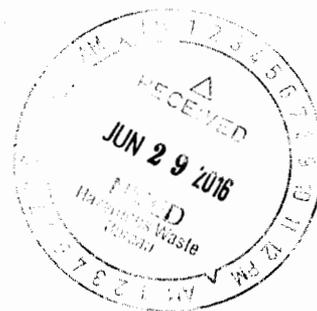




Department of Energy  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221  
 JUN 29 2016



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

Subject: Acceptance and Closure of CBFO CAR 16-035 *No TID Applied to Container* Resulting from Audit A-16-15

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) 16-035. The results of the verification are documented on the enclosed CAR Continuation Sheet, 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. Therefore, the CAR is considered closed.

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

Sincerely,

Martin P. Navarrete  
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

- |                       |      |                   |    |
|-----------------------|------|-------------------|----|
| S. Ross, EM-43        | * ED | A. Boyea, NWP     | ED |
| S. Cange, DOE-OR      | ED   | T. Peake, EPA     | ED |
| L. Wilkerson, DOE-OR  | ED   | E. Felcorn, EPA   | ED |
| M. Brown, CBFO        | ED   | R. Joglekar, EPA  | ED |
| J.R. Stroble, CBFO    | ED   | J. Kieling, NMED  | ED |
| D. Miehls, CBFO       | ED   | R. Maestas, NMED  | ED |
| G. Birge, CBFO        | ED   | C. Smith, NMED    | ED |
| N. Castaneda, CBFO    | ED   | V. Daub, CTAC     | ED |
| T. Carver, CBFO       | ED   | P. Martinez, CTAC | ED |
| P. Breidenbach, NWP   | ED   | C. Castillo, CTAC | ED |
| J. Blankenhorn, NWP   | ED   | R. Boyko, CTAC    | ED |
| J. Britain, NWP       | ED   | R. Castillo, CTAC | ED |
| F. Sharif, NWP        | ED   | R. Bradford, CTAC | ED |
| D. E. Gulbransen, NWP | ED   | K. Chester, CTAC  | ED |
| R. Reeves, NWP        | ED   | P. Hinojos, CTAC  | ED |
| A.J. Fisher, NWP      | ED   | G. White, CTAC    | ED |
| I. Joo, NWP           | ED   | Site Documents    | ED |
| J. Carter, NWP        | ED   | CBFO QA File      |    |
| B. Pace, NWP          | ED   | CBFO M&RC         |    |
| B. Allen, NWP         | ED   |                   |    |
| S. Punchios, NWP      | ED   |                   |    |

\*ED denotes electronic distribution



### CAR CONTINUATION SHEET

1. CAR No: 16-035

2. Activity No: A-16-15

3. Page 1 of 3

#### **Blocks 16 and 17 Acceptance of Corrective Actions Completion and Closure:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 16-035, including objective evidence and supporting documentation, submitted by Nuclear Waste Partnership LLC (NWP) letter QA:16:00281 UFC:2300.00, dated June 22, 2016, from Mr. V. K. Cannon, Manager, NWP Quality Assurance, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

Italicized text, taken verbatim from the Corrective Action Plan, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

#### **REMEDIAL ACTIONS**

*CCP has taken the following remedial action in response to the CAR condition:*

- 1. CCP has issued NCR-ORNL-0146-16 to control the container and to confirm the contents of X10C9311083A1.*

#### **Evaluation:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included NCR-ORNL-0146-16.

#### **INVESTIGATIVE ACTIONS**

*At ORNL, Visual Examination (VE) of Contact-Handled TRU waste is performed in the TWPC Box Breakdown Area (BBA), for those containers that are too heavy or too large to be processed in a glove box. On June 4, 2015, during VE of container X10C9311083A1, TWPC management called a stop work in the BBA due to issues unrelated to CCP. To prevent unauthorized access to the container, CCP VE personnel placed a TID on the door to the BBA, which is the only point of entry to the area.*

*Resolution of the issues required that ORNL personnel make entries to the BBA on June 11, 2015, and again on June 15, 2015. The BBA requires operators to be dressed in full PPE and be on breathing air. On both occasions, CCP VE operators were present to remove the TID and document the entry in the CCP Operational logbook. After ORNL personnel exited the BBA, CCP VE personnel placed another TID on the door to the BBA and made the appropriate entries in the CCP Operational logbook.*

*Following completion of the second entry on June 15, 2015, ORNL released the BBA back to CCP, and VE of container X10C9311083A1 was completed on June 16, 2015. Through oversight, CCP VE personnel neglected to enter into the CCP Operational logbook the removal of the TID that was placed on June 15, 2015. The lack of documentation in the logbook raises a question whether the container was left unattended at any time between removal of the TID and completion of VE. If so, this would render the contents of the container indeterminate.*

*When interviewed, VE operators stated that they removed the TID just before VE operations began, and that at no time was the container left unattended after the TID was removed. In their eagerness to begin working again, they simply forgot to make the required entry in the CCP Operational logbook.*

### CAR CONTINUATION SHEET

1. CAR No: 16-035

2. Activity No: A-16-15

3. Page 2 of 3

#### *Extent*

*To determine the extent of this issue, CCP Operational Logbooks were reviewed. The logbooks covered all VE operations conducted since the return of CCP to TWPC/ORNL in October of 2013. No other instances of this issue were found. This result provides strong support for the conclusion that the condition is isolated, limited to the condition described in the CAR.*

#### *Impact*

*Based on the investigation and the statements made by the VE operators regarding the time the TID was removed (just before VE) and that the container was never left unattended, CCP is extremely confident that the contents of the container are not indeterminate. However, to make absolutely sure there is no problem with the waste in container X10C9311083A1, NCR-ORNL-0146-16 was written and the container will be processed through Real-Time Radiography (RTR).*

#### **Evaluation:**

The investigative actions sufficiently explain the reasons for the condition adverse to quality identified in the CAR.

#### **CAUSAL ANALYSIS**

*Not required for this CAR.*

#### **Evaluation:**

Not applicable. No causal analysis is required.

#### **ACTIONS TO PRECLUDE RECURRENCE**

*The condition reported in the CAR does not represent a programmatic breakdown. To prevent recurrence, a briefing will be given to VE operators at TWPC on the importance of documenting TID controls applied to TRU waste during characterization activities.*

#### **COMMITMENTS**

#### **DUE DATES**

*CCP to issue NCR-ORNL-0146-16 to control the container and confirm the contents of X10C9311083A1 by performing RTR.*

*Complete*

*CCP to give a briefing to CH VE operators at TWPC on the importance of documenting TID controls applied to TRU waste during characterization activities.*

*June 15, 2016*

*Provide closure documentation to NWP Quality Assurance.*

*June 22, 2016*

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

*June 29, 2016*

**CAR CONTINUATION SHEET**

1. CAR No: 16-035	2. Activity No: A-16-15	3. Page 3 of 3
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**Evaluation:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required actions to preclude recurrence commitment. The evidence included 1) NCR-ORNL-0146-16, Rev. 0, dated 6/21/2016; 2) CBFO CAR 16-035, *Requirements and Documentation for the use of Tamper Indicating Devices (TIDs)*; and 3) a CCP briefing Attendance Sheet for CBFO CAR 16-035.

**CONCLUSION**

Based on the results of the review and verification of the original objective evidence included in the CAR 16-035 closure package, it is recommended that CAR 16-035 be closed.

*Katie Chester*

*6/28/16*  
Date:

Evaluation Performed By: Katie Chester, QA Auditor