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

DEC 4 2015

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

Subject: Acceptance of the CAP for CAR 15-062 *Lack of Approval for Rad Characterization Tech Report*

Dear Mr. Cannon:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the proposed Corrective Action Plan (CAP) associated with Corrective Action Report (CAR) 15-062, which resulted from Audit A-15-25, Sandia National Laboratories Central Characterization Program. The results of the review indicate that the CAP is acceptable, as documented on the enclosed CAR Continuation Sheets.

Please proceed with the corrective actions described in the CAP and provide notification and documentation supporting closure upon completion of all corrective actions so that verification activities may be performed.

If you have any questions or comments concerning the evaluation, please contact me at (575) 234-7491.

Sincerely,

D. S. Miehls

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure

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CBFO:OQA:DSM:BA:15-0983:UFC 2300.00

cc: w/enclosure

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CAR CONTINUATION SHEET

1. CAR No: 15-062	2. Activity No: A-15-25	3. Page 1 of 3

Block # 16 Acceptance/Rejection 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) 15-062. The CAP was submitted via Nuclear Waste Partnership (NWP) letter QA:15:00361 UFC:2300.00 (CBFO Unique # 1502812), dated November 17, 2015, from Mr. V. K. Cannon, Manager, Quality Assurance, to Mr. D. S. Miehls, Senior Quality Assurance Specialist, 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

At the time of the audit, CCP-AK-SNL-501, Central Characterization Program Remote-Handled Transuranic Radiological Characterization Technical Report For Sandia National Laboratory/New Mexico Hot Cell Facility Remote-Handled Transuranic Debris Waste, Waste Stream: SNL-HCF-S5400-RH, was already in revision to incorporate updated information for the waste stream. CCP-AK-SNL-501 has been revised and issued, and includes the drums in Batch Data Report (BDR) SNLRHDTC15001.

Evaluation

The proposed remedial action adequately addresses the conditions adverse to quality identified in the CAR.

INVESTIGATIVE ACTIONS

In order to produce an RCTR, calculation packages for the waste stream first have to be developed and approved. The RCTR contains the summary of the radiological characterization approach for the waste stream, along with calculation package screen shot examples. Each original RCTR and each revision to an RCTR must be approved internally by CCP and then by CBFO. When an RCTR is first developed and approved, it includes all containers that have been characterized to that point. Each time an RCTR is revised, the updated (and CBFO-approved) revision includes the most recent set of containers characterized since the previous revision. In between RCTR revisions, characterization of containers not yet on the RCTR continues, but these containers will be added at the time of the next revision of the RCTR.

During the investigation, CCP determined the need to define how the implementation requirement cited in the Requirement That is Involved section of the CAR is complied with, for RCTRs and their revisions: i.e., the implementation method that is described in the preceding paragraph of this Corrective Action Plan. In order to capture this implementation method, and to improve the formality of control for RCTRs, CCP will issue a procedure governing this scope of work.

Extent

The CAR condition is typical for those waste streams with multiple calculation package screen shots/scaling factors.

Impact

For the specific RCTR cited in the CAR:

RCTR CCP-AK-SNL-501 does not provide any information necessary to implement the calculations used to generate BDR SNLRHDTC15001. The calculations are governed by procedure CCP-QP-037, CCP Calculations. The calculation packages were approved prior to use and are referenced in the RCTR.

In the general case:

The information necessary to develop scaling factors for radiological characterization of RH TRU waste is contained in calculation packages developed in accordance with CCP-QP-037. The purpose of the RCTR is to provide CBFO with a summary of the scaling factors for each container in the waste stream, along with references to the calculation packages that support these factors. By definition, RCTRs cannot be developed until after the calculation packages and scaling factors are in place.

Preparation of RCTRs and their revisions, along with approval by CBFO, occurs throughout the characterization life cycle of RH waste streams. When an RCTR is first prepared, and each time one is revised, it is reconciled with the number of containers characterized to that point.

All BDRs, calculation packages, and other supporting documentation required for certification and shipment of RH waste have to be approved before the waste can be certified and shipped to WIPP. The CCP RH program contains controls to ensure that all approvals are in place before RH waste is certified and available for shipment.

For all of the above reasons, there is no technical impact from the CAR condition.

Evaluation

The investigative actions are determined to adequately address the conditions adverse to quality identified in the CAR.

ROOT CAUSE

A root cause analysis was not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

CCP will develop a new procedure to address the purpose of the Radiological Characterization Technical Report (RCTR) and describe the document flow of implementation throughout the characterization life cycle of RH waste streams.

Evaluation

The proposed actions to preclude recurrence, as stated in the CAP, are determined to adequately address the scope of the deficiency identified in the CAR.

SCHEDULE FOR COMPLETION OF CORRECTIVE ACTIONS

	COMMITMENTS	***DUE DATES***
1.	*CCP to obtain CBFO approval of the update to CCP-AK-SNL-501, and issue the revision.*	*Complete*
2.	*CCP to capture the implementation method for RCTRs and improve the formality of control for RCTRs by issuing a procedure governing this scope of work.*	*01/18/2016*
3.	*Provide closure documentation to NWP Quality Assurance.*	*01/22/2016*
4.	*NWP QA, transmit closure documentation to the CBFO.*	*01/27/2016*

Evaluation

The proposed schedule for completion of corrective actions is deemed to be acceptable. The expected completion date for all corrective actions is January 27, 2016.

ACCEPTANCE

Evaluation of the CAP indicates that the proposed corrective actions satisfactorily address the CAQ identified in CAR 15-062, proposed investigative actions are adequate to address the scope of the condition, and adequate measures are proposed to preclude recurrence. Therefore, it is recommended that the CAP for CAR 15-062 be approved.

The following items will be evaluated to verify completion of corrective actions, with supporting documentation provided in the CAR closure package:

1) Review and approval of the procedure describing the purpose and document flow involved in the development and approval of the RCTR and supporting documents throughout the characterization life cycle of RH waste streams.

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CAR CONTINUATION SHEET

1. CAR No: 15-062	2. Activity No: A-15-25	3. Page 3 of 3

2) Evaluate evidence of the implementation of the newly developed procedure with particular attention to the rolls and responsibilities and any sequencing steps that ensure that waste characterization activities will not be presented for certification without all of the required documentation being complete and approved as required.

3) Examine the distribution and any necessary reading or training to ensure that the requirements of the newly developed procedure are understood and implemented by all cognizant individuals doing work governed by the procedure.

Other items related to completion of corrective actions included in the CAP may be evaluated as necessary.

P/f for

Evaluation Performed By: James R Oliver

12/4/15
Date