

ENTERED



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
MAY 25 2017



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

Subject: Issuance of CBFO CAR 17-037 Identified During Audit A-17-17

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) performed Audit A-17-17 of the Nuclear Waste Partnership LLC (NWP) Central Characterization Program/Los Alamos National Laboratory on May 16 – 18, 2017. Enclosed is Corrective Action Report (CAR) 17-037 addressing the condition adverse to quality identified during the audit.

Please provide a documented response for the CAR, ensuring that the required actions indicated in Block 11 are addressed, including a schedule for completion of corrective actions. Please return your response to me on or before the due date identified in Block 13a of the CAR form.

If you have any questions or comments concerning the CAR, please contact me at (575) 234-7491.

Sincerely,

A handwritten signature in cursive script that reads "D. S. Miehls".

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure



Ms. Mary McDaniel

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MAY 25 2017

cc: w/enclosure

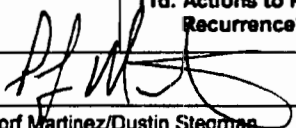
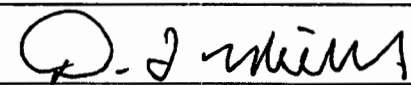
M. Brown, CBFO	*ED
J.R. Stroble, CBFO	ED
M. Navarrete, CBFO	ED
N. Castaneda, CBFO	ED
P. Breidenbach, CBFO	ED
B. Covert, NWP	ED
J. Britain, NWP	ED
F. Sharif, NWP	ED
M. Percy, NWP	ED
A.J. Fisher, NWP	ED
B. Pace, NWP	ED
J. Harvill, NWP	ED
J. Carter, NWP	ED
T. Mojica, NWP	ED
T. Groover, NWP	ED
S. Martinez, NWP	ED
V. Ballew, NWP	ED
S. Punchios, NWP	ED
A. Boyea, NWP	ED
J. Walsh, EPA	ED
J. Ellis, EPA	ED
T. Peake, EPA	ED
E. Feltcom, EPA	ED
R. Joglekar, EPA	ED
J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
T. Runyon, CTAC	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
M. Leroch, CTAC	ED
R. Castillo, CTAC	ED
R. Bradford, CTAC	ED
D. Stegman, CTAC	ED
P. Hinojos, CTAC	ED
D. Harvill, CTAC	ED
G. White, CTAC	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CBFO CORRECTIVE ACTION REPORT

1. CAR No.: 17-037		2. Activity Report No.: A-17-17		3. Page 1 of 2	
4. Controlling document: CCP-TP-113 Rev. 20		5. Responsible CBFO Manager: N/A			
6. Responsible organization: NWP/CCP		7. CAQ discussed with: Tommy Mojica/Terri-Anne Groover/Shelley Martinez			
8. Requirement: See Continuation Sheet					
9. Condition Adverse to Quality (CAQ): See Continuation Sheet					
10a. Significant CAQ? (If "Yes", go to block 14b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		11. Type of actions required:	
10b. Work Suspension recommended? (If "Yes", go to block 14b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		11a. Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
10c. WAP-related Deficiency?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		11b. Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
10d. Accelerated corrective action required? (If "Yes", go to block 14b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		11c. Causal Analysis? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
				11d. Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
12a. Trend Code: VE-06		12b. CAR Initiator:  Printed Name: Porf Martinez/Dustin Stegman		Date: 5/25/17	
13a. Response due date: 6-21-17					
13b. Required corrective action completion date: N/A					
14. Concurrence:					
a. Quality Assurance Director/Quality Assurance Representative:		 Printed Name: Dennis S. Michls		Date: 5-25-17	
b. CBFO Office of Quality Assurance Director: (If SCAQ, work suspension, or accelerated corrective action; otherwise mark as "N/A")		N/A		Date:	
15. Acceptance of Proposed Corrective Actions:					
Printed Name and Title:		Date:			
16. Acceptance of Corrective Action Completion:					
Printed Name:		Date:			
17. Closure:					
Printed Name:		Date:			

CAR CONTINUATION SHEET

1. CAR No: 17-037	2. Activity No: A-17-17	3. Page 2 of 2
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8. Requirement:

CCP Standing Order CCP-SO-LANL-70, Rev. 0, Dated 11/30/15, states: "When performing VE, if liquids or previously absorbed liquids are encountered, perform the following prior to packaging absorbed liquid:

1. Obtain the following information from the host site, as applicable:
 - a. Documentation of the amount of liquid and type of liquid (documentation may be either process knowledge or laboratory analysis).
 - b. Documentation of the pH of the liquid.
 - c. Documentation of any treatment that was performed and any neutralization chemicals used.
 - d. If the liquid was neutralized, documentation of the pH following neutralization.
 - e. Documentation of the absorbent used.
2. If the absorbent materials and/or neutralization chemicals are not identified in the applicable Acceptable Knowledge report contact the SPM and AKE.
3. Label the documentation as follows:
Supplemental Information for Container____, BDR____, Page__of____
4. Include a note in the comment section of CCP-TP-113 Attachment 2, Section 1 to refer to the supplemental information.
5. Submit the documentation with the BDR. And provide a copy to the SPM.

9. Condition Adverse to Quality (CAQ):

During review of visual examination (VE) batch data report (BDR) LAVE030054, container #70998, the VE operators identified items such as wipe-all, diaper paper, paper towels, Kim wipes, and cheesecloth evidencing previously absorbed liquids, requiring implementation of CCP Standing Order CCP-SO-LANL-70, Rev. 0. No objective evidence was attached to the BDR supporting the implementation of the referenced Standing Order.

WASTE ISOLATION PILOT PLANT
U.S. DEPARTMENT OF ENERGY
Carlsbad Field Office

INSTRUCTIONS FOR PROVIDING A CORRECTIVE ACTION PLAN

You are requested to provide a corrective action plan (CAP) in response to this corrective action report (CAR) by the completion date identified in block 13b of the CAR. If this date cannot be met, provide a written request for extension to the Quality Assurance Representative with courtesy copy to the Office of Quality Assurance Director. This request must include justification for the delay and must be provided seven calendar days prior to the response due date (CAR block 13a).

The CAP shall address the corrective actions indicated in CAR block 11. As appropriate, develop the plan in accordance with the following sequence and format:

In order to develop the CAP, perform an investigative action to determine the extent and impact of the deficiency and to identify the causal factors. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 11.

1. Corrective action response for CAR # 17-037
 - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during discovery.
 - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
 - C. **Causal Analysis**-Identify the causal factor(s) of the CAR condition. Refer to Step 5.3.2 if the CAR was issued to CBFO or Step 5.3.3 if the CAR was issued to a participant organization.
 - D. **Actions to Preclude Recurrence**-Identify the corrective actions required to address the causal factors of the condition in order to preclude recurrence.

NOTE: Schedule for completion of corrective actions is always required.

2. For each action above, identify the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.