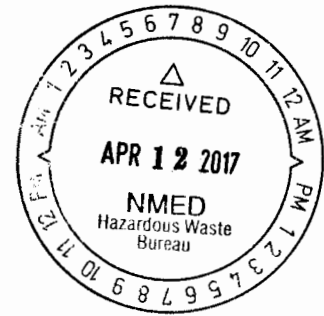




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
APR 12 2017



Ms. Mary McDaniel, Manager
Quality and Contractor Assurance
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Evaluation of the Proposed CAP for CBFO CAR 17-012, Audit A-17-05

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) has evaluated the Corrective Action Plan (CAP) provided to address Corrective Action Report (CAR) 17-012, which resulted from Audit A-17-05 of the Nuclear Waste Partnership LLC (NWP) Waste Isolation Pilot Plant (WIPP) Industrial Safety Air Quality Monitoring Program. The audit was conducted January 24 – 26, 2017 at the WIPP. The results of the evaluation are provided in the attached CAR Continuation Sheets.

The results of the evaluation indicate that the CAP for CAR 17-012 does not provide adequate measures to address the impact/extent and reduce the likelihood of recurrence of the conditions noted in the CAR. The CAP is therefore rejected. Please revise the CAP for CAR 17-012 and resubmit for review and approval by May 2, 2017.

If you have any questions concerning the CAP evaluation, please contact me at (575) 234-7483.

Sincerely,

[Handwritten signature of Martin P. Navarrete]

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

- M. Brown, CBFO *ED J. Kieling, NMED ED
D. Miehl, CBFO ED R. Maestas, NMED ED
M. Stapleton, CBFO ED D. Biswell, NMED ED
M. Fineran, CBFO ED V. Daub, CTAC ED
E. Garza, CBFO ED P. Martinez, CTAC ED
R. Elmore, CBFO ED C. Castillo, CTAC ED
M. Heard, CBFO ED M. Leroch, CTAC ED
J. Britain, NWP ED P. Yanez, CTAC ED
B. P. Shagula, NWP ED J. Vernon, CTAC ED
V. Ballew, NWP ED J. Fernandez, CTAC ED
S. Punchios, NWP ED P. Hinojos, CTAC ED
A. Boyea, NWP ED G. White, CTAC ED
J. Ellis, NWP ED CBFO QA File
J. Walsh, EPA ED CBFO M&RC
T. Peake, EPA ED *ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 17-012	2. Activity No: A-17-05	3. Page 1 of 2
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Block 15 Acceptance of Proposed Corrective Actions

An evaluation was performed of the Corrective Action Plan (CAP) developed to address the Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-012. The CAP was submitted to Martin Navarrete, Senior Quality Assurance Specialist, via Nuclear Waste Partnership LLC (NWP) transmittal QA:17:00098, dated April 4, 2017, from Ms. Mary McDaniel, Manager, Quality and Contractor Assurance.

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 and Investigative Actions:

- *Identify replacement options for the IS/IH Sampling Database – Completion Date June 15, 2017*
- *Rescreen IS/IH Sampling Database for the Controlled Software List (CSL) – Completion Date April 25, 2017*

Review WP 16-IT1003, Acquisition of Hardware and Software, Revision 0, section 3.3

- *A review of WP 16-IT1003 concluded that the software in question was put into service prior to the issue date of Revision 0, 04/07/14. Such software use is non-compliant with section 3.3, Database Software*
- *This condition adverse to quality is a legacy issue caused by internal development of a storage/retrieval database by previous personnel. At that time, WP 16-IT1003, Acquisition of Hardware and Software, had not been issued.*
- *There is no other mainframe resident software, or database software in use by the NWP IS/IH department.*
- *IS/IH Sampling Database does not perform calculations relevant to regulatory compliance. It is a storage and retrieval database only. As such, there are no immediate negative implications for continued use of this software.*
- *The impact of removing this Sampling Database from use until a replacement is found would be significant. Paper records of sampling and monitoring results would not generate summary reports, nor allow for the evaluation of results or the observation of trending.*
- *This database will continue to be utilized until a replacement is found. IRM does not support or approve the end user database software. The loss of data is mitigated by weekly local backup in the IS/IH department.*

Action(s) to Preclude Recurrence:

NWP IS/IH will check all new software to be purchased for the department per WP 16-IT1003. This requirement will be reinforced in the IS/IH group via a documented briefing or required reading. IS/IH Sampling Database will be rescreened for the CSL.

Completion Date: April 27, 2017

CAR CONTINUATION SHEET

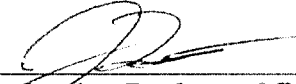
1. CAR No: 17-012	2. Activity No: A-17-05	3. Page 2 of 2
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Evaluation:

The remedial and investigative actions described above are insufficient to address the conditions adverse to quality. The CAP only addresses replacement options for the IS/IH Sampling Database and does not offer a replacement plan to include project milestones and a risk analysis to describe the risk associated with the IS/IH Sampling Database and recommend risk mitigation strategies. The investigative actions do not look beyond the NWP IS/IH department. An investigation of all NWP software is warranted to ensure there is no other software applications in use that are non-compliant with WP 16-IT1003. The investigative actions further do not describe why FileMaker is allowed to be used by IRM and IS/IH in its current non-compliant condition and with the associated risks. The investigative actions do not describe the procedure for conducting a weekly local backup, including the steps for conducting the backup and the testing of the backup system.

Acceptance:

The results of the evaluation of the CAP indicate that the investigative actions and extent/impact are insufficient to address conditions adverse to quality documented in the CAR. Therefore, it is recommended that the CAP for CAR 17-012 be rejected.



Evaluation Performed By: Jim Vernon, CTAC

4-12-17

Date