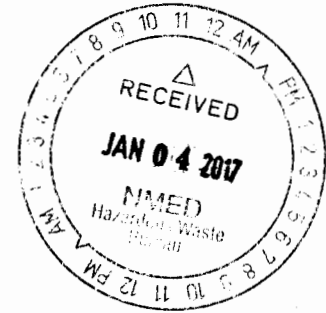




**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
JAN 4 2017

 **ENTERED**



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

Subject: Verification of Completion of Corrective Actions for CAR 17-006 from Audit A-17-07

Dear Mr. Cannon:

The Carlsbad Field Office (CBFO) performed a review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 17-006, which resulted from CBFO Audit A-17-07, Oak Ridge National Laboratory Central Characterization Program Waste Acceptance Criteria Compliance, conducted October 17 – 19, 2016. The results of the review and verification are documented on the enclosed CAR Continuation Sheets.

As described, the review and verification concluded that the associated corrective actions for remedial and investigative categories and actions to preclude recurrence have been fulfilled and are satisfactorily implemented. Therefore, CAR 17-006 is considered closed.

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

Sincerely,

Martin P. Navarrete  
Senior Quality Assurance Specialist

Enclosure



Mr. Val Cannon

-2-

cc: w/enclosure

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

CBFO QA File

CBFO M&amp;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 # 16 Acceptance of Corrective Action Completion:**

The Carlsbad Field Office (CBFO) has reviewed the Corrective Action Report (CAR) 16-015 closure package, including objective evidence and supporting documentation submitted via Nuclear Waste Partnership LLC (NWP) letter QA:16:00511:UFC:2300.00, from V. K. Cannon to D.S. Miehl, dated December 20, 2016, Subject: "TRANSMITTAL OF DOCUMENTATION SUPPORTING COMPLETION OF THE CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 17-006, WHICH RESULTED FROM CBFO AUDIT A-17-07, OAK RIDGE NATIONAL LABORATORY CENTRAL CHARACTERIZATION PROGRAM WASTE ACCEPTANCE CRITERIA."

Italicized text, taken verbatim from the revised Corrective Action Plan (CAP), is used to reflect the correlation between the actions required by the CAR, the actions completed, and the method used for verification.

**REMEDIAL ACTIONS (taken from the approved CAP)**

*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.*

**Verification:**

Software change order SCO 1233 related to changes to the OAKES database to align the functionality of the computer code with the work steps in the current version of CCP-TP-200, *Chemical Compatibility Evaluation Memorandum and Acceptable Knowledge Assessment Review*, was submitted in the closure package and was reviewed. Revision 1 of procedure CCP-TP-200 was verified to be the current version on the Q&MIS document management application, with an effective date of 12/14/2016. Remedial actions for item 1 above were determined to be complete and acceptable.

CCP-TP-200, Rev. 1, related to changes to align functionality of the OAKES database with the procedure language, was submitted in the closure package and was reviewed. Remedial actions for item 2 above were determined to be complete and acceptable.

An e-Mail from the CCP Certification Manager to CCP distribution related to suspension of implementation of CCP-TP-200 pending completion of changes to the OAKES database was submitted in the closure package and was reviewed. Remedial actions for item 3 above were determined to be complete and acceptable.

**INVESTIGATIVE ACTIONS (taken from the approved CAP)**

*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.*

### CAR CONTINUATION SHEET

1. CAR No: 17-006	2. Activity No: A-17-07	3. Page 2 of 3
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*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.*

- 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.*

**Verification:**

*Verification of investigative actions was performed as part of the evaluation of the CAP. Investigative actions were determined to be complete and acceptable.*

**ROOT CAUSE**

*A root cause analysis was not required for this CAR.*

**Verification:**

*N/A*

**ACTIONS TO PRECLUDE RECURRENCE (taken from the approved CAP)**

*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.*

### CAR CONTINUATION SHEET

1. CAR No: 17-006	2. Activity No: A-17-07	3. Page 3 of 3
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**Verification:**

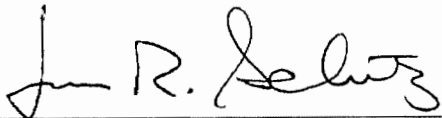
Lessons Learned document LL-2016-08 dated December 6, 2016, was submitted in the closure package and was reviewed. The document concerned implementation of procedures only after the procedures are verified to reflect the software functions to which they apply.

A document verifying personnel have acknowledged the contents of LL-2016-08 was submitted in the closure package and was reviewed. The scope of personnel acknowledging content of LL-2016-08 was determined to be adequate regarding the scope of corrective actions associated with CAR 17-006. Investigative actions as stated above were determined to be complete and acceptable.

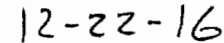
**ACCEPTANCE**

Review of objective evidence presented in NWP letter QA:16:00511:UFC:2300.00 indicates that the remedial and investigative actions and actions to preclude recurrence, as stated in the approved CAP, have been completed and satisfactorily address all conditions adverse to quality identified in CAR 17-006.

Therefore, the closure of CBFO CAR 17-006 is recommended.



Verification Performed By: James R. Schuetz



Date: