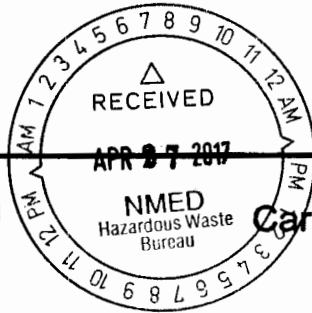


United States Government

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Department of Energy

# memorandum



Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: APR 27 2017  
REPLY TO  
ATTN OF: CBFO:OQA:MPN:BA:17-1157:UFC 2300.00

SUBJECT: Verification and Acceptance of Documentation Supporting Completion of the Corrective Actions for CBFO CAR 17-009

TO: Mr. James A. Maimo, DOE-ID

The Carlsbad Field Office (CBFO) has verified the documentation provided by the Waste Disposition Division for Corrective Action Report (CAR) 17-009, which resulted from Audit A-17-04 of the Advanced Mixed Waste Treatment Project. The results of the evaluation are provided in the attached CAR Continuation Sheet.

The results of the evaluation indicate that the verification for CAR 17-009 does provide adequate measures to address the impact/extent and reduce the likelihood of recurrence of the condition noted in the CAR; therefore, CAR 17-009 is closed.

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

Martin P. Navarrete  
Senior Quality Assurance Specialist

Attachment

- cc: w/attachment
- S. Ross, EM-3.113 \* ED
- M. Brown, CBFO ED
- J.R. Stroble, CBFO ED
- D. Miehl, CBFO ED
- M. Fineran, CBFO ED
- M. Stapleton, CBFO ED
- N. Castaneda, CBFO ED
- J. Zimmerman, DOE-ID ED
- T. Jenkins, DOE-ID ED
- J. Vliet, DOE-ID ED
- D. Pruitt, DOE-ID ED
- G. Byram, AMWTP ED
- E. Dumas, AMWTP ED
- J. Floerke, AMWTP ED
- A. Morse, AMWTP ED
- G. Tedford, AMWTP ED
- S. Winterbottom, AMWTP ED

- J. Walsh, EPA ED
- J. Ellis, 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
- P. Martinez, CTAC ED
- C. Castillo, CTAC ED
- M. Leroch, CTAC ED
- G. Knox, CTAC ED
- P. Hinojos, CTAC ED
- G. White, CTAC ED
- Site Documents ED
- CBFO QA File
- CBFO M&RC

\*ED denotes electronic distribution



**CAR CONTINUATION SHEET**

1. CAR No: 17-009

2. Activity No: A-17-04

3. Page 1 of 3

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

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 17-009, including objective evidence and supporting documentation, submitted by Fluor, Idaho: letter CCN 320549, dated March 28, 2017, from Mr. Thomas J. Dieter, Director, Waste Management, to Mr. James A. Malmo, Assistant Manager, Waste Disposition Project.

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

***Remedial and Investigative Actions: Actionee: Brian Warner***

*MP-COPS-9.9 has been superseded by MCP-2980.*

*In discussions with operator, abnormal conditions are reported to the Shift Supervisor (SS) when they are discovered. Documentation of the notification by the operator and follow up review of the logs by the SS for accuracy of log entries (including identifying the who, what, why, where, and when) needs to be improved across the AMWTP.*

*Operator did not perform log entries and make correct notifications to management as required corresponding to A3BIC03 Incorrect Performance Due to Mental Lapse with contributing cause of A3BIC01 Check of Work LTA due to Shift Supervisors are not identifying log keeping errors during required reviews of shift logs.*

**Verification:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence is the requested PDF copy of procedures MCP-2980, Rev. 7, *Logkeeping*, which superseded MP-COPS-9.9, and MCP-4056, Rev. 1, *Supplemental Directions Associated with AMWTP Operations*. MCP-2980 provides the minimum standards for establishing and maintaining operating logs for recording the data. MCP-4056, Section 4.7, *Logkeeping* augments and provides added detail necessary for AMWTP operating groups on AMWTP logkeeping to ensure clear understanding at the operator level. In addition, a tailgate training (TGITG037) was created to discuss the CAQ and train operators on proper documentation.

***Investigative Extent of Condition Review:***

*MAR 106496 was completed for review of eSOMs log in all AMWTP areas for content, timeliness of entries, documentation of off normal systems events, notifications, and follow up actions per MCP-2980, Log Keeping and MCP-4056, Supplemental Directions Associated with AMWTP Operations. Log reviews covered four operating days including backshift and weekend crews.*

*During the review, some log entries were identified where additional detail could have been included. The log entries were updated; however, detail needed when logging of abnormal events is subjective by nature.*

### CAR CONTINUATION SHEET

1. CAR No: 17-009

2. Activity No: A-17-04

3. Page 2 of 3

*The assessment determined that the comprehensive tailgate, identified in AI 106852, should be completed by identified personnel. This action would be followed up with monitoring of eSOMs using the management observation program.*

**Verification:**

Investigative extent of condition was evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MPN:BA:17-1098:UFC 2300.00.

**Causal Analysis**

*Not required for this CAR.*

**Revised Action to Preclude Recurrence:**

- *AI 106852 - Perform tailgate training for operators and supervisors to include:*
- *The log keeping deficiencies identified during the CBFO audit,*
- *Provide examples of good log entries regarding abnormal events,*
- *Have operators/supervisors practice generating log entries for a simulated abnormal event (note: practice entries should be on paper, not in eSOMS),*
- *Present Shift Supervisors a set of logs to review and have them identify any deficiencies with the logs.*

*AI 106853 - MAR 106496 was completed and it was determined that completion of the comprehensive tailgate training identified in AI 106852 and follow up monitoring using management observations will reduce the likelihood of recurrence.*

*AI 106854 - MAR 106496 was completed and it was determined that completion of the comprehensive tailgate training identified in AI 106852 and follow up monitoring using management observations will reduce the likelihood of recurrence. No additional audience for completion of the tailgate was identified over and above the audience identified in AI 106852.*

**Commitments**

*AI 106852 – Perform TG training for Operators and Supervisors*

*AI 106854 – Generate additional targeted corrective actions based on the results of MAR 106496*

*MAR 106496 – Assess Log Keeping per MCP-2980*

*AI 108573 – Present TGITG037 (attached) to the identified AMPWTP/ARP personnel*

*AI 108574 – Present TGITG037 (attached) to the identified TF personnel*

**Due Dates**

*Completed 03/13/17*

*Completed 03/07/17*

*Completed 03/07/17*

*06/01/17*

*06/01/17*

**CAR CONTINUATION SHEET**

1. CAR No: 17-009

2. Activity No: A-17-04

3. Page 3 of 3

**Verification:**

The objective evidence submitted in the closure package including the requested signed training rosters and procedures, was reviewed and verified to meet the remedial actions, investigative/extent of conditions and action to preclude reoccurrence. The objective evidence included:

(1) EM-WDP-17-003 Closure Package

- Training Course Report for TGITG037
- Example of the TGITG037 material
- AI 106852 – *Perform TG training for Operators and Supervisors*
- AI 106854 – *Generate additional targeted corrective actions based on the*
- AI 108573 – *Present TGITG037 (attached) to the identified AMPWTP/ARP*
- AI 108574 – *Present TGITG037 (attached) to the identified TF personnel*

(2) PDF copy of *Tailgate Training* – Logkeeping signed training rosters for TGITG037

(3) PDF copy of MCP-2980, Rev. 7, *Logkeeping*

(4) PDF copy of MCP-4056, Rev. 1, *Supplemental Directions Associated with AMWTP Operations*

**CONCLUSION**

Based on the results of the review and verification of the original objective evidence included in the CAR 17-009 closure package and the additional requested objective evidence regarding signed training rosters and procedures, it is recommended that CAR 17-009 be closed.

Verification Performed By: John Fernandez, MQA-1 Auditor

4/26/2017  
Date