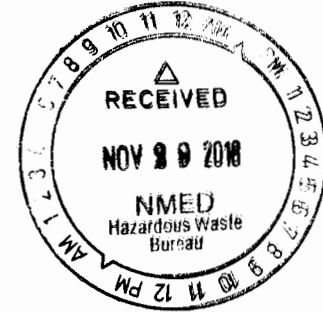




Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
NOV 29 2016

ENTERED



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

Subject: Acceptance of CAP for CAR 17-006 Resulting from CBFO Audit A-17-07

Dear Mr. Cannon:

Attached are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 17-006. The results of the review indicate that the CAP provides adequate measures to address the condition adverse to quality noted in the CAR; therefore, the CAP is approved. Upon completion of all corrective actions, please provide notification and supporting documentation so that verification activities may be performed.

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

Sincerely,

Martin P. Navarrete
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

S. Ross, EM-3.113	*ED	A. Boyea, NWP	ED
M. Brown, CBFO	ED	J. Walsh, EPA	ED
J.R. Stroble, CBFO	ED	T. Peake, EPA	ED
M. Navarrete, CBFO	ED	E. Feltcorn, EPA	ED
G. Birge, CBFO	ED	R. Joglekar, EPA	ED
N. Castaneda, CBFO	ED	J. Kieling, NMED	ED
T. Carver, CBFO	ED	R. Maestas, NMED	ED
L. Wilkerson, DOE-OR	ED	D. Biswell, NMED	ED
J. Britain, NWP	ED	V. Daub, CTAC	ED
F. Sharif, NWP	ED	P. Martinez, CTAC	ED
D. E. Gulbransen, NWP	ED	C. Castillo, CTAC	ED
R. Reeves, NWP	ED	M. Leroy, CTAC	ED
A.J. Fisher, NWP	ED	J. Schuetz, CTAC	ED
I. Joo, NWP	ED	P. Hinojos, CTAC	ED
B. Pace, NWP	ED	G. White, CTAC	ED
J. Carter, NWP	ED	Site Documents	ED
B. Allen, NWP	ED	CBFO QA File	
S. Punchios, NWP	ED	CBFO M&RC	

*ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 17-006	2. Activity No: A-17-07	3. Page 1 of 3
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Block # 15 Acceptance/Rejection of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-006. The CAP was submitted via NWP letter QA:16:00486 UFC:2300.00 (CBFO Unique # 16030004), dated November 21, 2016, from Mr. V. K. Cannon, Manager, Quality Assurance to Mr. M. P. Navarrete, Senior Quality Assurance Specialist, Carlsbad Field Office.

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

REMEDIAL ACTION(S)

CCP is taking/has taken the following remedial actions:

- 1. Updating the OAKES software in accordance with CCP-QP-022 to reflect current needs and requirements.*
- 2. Revising CCP-TP-200 to be entirely consistent with the updated OAKES software; the revised CCP-TP-200 will be issued after the OAKES software is complete through the CCP-QP-022 process.*
- 3. Notified cognizant personnel that the OAKES software is being updated and is not to be used until the update is complete and the revision to CCP-TP-200 is approved and issued.*

Evaluation

The remedial actions described in the CAP are adequate to correct the condition adverse to quality documented in the CAR.

INVESTIGATIVE ACTIONS

As originally designed, the OAKES software produced three checklists. In the course of reviewing and refining Revision Original of CCP-TP-200, SPM Chemical Compatibility Evaluation Memorandum and Acceptable Knowledge Assessment Review, CCP determined that only two checklists would be necessary. As a consequence, some work steps in CCP-TP-200 ended up being inconsistent with the OAKES database.

Cognizant CCP personnel were aware that the OAKES software was in need of updating for the checklists, and was not to be used. They also knew that a major update to the OAKES software was being developed, and decided to wait to make all the needed modifications at one time, rather than making one relatively minor modification followed by a major one. CCP-TP-200 was issued before OAKES was updated because the procedure gave guidance to Site Project Managers and Acceptable Knowledge Experts in reviewing Chemical Compatibility Evaluation Memorandums (CCEMs) and Acceptable Knowledge Assessment (AKA) documentation. Issuing CCP-TP-200 would provide the criteria for the reviews, which could next proceed, although completion of the checklists would have to wait until OAKES was updated to reflect the work steps in the procedure.

This approach was a departure from standard CCP practice, which is that procedure development and associated software must be managed such that that software and procedure requirements are always a match for one another. The process is iterative, and in virtually all cases, it is the procedure or proposed changes to the procedure that drive changes to the software.

Extent

There are two items of CCP-QP-022 software currently in-works, both of which are free of the issues reported in the CAR condition.

CAR CONTINUATION SHEET

1. CAR No: 17-006	2. Activity No: A-17-07	3. Page 2 of 3
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1. A new Waste Confirmation module is being created in the Integrated Data Center, for use by Regulatory and Environmental Services (RES). RES has confirmed that no procedure inconsistencies will result from development of the new module [SCO 1029, Addendum 57].
2. The OAKES software is being updated as described in the Remedial Actions section of this Corrective Action Plan. The actions will ensure that the updated OAKES software and the work steps in CCP-TP-200 will be consistent [SCO 1233, Addendum 1].

Impact

Because cognizant personnel were aware that the OAKES software was not up-to-date, it was not being used and there was no technical or quality impact from the reported condition.

Evaluation

The investigative actions described in the CAP are adequate to correct the condition adverse to quality documented in the CAR.

CAUSAL ANALYSIS

Not required for this CAR.

Evaluation

N/A

ACTIONS TO PRECLUDE RECURRENCE

CCP will issue a Lessons Learned describing the CAR condition and reminding personnel that procedure development and associated software must be managed such that software and procedure requirements are always a match for one another.

Evaluation

The actions to preclude recurrence described in the CAP are adequate to correct the condition adverse to quality documented in the CAR.

SCHEDULE FOR COMPLETION OF CORRECTIVE ACTIONS

COMMITMENTS

DUE DATES

- | | |
|--|-------------------|
| 1. CCP to notify cognizant personnel that the OAKES software is being updated and not to be used until the update is complete and the revision to CCP-TP-200 is approved and issued. | Complete |
| 2. CCP to update the OAKES software in accordance with CCP QP- 022 to reflect current needs and requirements. | December 22, 2016 |
| 3. CCP to revise CCP-TP-200 to be entirely consistent with the updated OAKES software; the revised CCP-TP-200 will be issued after the OAKES software is complete through the CCP-QP-022 process. | December 22, 2016 |
| 4. CCP to issue a Lessons Learned describing the CAR condition and reminding personnel that procedures and associated software must be managed such that software and procedure requirements are always a match for one another. | December 22, 2016 |
| 5. CCP to provide closure documentation to NWP Quality Assurance. | January 9, 2017 |
| 6. NWP QA to transmit closure documentation to the CBFO. | January 16, 2017 |

CAR CONTINUATION SHEET

1. CAR No: 17-006

2. Activity No: A-17-07

3. Page 3 of 3

Evaluation

The proposed schedule for completion of corrective actions is deemed to be acceptable. The expected completion date for all corrective actions is September 30, 2016.

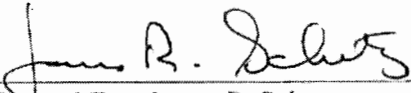
ACCEPTANCE

Evaluation of the CAP indicates that remedial actions, investigative actions, and actions to preclude recurrence satisfactorily address the condition adverse to quality identified in CAR 17-006. Therefore, it is recommended that the CAP for CAR 17-006 be approved.

The following items will be evaluated to verify completion of corrective actions, with supporting documentation provided in the CAR closure package.

- 1) Evidence of notification of cognizant personnel that the OAKES software is in the process of update and that personnel must not implement software applications or procedure steps until both are reviewed, finalized, approved, and issued.
- 2) Review of the revised and issued CCP procedure CCP-TP-200.
- 3) Review of the software quality assurance life-cycle documents for the finalized OAKES software version.
- 4) Review of the CCP Lessons Learned documentation that describes the CAR condition and provides reinforcement to personnel that procedures and associated software must be managed such that software and procedure work steps coordinate for proper implementation.

Other items related to completion of corrective actions included in the CAP will be evaluated as necessary.


Evaluation Performed By: James R. Schuetz

11/29/16
Date