



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
DEC 07 2015



**ENTERED**



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 15-063  
*Discrepancy Resolution at AK* Resulting from Recertification  
Audit A-15-21, Los Alamos National Laboratory Central Characterization  
Program, Conducted September 1-3, 2015

Dear Mr. Cannon:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 15-063, which resulted from Audit A-15-21. 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

S. Ross, EM-43	*ED
M. Brown, CBFO	ED
J.R. Stroble, CBFO	ED
M. Navarrete, CBFO	ED
N. Castaneda, CBFO	ED
H. Cruickshank	ED
D. Hintze, LAFO	ED
M.L. Bishop, LAFO	ED
M. Papp, LANL	ED
P. Breidenbach, NWP	ED
J. Blankenhorn, NWP	ED
J. Britain, NWP	ED
F. Sharif, NWP	ED
D. E. Gulbransen, NWP	ED
R. Reeves, NWP	ED
A.J. Fisher, NWP	ED
I. Joo, NWP	ED
J. Carter, NWP	ED
C. Simmons, NWP	ED
B. Allen, NWP	ED
S. Punchios, NWP	ED
A. Boyea, 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
P. Martinez, CTAC	ED
B. Pace, CTAC	ED
D. Blauvelt, CTAC	ED
P. Hinojos, 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: 15-063

2. Activity No: A-15-21

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**Block #17 & 18 Acceptance of Proposed Corrective Actions:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 15-063, including objective evidence and supporting documentation submitted via Nuclear Waste Partnership LLC (NWP) letter QA:15:00363 UFC:2300.00, from V. K. Cannon to D. S. Miehl, Subject: "TRANSMITTAL OF THE DOCUMENTATION SUPPORTING COMPLETION OF THE CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 15-063, WHICH RESULTED FROM CBFO AUDIT A-15-21, LOS ALAMOS NATIONAL LABORATORY CENTRAL CHARACTERIZATION PROGRAM."

Italicized text, taken verbatim from the Corrective Action Plan (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.*

**Verification:**

Verified through review of the Standing Order CCP-SO-LANL-69, Rev. 0. The standing order contains relevant information to support completion of corrective actions for Remedial Actions.

**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*

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1. CAR No: 15-063

2. Activity No: A-15-21

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*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.*

**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.*

**Verification:**

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:DSM:BA:15-0963:UFC 2300.00.

**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.*

- 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.*

*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.*

*Provide closure documentation to NWP Quality Assurance.*

*NWP QA, transmit closure documentation to the CBFO.*

**DUE DATES**

*October 30, 2015*

*October 30, 2015*

*December 7, 2015*

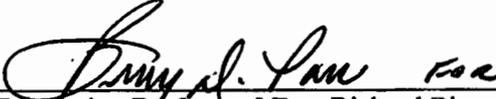
*December 14, 2015*

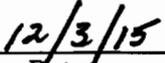
**Verification:**

Verified actions to preclude recurrence through review of supporting documentation submitted in the CAR 15-063 closure package. The reviewed documentation included the email notifying all Acceptable Knowledge Experts (AKEs) of the required reading, the required reading for CAR 15-063, and the dated acknowledgement of review of the required reading from all AKEs.

**CLOSURE ACCEPTANCE**

Based on the results of the review of the objective evidence included in the CAR 15-063 closure package, it is recommended that CAR 15-063 be closed.

  
Evaluation Performed By: Richard Blauvelt, CTAC

  
Date