



ENTRUSTED

Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
JAN 26 2016

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Mr. Philip Breidenbach  
President and Project Manager  
Nuclear Waste Partnership LLC  
P.O. Box 2078  
Carlsbad, NM 88221-2078

Subject: Verification and Acceptance of Corrective Actions for CAR 14-043 D001  
*Coded Waste is Not Acceptable at WIPP in Accordance with HWFP*  
Resulting from the February 2014 Radiation Event

Dear Mr. Breidenbach:

The Carlsbad Field Office (CBFO) has conducted a review of the documentation provided (QA:15:0037) to demonstrate completion of the remedial actions associated with CBFO Corrective Action Report (CAR) 14-043. The results of the review are documented on the enclosed CAR Continuation Sheets, and indicate that the documentation of completion of remedial actions is acceptable.

As stated in the approved Corrective Action Plan, further actions, including actions to prevent recurrence, have been developed in response to the Accident Investigation Board Judgments of Need. Corrective actions for Judgments of Need have been developed, documented, approved, and are being tracked in accordance with CBFO MP 3.7 *Management of Corrective Actions Responsive to Judgment of Need Identified by the Accident Investigation Boards*. Therefore, to prevent duplicate tracking, CAR 14-043 is considered closed.

If you have any questions or comments regarding the CAR closure, please contact me at (575) 234-7476.

Sincerely,

Michael R. Brown, Director  
Office of Quality Assurance

Enclosure



Mr. Philip Breidenbach

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cc: w/enclosure

T. Shrader, CBFO	* ED
D.C. Gadbury, CBFO	ED
K. Watson, CBFO	ED
M. Brown, CBFO	ED
J.R. Stroble, CBFO	ED
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M. Navarrete, CBFO	ED
W. Mouser, CBFO	ED
E. Garza, CBFO	ED
J. Blankenhorn, NWP	ED
F. Sharif, NWP	ED
J. Britain, NWP	ED
M. Love, NWP	ED
V. Cannon, NWP	ED
B. Allen, NWP	ED
S. Punchios, NWP	ED
A. Boyea, NWP	ED
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T. Peake, EPA	ED
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J. Kieling, NMED	ED
R. Maestas, NMED	ED
C. Smith, NMED	ED
V. Daub, CTAC	ED
R. Allen, CTAC	ED
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B. Pace, CTAC	ED
R. Blauvelt, CTAC	ED
J. Stewart, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

**CAR CONTINUATION SHEET**

1. CAR No: 14-043

2. Activity No: N/A

3. Page 1 of 2

**Block #17 Acceptance of Corrective Action Completion:**

A verification of completion of corrective actions was performed based on the corrective action closure documentation submitted to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 14-043. The closure package was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:15:00377 UFC:2300.00, dated November 30, 2015, from Mr. V. K. Cannon, Manager, NWP Quality Assurance, to Mr. M. P. Navarrete, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

Italicized text, taken verbatim from the Corrective Action Plan (CAP) or closure documentation, is used to reflect the correlation between the actions required by the approved CAP and the verification of completed actions.

**REMEDIAL ACTIONS**

*NWP has taken the following remedial actions in response to the CAR condition:*

***Actions taken at the WIPP surface facilities:***

1. *Suspended shipments of TRU waste to WIPP.*
2. *Suspended underground emplacements of TRU waste containers on the surface at the WIPP site.*
3. *Determined no nitrate salt containers were part of the population of containers stored on the surface at WIPP.*

***Actions taken at the waste generator site:***

4. *Suspend shipments from LANL to WCS.*

***Actions taken at the subcontracted waste storage site:***

5. *Notified WCS of the issue with nitrate salt waste and the proposed immediate actions to stop shipments from LANL*
6. *Identified waste packages that contain nitrate salts stored at WCS.*

***Other Actions***

7. *Completed interim closure of Panel 6.*
8. *Initiated closure of Panel 7 Room 7 with a current schedule for completion in June 2015*
9. *Suspended characterization of containers processed at the LANL WCCRF.*
10. *Assigned the RCRA D001 HWN and the DOT subsidiary Hazard Division 5.1 to 624 containers (425 at WIPP, 110 at WCS, and 89 at LANL) associated with 49 separate shipping manifests.*
11. *Changed the status of LANL S3000 waste streams in WDS from "approved" to "expired" to ensure containers from these waste streams could not be shipped.*

**Verification:**

The remedial actions taken, as described above, were deemed appropriate during CAP evaluation and appear to have been completed as stated. DOE news postings, WIPP Update messages, and WDS printouts showing S3000 waste streams as expired, have been added to the CAR file as objective evidence of completed remedial actions.

**INVESTIGATIVE ACTIONS AND ROOT CAUSE DETERMINATION****Verification:**

Investigative actions and the root cause determination were deemed appropriate during CAP evaluation. No verification necessary.

**ACTIONS TO PRECLUDE RECURRENCE**

*The actions to prevent recurrence are driven by the DOE AIB Phase 2 Report, issued in April 2015.*

1. *NWP is developing a CAP for the JONs assignable to NWP for the radiological release event.*

### CAR CONTINUATION SHEET

1. CAR No: 14-043

2. Activity No: N/A

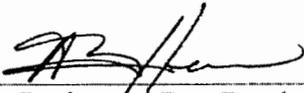
3. Page 2 of 2

Verification:

Actions to preclude recurrence are being tracked in accordance with CBFO MP 3.7, *Management of Corrective Actions Responsive to Judgements of Need Identified by the Accident Investigation Boards*. Verification of actions associated with the Judgments of Need (JONs) will be conducted separately.

**ACCEPTANCE**

Based on the information provided, it is recommended that CAR 14-043 be closed. Further tracking of the JONs referenced in CAR 14-043 will be tracked and closed in accordance with CBFO MP 3.7.



Verification Performed By: Randall Allen, CTAC

12/10/15  
Date: