



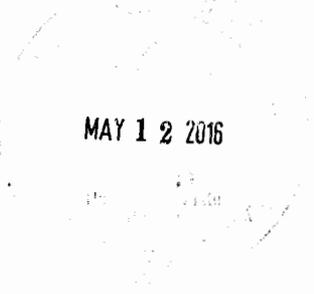
United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: MAY 12 2016
REPLY TO
ATTN OF: CBFO:OQA:MPN:BA:16-1374:UFC 2300.00
SUBJECT: Closure of CBFO CAR 16-007
TO: Mr. Benjamine Roberts, DOE-ID



The Carlsbad Field Office (CBFO) has performed an evaluation and verification of the completion of corrective actions provided by the Idaho Treatment Group in response to CBFO Corrective Action Report (CAR) 16-007. The evaluation results are provided in the attached CAR Continuation Sheet.

The results of the verification conclude that the reported corrective actions are acceptable; therefore CAR 16-007 is closed. No additional actions are required.

If you have any questions concerning this CAR closure, please contact me at (575) 234-7483.

Martin P. Navarrete

Senior Quality Assurance Specialist

Attachment

cc: w/attachment

- S. Ross, EM-43 *ED
- M. Brown, CBFO ED
- J.R. Stroble, CBFO ED
- D. Miehl, CBFO ED
- N. Castaneda, CBFO ED
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- CBFO QA File
- CBFO M&RC

*ED denotes electronic distribution

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CAR CONTINUATION SHEET

1. CAR No: 16-007

2. Activity No: A-16-01

3. Page 1 of 2

Requirement Involved:

CBFO QAPD, Rev. 12, section 1.1.2.3 A states: *"The graded approach is the process by which the level of analysis, documentation, verification, and other controls necessary to comply with QA program requirements are developed commensurate with the following factors:*

- 1. The importance of an item or activity with respect to safety, waste isolation, security and regulatory compliance*
- 2. The importance of the data to be generated*
- 3. The need to demonstrate compliance with specific regulatory design and QA requirements*
- 4. The impact on the results of performance assessments and engineering analyses*
- 5. The magnitude of a hazard or the consequence of failure*
- 6. The life-cycle stage of a facility or item*
- 7. The programmatic mission of a facility*
- 8. The particular characteristics of a facility, item, or activity (e.g., complexity, uniqueness, history, or the necessity for special controls or processes)*
- 9. The relative importance of radiological and non-radiological hazards"*

Condition Adverse to Quality:

The graded approach factors of "the importance of the data to be generated" and "the consequence of failure" are not listed in MP-Q&SI-5.6, *Graded Approach*, Rev. 4, when determining level of analysis, documentation, verification, and other controls necessary to comply with QA program requirements.

Remedial Actions: Due Date: 02-29-2016*

MP-Q&SI-5.6, *Graded Approach*, was under revision at time of audit. DCR 21162 will be revised to include "the importance of the data to be generated" and "the consequence of failure" in MP-Q&SI-5.6.

*This document is on AMWTP's WIPP Procedure List and will require review/concurrence by DOE-ID and then formal review/approval by CBFO prior to closure of this CAR.

Evaluation:

The changes to the current procedure AMWTP MP-Q&SI-5.6 were provided and deemed acceptable. MP-Q&SI, Rev. 5, section 3.2 includes "Importance of data being generated" and "The magnitude of a hazard or the consequence of failure," when grading items and activities. MP-Q&SI-5.6, Rev. 5B, *Graded Approach*, was formally approved by the CBFO Office of Quality Assurance prior to closure of this CAR.

Investigative Actions:

In March 2006, MP-Q&SI-5.6 was reviewed by CBFO. CBFO procedure comment stated: "Does not show the requirements for importance of the data to be generated..." Response provided to CBFO stated "Definition of Class II equipment aligns with the process analysis flowchart in Appendix A which identifies WIPP requirements as a key factor to be evaluated." MP-Q&SI-5.6 was subsequently approved by CBFO in March 2006.

To ensure compliance, CBFO Quality Assurance Program Document (QAPD), Rev. 12, was evaluated to determine if similar information associated with graded approach was not addressed in MP-Q&SI-5.6, *Graded Approach*. It was determined that no additional changes were required.

CAR CONTINUATION SHEET

1. CAR No: 16-007	2. Activity No: A-16-01	3. Page 2 of 2
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Evaluation:

MP-Q&SI-5.6, Rev. 4, along with the CBFO Document Review Record for MP-Q&SI-5.6, Rev. 2A, *Graded Approach*, dated 3-23-2006 were reviewed. The flowchart in Appendix A of Q&SI-5.6 identifies the consideration of importance to safety and consequences of failure when qualifying Class 2 equipment. Class 2 equipment is defined in MP-Q&SI-5.6 as equipment controlled or designated by the DSA as "other items important to safety." CBFO approved the AMWTP responses to CBFO comments. Actions are deemed acceptable.

Action to Preclude Recurrence:

Since 2006, when CBFO approved this procedure, rigor within AMWTP Document Control process, including multi-disciplined reviewers and enhanced review process, has increased significantly, which ensures issues similar to MP-Q&SI-5.6 do not occur.

Evaluation:

The proposed corrective actions to preclude recurrence, as described, are deemed appropriate to address the condition adverse to quality addressed in the CAR.

Acceptance:

The evaluation of the results of the CAP indicate that the investigative actions and the proposed corrective actions to preclude recurrence satisfactorily address the condition adverse to quality documented in CAR 16-007. Therefore, it is recommended that CAR 16-007 be considered closed.

Cindi Castillo for

5/11/16

Evaluation Performed By: Harley Kirschenmann, Auditor

Date: