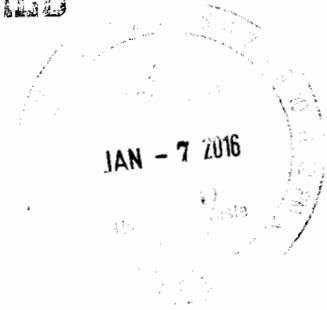




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JAN 07 2016



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 16-001 from CBFO Audit A-15-24, Argonne 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) 16-001. 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) 234-7483.

Sincerely,

Martin P. Navarrete (handwritten signature)

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

- M. Brown, CBFO * ED
D. Miehl, CBFO ED
J.R. Stroble, CBFO ED
G. Birge, CBFO ED
N. Castaneda, CBFO ED
T. Carver, CBFO ED
S. Ross, EM-43 ED
R. Purucker, DOE-CH ED
D. Dietzel, DOE-CH ED
K. Joshi, DOE-CH 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
B. Allen, NWP ED
S. Punchios, NWP ED
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T. Peake, EPA ED
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J. Kieling, NMED ED
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V. Daub, CTAC ED
R. Allen, CTAC ED
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B. Pace, CTAC ED
P.Y. Martinez, CTAC ED
K. Martin, 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: 16-001

2. Activity No: A-15-24

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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) 16-001, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) letter QA:16:00005 UFC:2300.00, dated January 6, 2016, from Mr. V. K. Cannon, Manager, NWP Quality Assurance, to Mr. M. P. Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance.

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

The following remedial action has been taken to address the reported condition:

CCP issued NCR-RHANL-0215-15 to obtain a technical disposition for the VE data sheets that were processed outside of procedural instruction.

Verification:

Remedial actions were reviewed and agreed upon in the CAP acceptance memorandum CBFO:OQA:MPN:BA:15-2609:UFC 2300.00.

INVESTIGATIVE ACTIONS

The CCP investigation showed that, shortly after Visual Examination (VE) of the two containers, they were opened at the request of the Host site so that Host site personnel could retrieve high dose material. The containers were emptied of waste and the two VE Operators performed VE as the waste (minus the high dose material) was placed back into the containers. As noted in the CAR, the results were documented on the Attachment 1 VE data sheets that were created during the first VE, by lining through the items that were not placed inside, lining through the original signatures, and re-signing the VE data sheets.

The same two VE Operators who performed the initial VE were the ones who performed the second VE.

During the investigation, the CCP manager at ANL stated that because the containers were still in the Hot Cell and had not been loaded into 30-gallon containers, he was thinking of the second VE as a continuation of the first. He therefore allowed the VE Operators to re-use the original Attachment 1 VE data sheets as described in the CAR, even though they were already complete and signed off.

The manager was also influenced by the fact that the procedure allows an interrupted VE activity to be resumed using the same (partially-completed) VE data sheet; thinking of the second VE as a continuation of the first reinforced his conclusion that updating the original VE data sheets was an acceptable course of action.

Original characterization records may be corrected by standard methods (pen-and-ink change, initial and date) while they are in-process at Data Generation Level. However, once the records are complete and validated, re-performance of the activity is to be documented on new record forms.

The ANL CCP manager now recognizes that the correct course of action was to prepare new VE data sheets for the second VE activity, and not to reuse the originals. As stated in the Action to Prevent Recurrence section of this Corrective Action Plan, CCP has issued Standing Order CCP-SO-117 for CCP-TP-500 stating that each time VE is performed; the results are to be documented on a new VE data sheet.

Application and Removal of Tamper Seals

A review of Operational Logbook RH-ANLE-VE-016 showed that tamper seals were applied to each container as soon as lids were installed, right after completion of the original VE. The tamper seals remained in place until just before the containers were opened to retrieve high dose material. As soon as the second VE was completed, lids were

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installed and new tamper seals were applied. During the time between the first and second VE of the containers, they remained in the Hot Cell. The containers and their contents were controlled to ensure against the unauthorized addition or removal of waste materials.

Extent

Six (6) RH drums at ANL are affected by the CAR condition. All six drums are included in NCR-RHANL-0215-15. The table below summarizes the extent of condition information, listing the eight indirect load containers inside the six drums (including the two containers cited in the CAR).

| <i>VE Batch Data Report</i> | <i>Final Output (Drum) Container Number</i> | <i>Indirect Load Container Number(s)</i> | <i>Date VE Performed</i> |
|-----------------------------|-------------------------------------------------|----------------------------------------------|------------------------------|
| <i>ANLRHVE13002</i> | <i>1172</i> | <i>990 (shield pot 7233)</i> | <i>12/06/12</i> |
| <i>ANLRHVE13015</i> | <i>1262</i> | <i>1101</i> | <i>09/14/13</i> |
| <i>ANLRHVE14004</i> | <i>1303</i> | <i>1348</i> | <i>08/15/14</i> |
| <i>ANLRHVE14004</i> | <i>1309</i> | <i>1379 1375</i> | <i>08/15/14 08/15/14</i> |
| <i>ANLRHVE14004</i> | <i>1310</i> | <i>1366 1369</i> | <i>08/15/14 08/15/14</i> |
| <i>ANLRHVE15001</i> | <i>1312</i> | <i>1356</i> | <i>09/08/14</i> |

No other CCP locations (CH or RH) are re-using completed VE data sheets: the CAR condition is limited to ANL.

Impact

There was no technical impact from the CAR condition. Everything the VE Operators did was within the scope of their training and qualification. They properly performed VE on the containers and observed every item as it was placed inside. The only issue was that, instead of filling out new VE data sheets, they used the original VE data sheets, lining out the items that were not placed inside. If they had filled out new VE data sheets, the information would have been exactly as it appears in the actual VE data sheets-except that the lined out items would not appear at all.

In addition, NCR-RHANL-0215-15 has been dispositioned use as-is for the actual VE data sheets for the affected containers.

Verification:

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MPN:BA:15-2609:UFC 2300.00.

ROOT CAUSE DETERMINATION

Not requested.

CAR CONTINUATION SHEET

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ACTIONS TO PRECLUDE RECURRENCE

1. *CCP has issued Standing Order CCP-SO-117 for CCP-TP-500 stating that each time that VE is performed, the results are to be documented on a new VE data sheet.*

COMMITMENTS

DUE DATES

CCP to issue NCR-RHANL-0215-15 to obtain a technical disposition for the VE data sheets that were processed outside of procedural instructions.

Complete

CCP to issue a Standing Order CCP-SO-117 for CCP-TP-500 stating that each time VE is performed, the results are to be documented on a new VE data sheet.

Complete

Provide closure documentation to NWP Quality Assurance.

December 14, 2015

NWP QA, transmit closure documentation to the CBFO.

December 21, 2015

Verification:

A nonconformance report was prepared and verified for description, final disposition, and closure. Standing Order CCP-SO-117 was issued, applying to performance of visual examination (VE) of remote-handled waste in accordance with CCP-TP-500, *Remote-Handled Waste Visual Examination*, Rev. 15, to address the condition documented in the CAR and to provide reasonable assurance of precluding the likelihood of recurrence. Also, a table documenting the acknowledgements of VE Operators' review of CCP-SO-117 was verified.

CLOSURE ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 16-001 closure package, it is recommended that CAR 16-001 be closed.

Priscilla Y. Martinez
 Evaluation Performed By: Priscilla Y. Martinez, CTAC

1-7-16
 Date