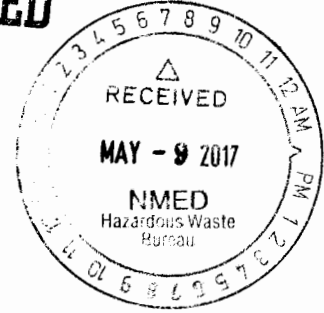




ENTERED

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 17-013 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) 17-013 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 Sheets.

The results of the evaluation indicate that the CAP for CAR 17-013 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

M. Brown, CBFO	* ED	R. Maestas, NMED	ED
D. Miehl, CBFO	ED	D. Biswell, NMED	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, EPA	ED	CBFO QA File	
J. Walsh, EPA	ED	CBFO M&RC	
T. Peake, EPA	ED	*ED denotes electronic distribution	
J. Kieling, NMED	ED		



### CAR CONTINUATION SHEET

1. CAR No: 17-013

2. Activity No: A-17-05

3. Page 1 of 3

#### 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) 17-013. 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:**

- *Add applicable reference numbers for updated Electronic Forms for Personal Sampling and Area Air Sampling to WP 12-IH1006.*
- *Conduct a briefing or required reading with the IS/IH group on IH procedures and associated forms to assure controlled forms are used for all data and records required by the following procedures:*
  - *12-IH.02-1, WIPP IH Program – Health Hazard Assessment*
  - *12-IH.02-18, WIPP IH Program – Indoor Air Quality*
  - *12-IH.02-4, WIPP IH Program – Hazard Communication Program*
  - *12-IH.02-6, WIPP IH Program – Respiratory Protection 12-IH1004, Noise Surveys*
  - *12-IH1006, Airborne Contaminant Sampling*
  - *12-IH1022, Sampling for Waste Generated VOCs*
  - *12-IH1200, Heat Stress*
  - *12-IH1300, Confined Space Entry*
- *Review other IH procedures to assure controlled forms are used for all data and records.*

#### **Investigative Actions:**

*Review WP 12-IH1006, Airborne Contaminant Sampling*

- *WP 12-IH1006 was reviewed. It was determined that the procedure lacked the references for appropriate forms.*
- *It was determined that as the IH program complexity and staffing level evolved, various user-created forms were used to informally collect field information. This information was then transferred into a department database for storage and retrieval. The need for controlling the forms was not recognized.*
- *Information from the field note forms was transferred to a department database; no records were lost in the process, although the data collection forms lacked formality and document control.*
- *Other IH procedures were reviewed, including 12-IH.02-1, WIPP IH Program – Health Hazard Assessment, 12-IH.02-18, WIPP IH Program – Indoor Air Quality, 12-IH.02-4, WIPP IH Program – Hazard Communication Program, 12-IH.02-6, WIPP IH Program – Respiratory Protection, 12-IH1004, Noise Surveys and 12-IH1022, Sampling for Waste Generated VOCs to assure controlled forms are used for all data and records. No other discrepancies were determined.*

**CAR CONTINUATION SHEET**

1. CAR No: 17-013	2. Activity No: A-17-05	3. Page 2 of 3
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**Root Cause:**  
*Not required.*

**Apparent Cause A4B1C04**  
*Management follow-up or monitoring of activities did not identify problems*

**Action(s) to Preclude Recurrence:**

- *Conduct a briefing or required reading with the IS/IH group on IH procedures to assure controlled forms are used for all data and records.*
- *Add Electronic Attachments for Personal Air Sampling to WP 12-IH1006.*

**Commitments**

*Review other IH Procedures to assure controlled forms are used for all data and records*

**Due Dates**  
*Complete*

*Conduct a briefing or required reading with the IS/IH group on IH procedures to assure controlled forms are used for all data and records.* 05/31/17

*Add references to Controlled Electronic Forms for Personal Air Sampling and Area Air Sampling to WP 12-IH1006.* 06/15/17

*Perform a Management Observation in 3 months to assure use of controlled forms.* 09/15/17

*Provide closure documentation to NWP Quality Assurance.* 09/27/17

*NWP QA, transmit closure documentation to the CBFO.* 10/10/17

**Evaluation:**

The remedial actions, investigative actions and actions to preclude recurrence described above are sufficient to address the conditions adverse to quality. The remedial actions address the use of uncontrolled forms and are being given electronic reference numbers for Personal and Area Air Sampling. Through investigative actions, the procedures that use controlled forms for data and recording data were reviewed addressing extent/impact to collection of data and records. Conducting the briefing or required reading, along with adding the electronic attachments to WP 12-IH1006 and above investigative actions were evaluated and accepted to address the condition adverse to quality.

### CAR CONTINUATION SHEET

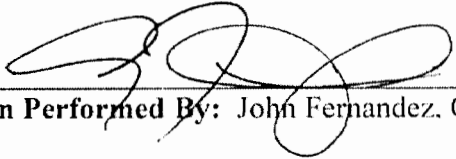
1. CAR No: 17-013

2. Activity No: A-17-05

3. Page 3 of 3

**Acceptance:**

The results of the evaluation of the CAP indicate that the remedial and 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 17-013 be accepted.



Evaluation Performed By: John Fernandez, CTAC

5/2/17

Date