



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
NOV 16 2015



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

Subject: Evaluation of the CAP for CBFO CAR 15-063 Resulting from CBFO Audit A-15-21

Dear Mr. Cannon:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 15-063. As documented on the enclosed CAR Continuation Sheets, 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	A. Boyea, NWP	ED
J.R. Stroble, CBFO	ED	T. Peake, EPA	ED
M. Navarrete, CBFO	ED	L. Bender, EPA	ED
H. Cruickshank, CBFO	ED	E. Feltcorn, EPA	ED
N. Castaneda, CBFO	ED	R. Joglekar, EPA	ED
T. Carver, CBFO	ED	J. Kielling, NMED	ED
D. Hintze, LAFO	ED	R. Maestas, NMED	ED
D. Nickless, LAFO	ED	S. Holmes, NMED	ED
M. Papp, LANL	ED	C. Smith, NMED	ED
P. Breidenbach, NWP	ED	V. Daub, CTAC	ED
J. Blankenhorn, NWP	ED	R. Allen, CTAC	ED
J. Britain, NWP	ED	P. Martinez, CTAC	ED
F. Sharif, NWP	ED	B. Pace, CTAC	ED
D. E. Gulbransen, NWP	ED	T. Ackman, CTAC	ED
R. Reeves, NWP	ED	D. Blauvelt, CTAC	ED
A.J. Fisher, NWP	ED	P. Hinojos, CTAC	ED
C. Simmons, NWP	ED	G. White, CTAC	ED
I. Joo, NWP	ED	Site Documents	ED
J. Carter, NWP	ED	CBFO QA File	
B. Allen, NWP	ED	CBFO M&RC	
S. Punchios, NWP	ED	*ED denotes electronic distribution	

151117



CAR CONTINUATION SHEET

1. CAR No: 15-063

2. Activity No: A-15-21

3. Page 1 of 2

Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 15-063. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:15:00319 UFC:2300.00, dated October 22, 2015, from Mr. V. K. Cannon, Manager, NWP Quality Assurance, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, CBFO 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

As discussed in the Impact section of this Corrective Action Plan, there is no technical impact from the reported condition. The information was not required to be included in the AK Summary Report. CCP-AK-LANL-006 is one of the documents scheduled to be rewritten to reduce the number of waste streams covered by individual AK reports. There is no expectation that CCP-AK-LANL-006 will ever be revised in its present form; it will instead be split into more than one AK report, by waste stream.

CCP will take the following remedial action in response to the CAR condition:

CCP will issue a Standing Order specific to the NDA value in CCP-AK-LANL-006, explaining that it is not used by anyone and does not need to be in the report. The information is over and above that required by CCP-TP-005 and its presence has no impact on characterization, certification, or shipment of waste.

Evaluation:

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

INVESTIGATIVE ACTIONS

The investigation by CCP showed that the CAR condition was the result of the following set of circumstances:

- In 2012, certified CCP NDA data reported an upper value for U-232 that did not match the information reported in the radiological table for waste stream LA-MHD01.001. In accordance with CCP requirements, NCR-LANL-1023-12 was issued, resulting in the generation of Discrepancy Resolution (DR) 048 and an AK re-evaluation. The resolution in DR048 was to update CCP-AK-LANL-006, Revision 11, to show the value reported by certified CCP NDA data. CCP-AK-LANL-006, Revision 12, properly incorporated the resolution as directed in DR048.*
- When Revision 13 of CCP-AK-LANL-006 was developed, the AKE did not make use of the values in any of the previous revisions of the AK. Rather, the AKE recalculated all the values in Table 6 using generator-reported data. The reason that U-232 reverted back to the values reported in Revision 11 is not because it, or any other previous revision of the AK was used as the starting point, but because the AKE overlooked DR048 when recalculating the values in Table 6. DR048 addressed the use of certified CCP data, not generator-reported data, for U-232.*
- There are very few containers with actual reported values of U-232, about 35 compared with 13,532 with reported Pu-239 values. For virtually all containers in the waste stream, generator-reported data is all that is available for U-232, and the AKE simply overlooked DR048 when doing the recalculations for Table 6 in Revision 13 of CCP-AK-LANL-006.*

Extent

The AK Inventory and Support Manager discussed the CAR condition with AK personnel to determine if there have been other situations like the one reported in the CAR. There have been cases where typographical errors and inconsistencies have been identified in AK Summary Reports, but not this specific condition. The consensus within the AK organization is that this condition is isolated, an inadvertent omission made by the AKE.

CAR CONTINUATION SHEET

1. CAR No: 15-063

2. Activity No: A-15-21

3. Page 2 of 2

Impact

There is no technical impact from the CAR condition: Only the 10 WIPP radionuclides, the two predominant radionuclides by mass, and the radionuclides that contribute to 95 percent of the radioactive hazard for a payload container are required to be identified and documented. Since U-232 does not fall into any of these categories it does not need to be included in the AK report or otherwise.

Evaluation:

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

ROOT CAUSE DETERMINATION

Not requested.

ACTIONS TO PRECLUDE RECURRENCE

The condition reported in the CAR does not represent a programmatic breakdown, but 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 distribute the summary to AKEs as required reading. The summary will include a reminder that AKEs should not include unnecessary (non-required) information in AK Summary Reports.*

COMMITMENTS

CCP to issue a Standing Order specific to the NDA value in CCP-AK-LANL-006, explaining that it is not used by anyone and does not need to be in the report. The information is over and above that required by CCP-TP-005 and its presence has no impact on characterization, certification, or shipment of waste.

DUE DATES

October 30, 2015

CCP to summarize the reported condition and distribute the summary to AKEs as required reading, including a reminder that AK Summary Reports should not contain unnecessary (non-required) information.

October 30, 2015

Provide closure documentation to NWP Quality Assurance.

December 7, 2015

NWP QA, transmit closure documentation to the CBFO.

December 14, 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.

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 15-063, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 15-063 be approved.


 Evaluation Performed By: Richard Blauvelt, CTAC


 Date