. Acceptance of Proposed Corrective Actions: _____ (printed name)		Date: _____
17. Acceptance of Corrective Action Completion: _____ (printed name)		Date: _____
18. Closure: _____ (printed name)		Date: _____

INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION PLAN

WASTE ISOLATION PILOT PLANT
U.S. DEPARTMENT OF ENERGY
Carlsbad Field OfficeINSTRUCTIONS 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 # 16-004
 - 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.

CORRECTIVE ACTION REPORT

1. CAR No.: 16-006	2. Activity Report No.: A-16-01	3. Page 1 of 1
4. Controlling document: AMWTP MP-DOCS-18.4, <i>Document Control</i> , Rev. 46	5. CBFO Assessment Team Leader: Martin Navarrete	
6. Responsible organization: AMWTP		
7a. CAQ/CAR Owner (Office Director):	7b. CAQ was discussed with: Marti McKean	
8. Requirement that is involved: MP-DOCS-18.4, <i>Document Control</i> , Section 3.17.8 requires: "Controlled Copy Holder ensure training for updating and maintaining controlled copies is current." NOTE: Online course 0AWT1091, Updating Controlled Copies, is the current training.		
9. Condition Adverse to Quality (CAQ): AMWTP individuals who are Controlled Copy Holders are not current on the required training for updating and maintaining Controlled Copy documents. Thirteen AMWTP individuals are assigned Controlled Copies. Six of these individuals are not current on the required training.		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? 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"/>	12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: TQ-04	13b. CAR Initiator: <i>Cindi Castillo</i> <small>(printed name)</small> Roger Vawter	Date: 11/3/15
14a. Response due date: <u>DEC 4, 2015</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <i>M.P. Navarrete</i> <small>(printed name)</small> Martin Navarrete		Date: <u>11-5-2015</u>
b. CBFO Quality Assurance Director: <i>Michael R. Brown</i> <small>(printed name)</small> Michael R. Brown		Date: <u>11/5/2015</u>
16. Acceptance of Proposed Corrective Actions: _____ <small>(printed name)</small>		Date: _____
17. Acceptance of Corrective Action Completion: _____ <small>(printed name)</small>		Date: _____
18. Closure: _____ <small>(printed name)</small>		Date: _____

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 # **16-006**
 - 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.

CORRECTIVE ACTION REPORT

1. CAR No.: 16-007	2. Activity Report No.: A-16-01	3. Page 1 of 1
4. Controlling document: CBFO QAPD, Rev. 12		5. CBFO Assessment Team Leader: Martin Navarrete
6. Responsible organization: AMWTP		
7a. CAQ/CAR Owner (Office Director):		7b. CAQ was discussed with: Angie Morse
<p>8. Requirement that is involved: CBFO QAPD, Rev. 12, Section 1.1.2.3 A states, "The graded approach is the process by which the level of analysis, documentation, verification, and other controls necessary to comply with QA program requirements are developed commensurate with the following factors:</p> <ol style="list-style-type: none"> 1. The importance of an item or activity with respect to safety, waste isolation, security, and regulatory compliance 2. The importance of the data to be generated 3. The need to demonstrate compliance with specific regulatory design and QA requirements 4. The impact on the results of performance assessments and engineering analyses 5. The magnitude of a hazard or the consequences of failure 6. The life-cycle stage of a facility or item 7. The programmatic mission of a facility 8. The particular characteristics of a facility, item, or activity (e.g., complexity, uniqueness, history, or the necessity for special controls or processes) 9. The relative importance of radiological and non-radiological hazards" <p>9. Condition Adverse to Quality (CAQ): The graded approach factors of "the importance of the data to be generated" and "the consequence of failure" are not listed in MP-Q&SI-5.6, Graded Approach, Revision 4 when determining level of analysis, documentation, verification, and other controls necessary to comply with QA program requirements.</p> <p>10. Suggested actions (Optional): N/A</p>		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? 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"/>		12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: QA-02	13b. CAR Initiator: <u>Cindi Castillo</u> (printed name) Harley Kirschenmann	Date: 11/3/15
14a. Response due date: <u>DEC 4, 2015</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>M. P. Navarrete</u> (printed name) Martin Navarrete		Date: <u>11-5-15</u>
b. CBFO Quality Assurance Director: <u>Michael R. Brown</u> (printed name) Michael R. Brown		Date: <u>11/5/15</u>
16. Acceptance of Proposed Corrective Actions: _____ (printed name)		Date: _____
17. Acceptance of Corrective Action Completion: _____ (printed name)		Date: _____
18. Closure: _____ (printed name)		Date: _____

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**

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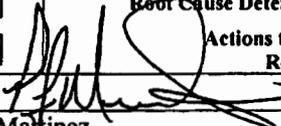
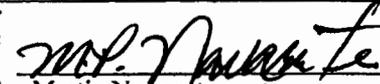
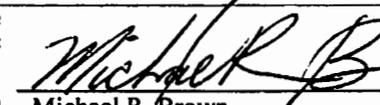
The corrective action plan shall address the corrective actions indicated in CAR block 12. As appropriate, develop the plan in accordance with the following sequence and format:

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 # 16-007
 - 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.
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CORRECTIVE ACTION REPORT

1. CAR No.: 16-008	2. Activity Report No.: A-16-01	3. Page 1 of 1
4. Controlling document:	INST-OI-12, <i>Real-Time Radiography Examinations (Certification Scans)</i> , Rev.57	5. CBFO Assessment Team Leader: Martin Navarrete
6. Responsible organization: AMWTP		
7a. CAQ/CAR Owner (Office Director):	7b. CAQ was discussed with:	Dave Haar, Steve Tallman, Mark Sorensen
8. Requirement that is involved: INST-OI-12, <i>Real-Time Radiography Examinations (Certification Scans)</i> , Rev. 57, Section 4.6.36.1 states, "If a container has impenetrable objects that prevent full examination, THEN initiate NCR in accordance with MP-Q&SI-5.4".		
9. Condition Adverse to Quality (CAQ): No NCRs are being generated for containers with impenetrable objects. RTR operators are answering the question for the presence of Impenetrable Dense Objects as "no" when in fact the waste cannot be penetrated. There are several IDCs (approx. 23) with containers of bulk loaded sludges that have enough AK information to satisfy WAP requirement in section C1-1 that states "Containers whose contents prevent full examination of the remaining contents shall be subject to visual examination unless the site certifies that visual examination would provide no additional relevant information for that container based on the acceptable knowledge information for the waste stream". For this reason, RTR operators have been instructed to enter 'no' for the presence of impenetrable dense objects for containers with impenetrable waste from the applicable waste streams.		
10. Suggested actions (Optional):		
11a. Significant CAQ? (If 'Yes', go to block 15b)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11b. Work Suspension recommended? (If 'Yes', go to block 15b)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
11c. RCRA related?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
11d. Accelerated corrective action required? (If 'Yes', go to block 15b)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
11e. Does this CAQ affect waste streams BNINW216 or BNINW218?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
13a. Trend Code: VE-06	13b. CAR Initiator:  (printed name) P. Martinez	Date: 11/3/15
14a. Response due date: <u>Nov. 24, 15</u>		
14b. Required corrective action completion date: <u>DEC 4, 2015</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable):	 (printed name) Martin Navarrete	Date: 11-5-15
b. CBFO Quality Assurance Director:	 (printed name) Michael R. Brown	Date: 11/5/15
16. Acceptance of Proposed Corrective Actions: _____ Date: _____ (printed name)		
17. Acceptance of Corrective Action Completion: _____ Date: _____ (printed name)		
18. Closure: _____ Date: _____ (printed name)		

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**

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1. Corrective action response for CAR # 16-008
 - 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.
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