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



MAY 09 2017

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

Subject: Evaluation and Acceptance of the CAP for CAR 17-014 Resulting from 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) 17-014 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 enclosed CAR Continuation Sheet.

The results of the evaluation indicate that the CAP for CAR 17-014 does provide adequate measures to address the impact/extent and reduce the likelihood of recurrence of the conditions noted in the CAR. However, to accept the CAP, the timeline for comments must be adjusted in order to provide closure documentation to the CBFO Office of Quality Assurance by August 30, 2017. Please provide a revised CAP with new commitment dates.

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

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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CAR CONTINUATION SHEET

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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) 17-014. The CAP was submitted to Martin Navarrete, Senior Quality Assurance Specialist, via Nuclear Waste Partnership LLC (NWP) transmittal QA:17:00142, dated April 26, 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 Actions:

- *Each IH procedure will be assigned to a Point of Contact and a Subject Matter Expert. The IH procedures to be assigned POCs and SMEs are:*
 - *12-IH.01, WIPP CHEMICAL HYGIENE PLAN*
 - *12-IH.02, WIPP INDUSTRIAL HYGIENE PROGRAM MANUAL*
 - *12-IH.02-1, WIPP IH PROGRAM – HEALTH HAZARD ASSESSMENT*
 - *12-IH.02-10, WIPP IH PROGRAM – INORGANIC LEAD MANAGEMENT PROGRAM*
 - *12-IH.02-11, WIPP IH PROGRAM – POLYCHLORINATED BIPHENYLS (PCBS)*
 - *12-IH.02-12, WIPP INDUSTRIAL HYGIENE PROGRAM – CRYOGENICS, ...*
 - *12-IH.02-13, INDUSTRIAL HYGIENE PROGRAM – APPROVED PLASTIC SUIT, AIRLINE*
 - *12-IH.02-14, INDUSTRIAL HYGIENE PROGRAM – APPROVED PLASTIC HOOD, AIRLINE*
 - *12-IH.02-15, INDUSTRIAL HYGIENE PROGRAM – HEAT STRESS*
 - *12-IH.02-16, INDUSTRIAL HYGIENE PROGRAM – ASBESTOS MANAGEMENT*
 - *12-IH.02-18, INDUSTRIAL HYGIENE PROGRAM – INDOOR AIR QUALITY*
 - *12-IH.02-2, WIPP IH PROGRAM – CONFINED SPACES*
 - *12-IH.02-3, WIPP IH PROGRAM – HAZARDOUS WASTE OPERATIONS AND EMERGENCY ...*
 - *12-IH.02-4, WIPP IH PROGRAM – HAZARD COMMUNICATION AND HAZARDOUS ...*
 - *12-IH.02-5, WIPP IH PROGRAM – HEARING CONSERVATION*
 - *12-IH.02-6, WIPP IH PROGRAM – RESPIRATORY PROTECTION*
 - *12-IH.02-7, WIPP IH PROGRAM – LASERS, LIGHTING, PEST CONTROL, SANITATION*
 - *12-IH.02-8, WIPP IH PROGRAM – OFFICE AND INDUSTRIAL ERGONOMICS*
 - *12-IH.02-9, WIPP IH PROGRAM – BERYLLIUM EXPOSURE PREVENTION PROGRAM*
 - *12-IH1004, NOISE SURVEYS*
 - *12-IH1006, AIRBORNE CONTAMINANT SAMPLING*
 - *12-IH1007, PERSONAL SAMPLING PUMP CALIBRATION*
 - *12-IH1008, INDOOR AIR QUALITY EVALUATIONS AND RESPONSE*
 - *12-IH1020, ABNORMAL CONDITION INVOLVING CRYOGENICS/INERT GAS*
 - *12-IH1200, HEAT STRESS*
 - *12-IH1202, MAINTAINING PAPRS FOR USE*
 - *12-IH1815, LOCAL EXHAUST ANNUAL FACE VELOCITY TESTING*

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- 12-IH1828, MSHA AIR QUALITY MONITORING
- 12-IS1005, RESPIRATOR/FACEPIECE CLEANING AND INSPECTION
- 12-IS1810, QUANTITATIVE FIT TESTING
- Revise WP 12-IH1006 to state the personnel qualification requirements to perform IH work.
- Revise WP 12-IH1007 to:
 1. Reference SAF-101
 2. Evaluate forms associated with WP 12-IH1007 and add, subtract or revise as necessary.
 3. Accurately state the requirements for record generation.
 4. State the personnel qualification requirements to perform IH work.

Investigative Actions:

WP 12-IH1006, WP 12-IH1007, and WP 12-IH1022 were reviewed to determine the clarity of personnel qualifications. It was determined that 12-IH1006, 12-IH1007, 12-IH1022 require revision to state, "personnel are qualified to perform work through the WIPP training and qualification program," or similar language.

- WP12-IH1006, Airborne Contaminant Sampling, WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1022, Sampling for Waste Generated VOCs, were reviewed for adequacy, correctness and completeness. It was determined that certain IH practices had evolved that were incompletely captured in the various procedures.
- A rapid expansion of the IH department scope and role caused IH to rely on skills that are standard throughout the trade, rather than detailed procedures. This practice caused the Condition Adverse to Quality (CAQ) to happen.
- As the auditors themselves stated, "Personnel are qualified to perform work through the WIPP training and qualification program." This program assures that IH technical representatives possess the appropriate skills to perform their jobs effectively. There are no adverse effects to the overall department program due to these minor procedural discrepancies and incomplete reference source lists.
- Other department procedures were reviewed. No further discrepancies were noted.

Root Cause:

Not required.

Apparent Cause A4B1C04

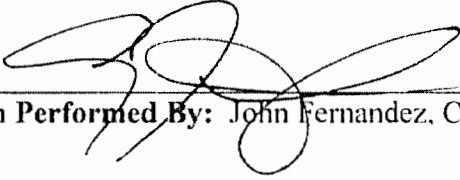
Management follow-up or monitoring of activities did not identify problems.

Action(s) to Preclude Recurrence:

Each IH procedure will be assigned to a Point of Contact and a Subject Matter Expert. This requirement will be reinforced in the IS/IH group via a documented briefing or required reading.

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Commitments	Due Dates
<i>Each IH procedure will be assigned to a Point of Contact and a Subject Matter Expert.</i>	06/15/17
<i>Revise WP 12-IH1006 to state the personnel qualification requirements to perform IH work.</i>	07/25/17
<i>Revise WP 12-IH1007 to:</i> <ul style="list-style-type: none">• <i>Reference SAF-101</i>• <i>Evaluate forms associated with WP 12-IH1007 and add, subtract or revise as necessary.</i>• <i>Accurately state the requirements for record generation</i>• <i>State the personnel qualification requirements to perform IH work</i>	07/25/17
<i>Provide a Management Observation on WP 12-IH1007 and WP 12-IH1022 to assure that records are properly handled and maintained in accordance with those procedures.</i>	10/16/17
<i>Provide closure documentation to NWP Quality Assurance.</i>	10/31/17
<i>NWP QA, transmit closure documentation to the CBFO.</i>	11/15/17
Evaluation: <p>The remedial actions, investigative actions and actions to preclude recurrence described above are sufficient to address the conditions adverse to quality. The review and revision of the IH procedures listed above, along with the designation of Points of Contact and Subject Matter Experts for each of those procedures is acceptable.</p>	
Acceptance: <p>The results of the evaluation of the CAP indicate that the investigative actions and extent/impact are sufficient to address conditions adverse to quality documented in the CAR. Therefore, it is recommended that the CAP for CAR 17-014 be accepted.</p>	
 Evaluation Performed By: John Fernandez, CTAC	<u>5/2/17</u> Date