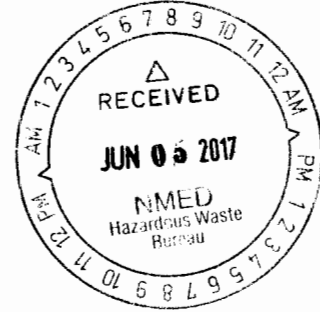




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUN 5 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 17-032

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) has evaluated the Corrective Action Plan (CAP) provided to address Corrective Action Report (CAR) 17-032, which resulted from Audit A-17-21 of the recertification of the Central Characterization Program at Oak Ridge National Laboratory (ORNL). The audit was conducted April 18-20, 2017, at ORNL.

The results of the evaluation are provided in the enclosed CAR Continuation Sheets and indicate that the CAP for CAR 17-032 is acceptable. Please submit the CAR closure documentation when complete.

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

Sincerely,

Martin P. Navarrete, CBFO
Office of Quality Assurance

Enclosure

cc: w/enclosure

| | | | |
|---------------------|-----|-------------------|----|
| J. Carswell, CBFO | *ED | J. Ellis, NWP | ED |
| M. Brown, CBFO | ED | J. Walsh, EPA | ED |
| D. Miehl, CBFO | ED | T. Peake, EPA | ED |
| M. Stapleton, CBFO | ED | J. Kielling, NMED | ED |
| M. Fineran, CBFO | ED | R. Maestas, NMED | ED |
| E. Garza, CBFO | ED | D. Biswell, NMED | ED |
| R. Elmore, CBFO | ED | T. Runyon, CTAC | ED |
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| V. Ballew, NWP | ED | G. White, CTAC | ED |
| S. Punchios, NWP | ED | CBFO QA File | |
| A. Boyea, NWP | ED | CBFO M&RC | |

*ED denotes electronic distribution



CAR CONTINUATION SHEET

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|-------------------|-------------------------|----------------|
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|-------------------|-------------------------|----------------|

Block 15 Acceptance of Proposed Corrective Actions

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-032. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) transmittal QA:17:00172 dated May 16, 2017, from Ms. Mary McDaniel, Manager, Quality and Contractor Assurance, to Mr. Martin P. Navarrete, Carlsbad Field Office.

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:

- CCP has re-confirmed that the correct scale calibration due date is April 13, 2017, not April 13, 2016. This check was performed when the change (considered at the time to be editorial) was made; the recheck now is a conservative action, for completeness.*
- NCR-RHORNL-0369-17 has been issued to address and resolve the CAR condition.*
- As directed in the disposition of NCR-RHORNL-0369-17, BDR ORRDTC16029 is being sent back for Data Generation Level and Project Level re-review and re-approval. The appropriate reviews and approvals will be obtained; the change in the BDR (scale calibration due date) will undergo the same level of approval as the original record.*

Evaluation:

The remedial actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

INVESTIGATIVE ACTIONS:

Extent

An extent-of-condition review was performed to determine if non-editorial changes were present in any other Dose-to-Curie (DTC) BDRs at ORNL, without the same level of approval as the original record. The review encompassed all 30 DTC BDRs at ORNL since April 2016 to present. No conditions similar to the one reported in CAR 17-032 were identified, supporting the conclusion that this was an isolated case.

Impact

As described in the Remedial Action section of this Corrective Action Plan, BDR ORRHDTTC16029 is being re-reviewed and re-approved, and CCP has already confirmed that April 13, 2017, is the correct scale calibration due date. For these reasons, there is not technical or quality impact from the reported condition.

Evaluation:

The investigative actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

CAUSAL ANALYSIS

Not required for this CAR.

CAR CONTINUATION SHEET

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|-------------------|-------------------------|----------------|
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|-------------------|-------------------------|----------------|

ACTION(S) TO PRECLUDE RECURRENCE:


CCP will issue a Lessons Learned stressing the very limited circumstances under which changes may be treated as minor/editorial.

Evaluation:

The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE

The results of the evaluation of the CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 17-032, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 17-032 be accepted.



Evaluation Performed By: Jim Vernon, CTAC

6-2-17
Date