



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
JUN 29 2016



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

Subject: Issuance of CBFO Corrective Action Report 16-045 Identified During Audit A-16-18

Dear Mr. Cannon:

The Carlsbad Field Office (CBFO) performed Audit A-16-18 of the Idaho National Laboratory Central Characterization Program on June 14 – 16, 2016. Enclosed is Corrective Action Report (CAR) 16-045 addressing the condition adverse to quality identified during the audit.

Please provide a documented response for the CAR, ensuring that the required actions indicated in Block 11 are addressed, including a schedule for completion. Please return your response to me on or before the due date identified in Block 13a of the CAR form.

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

Sincerely,

Dennis S. Miehls
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

S. Ross, EM-43	*ED	S. Punchios, NWP	ED
M. Brown, CBFO	ED	A. Boyea, NWP	ED
J.R. Stroble, CBFO	ED	T. Peake, EPA	ED
M. Navarrete, CBFO	ED	E. Feltcorn, EPA	ED
N. Castaneda, CBFO	ED	R. Joglekar, EPA	ED
G. Birge, CBFO	ED	J. Kieling, NMED	ED
H. Cruickshank, CBFO	ED	R. Maestas, NMED	ED
J. Zimmerman, DOE-ID	ED	C. Smith, NMED	ED
B. Roberts, DOE-ID	ED	V. Daub, CTAC	ED
J. Britain, NWP	ED	P. Martinez, CTAC	ED
F. Sharif, NWP	ED	C. Castillo, CTAC	ED
D.E. Gulbransen, NWP	ED	B. Boyko, CTAC	ED
R. Reeves, NWP	ED	J. Schuetz, CTAC	ED
A.J. Fisher, NWP	ED	P. Hinojos, CTAC	ED
B. Pace, NWP	ED	G. White, CTAC	ED
I. Joo, NWP	ED	Site Documents	ED
J. Carter, NWP	ED	CBFO QA File	
V. Cannon, NWP	ED	CBFO M&RC	
B. Allen, NWP	ED	*ED denotes electronic distribution	



CBFO CORRECTIVE ACTION REPORT

1. CAR No.: 16-045		2. Activity Report No.: A-16-18		3. Page 1 of 2	
4. Controlling document: DOE/CBFO-94-1012 R12, Sections 1.2, 2.1.1.D CCP-TP-504 R18, Section 4.1.5				5. Responsible CBFO Manager: N/A	
6. Responsible organization: INL/CCP			7. CAQ discussed with: Irene Joo & Tom Clements		
8. Requirement: See Continuation Sheet					
9. Condition Adverse to Quality (CAQ): See Continuation Sheet					
10a. Significant CAQ? (If "Yes", go to block 14b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		11. Type of actions required:	
10b. Work Suspension recommended? (If "Yes", go to block 14b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		11a. Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
10c. WAP-related Deficiency?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		11b. Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
10d. Accelerated corrective action required? (If "Yes", go to block 14b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		11c. Causal Analysis? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
				11d. Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
12a. Trend Code: WP-01		12b. CAR Initiator: <i>Robert M. Boyko</i> Printed Name: Robert M. Boyko		06/29/16 Date	
13a. Response due date: 7-20-16					
13b. Required corrective action completion date: N/A					
14. Concurrence:		<i>D. S. Michals</i>		6-29-16	
a. Quality Assurance Director/Quality Assurance Representative:		Printed Name: Dennis S. Michals		Date	
b. CBFO Office of Quality Assurance Director: (If SCAQ, work suspension, or accelerated corrective action; otherwise mark as "N/A")		N/A		Date	
15. Acceptance of Proposed Corrective Actions:					
Printed Name and Title: _____				Date _____	
16. Acceptance of Corrective Action Completion:					
Printed Name: _____				Date _____	
17. Closure:					
Printed Name: _____				Date _____	

CAR CONTINUATION SHEET

1. CAR No: 16-045	2. Activity No: A-16-18	3. Page 2 of 2
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Block 8 Requirement:

CBFO-94-1012, CBFO QAPD, Rev. 12, Section 1.2;

"Personnel shall be trained and qualified to ensure they are capable of performing their assigned tasks and to ensure that job proficiency is maintained."

CBFO-94-1012, CBFO QAPD, Rev. 12, Section 2.1.1.D;

"Work shall be planned, authorized, and accomplished under controlled conditions using technical standards, QA requirements, and implementing procedures commensurate with applicable control levels."

CCP-TP-504, CCP Dose-to-Curie Survey Procedure for Remote Handled Transuranic Waste, Rev. 18, Section 4.1.5;

"Perform container measurements as follows:"

"[H] Measure AND record the neutron dose rate (mrem/hr) on Attachment 2 in the Dose Rate 1 field (N/A if not applicable)."

"[J] Measure AND record the gamma dose rate on Attachment 2 in the Dose Rate 2 field"

Block 9 Condition Adverse to Quality (CAQ):

Neutron measurements taken in accordance with CCP-TP-504, Rev. 18 are not accurate based on manufacturer recommendations for response time considerations*. CCP Operators performed work outside of procedural requirements by obtaining neutron readings for host site use, and were not trained in the proper use of the neutron instrumentation being utilized. In addition, no objective evidence was provided that the CCP Operators are trained in the use of the radiological instruments specified in the procedure.

*Note: Sources cited for proper neutron instrument response times:

- Thermo Fisher Scientific factory Technical Support Engineer (via phone)
- Thermo Fisher Scientific E-600 Technical Manual
- PNNL-14135, Rev. 1, *Radiation Protection Instrument Manual PNL-MA-562*, dated August 2009