



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
NOV 13 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 15-050 from Audit A-15-18, Idaho National Laboratory Central Characterization Program

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) 15-050. The results of the verification are documented on the enclosed CAR Continuation Sheets, 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



Mr. Val Cannon

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cc: w/enclosure

M. Brown, CBFO	*ED
M. Navarrete, CBFO	ED
J.R. Stroble, CBFO	ED
G. Birge, CBFO	ED
N. Castaneda, CBFO	ED
J. Zimmerman, DOE-ID	ED
M. Wilcox, DOE-ID	ED
B. Roberts, DOE-ID	ED
A. Bergman, DOE-ID	ED
P. Breidenbach, NWP	ED
J. Blankenhorn, NWP	ED
J. Britain, NWP	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
B. Allen, NWP/QA	ED
S. Punchios, NWP/QA	ED
T. Peake, EPA	ED
L. Bender, EPA	ED
E. Feltcom, EPA	ED
R. Joglekar, EPA	ED
J. Kieling, NMED	ED
S. Holmes, NMED	ED
R. Maestas, 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
D. Harvill, CTAC	ED
G. White, CTAC	ED
Site Documents	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

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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) 15-050, including objective evidence and supporting documentation submitted via Nuclear Waste Partnership LLC (NWP) letter QA:15:00342 UFC:2300.00, from V. K. Cannon to Dennis S. Miehl on November 3, 2015.

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

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.

Verification:

Remedial actions were reviewed and agreed upon in the CAP acceptance memorandum CBFO:OQA:DSM:BA:15-0947:UFC 2300.00.

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.*

Verification:

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:DSM:BA:15-0947:UFC 2300.00.

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

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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.

Verification:

Root Cause Determination was evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:DSM:BA:15-0947:UFC 2300.00.

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.

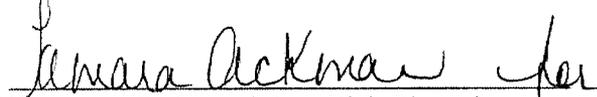
November 19, 2015

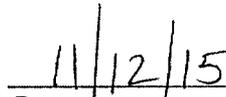
Verification:

Discrepancy Resolution DR006 has been revised to clarify the actual procedure used to solidify the waste in this waste stream as described in AK Source Document U221, to provide the corrected AK Source document references and to add AK Source Document P132 to complete the list of referenced AK information. In addition, a required reading training memo has been issued to all AKEs and SPMs to summarize the reported condition, noting how the DR should have been written.

CLOSURE ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 15-050 closure package, it is recommended that CAR 15-050 be closed.


Evaluation Performed By: Dick Blauvelt


Date