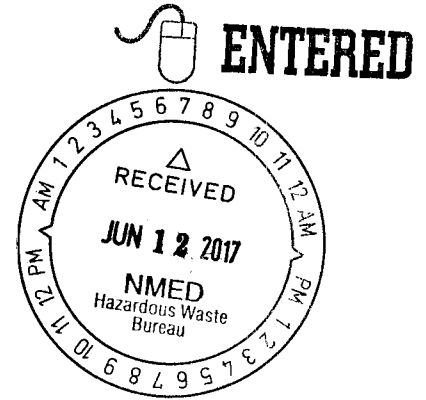




**Department of Energy**  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221  
 JUN 12 2017



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

Subject: Evaluation of the Amended CAPs for CBFO CARs 17-013, 17-014, and 17-015

Dear Ms. McDaniel:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the amended Corrective Action Plans (CAPs) associated with CBFO Corrective Action Reports (CARs) 17-013, 17-014, and 17-015. The results of the evaluation indicate that the amended CAPs provide adequate measures to address the condition adverse to quality noted in the CARs; therefore, the CAPs are approved. Upon completion of all corrective actions, please provide notification and supporting documentation so that verification activities may be performed.

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

Sincerely,

Martin P. Navarrete  
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

E. Garza, CBFO	*ED	J. Kieling, NMED	ED
M. Brown, CBFO	ED	R. Maestas, NMED	ED
D. Miehl, CBFO	ED	D. Biswell, NMED	ED
M. Stapleton, CBFO	ED	T. Runyon, CTAC	ED
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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	



### CAR CONTINUATION SHEET

1. CAR No: 17-013	2. Activity No: A-17-05	3. Page 1 of 3
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#### Block 15 Acceptance of Proposed Corrective Actions

An evaluation was performed of the amended Corrective Action Plan (CAP) developed to address the Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-013. The amended CAP was submitted to Martin Navarrete, Senior Quality Assurance Specialist, via Nuclear Waste Partnership LLC (NWP) transmittal QA:17:00163, dated May 17, 2017 from Ms. Mary G. McDaniel, Manager, Quality and Contractor Assurance.

Italicized text, taken verbatim from the amended 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*

#### **Evaluation:**

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

#### **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 levels 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*

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*– 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.*

**Evaluation:**

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

***Causal Analysis***

***Apparent Cause A4B1C04***

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

**Evaluation:**

Not required for this CAR.

***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 references to controlled Electronic Forms for Personal Air Sampling and Area Air Sampling to WP 12-IH1006.*

***Commitments***

***Due Dates***

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

*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 1 month to assure use of controlled forms.*

*07/14/17*

*Provide closure documentation to NWP Quality Assurance.*

*07/19/17*

*NWP QA, transmit closure documentation to the CBFO.*

*07/26/17*

**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.

### CAR CONTINUATION SHEET

1. CAR No: 17-013	2. Activity No: A-17-05	3. Page 3 of 3
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**Acceptance:**

The results of the evaluation of the amended CAP indicate that the remedial actions, investigative actions, causal analysis, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 17-013, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the amended CAP for CAR 17-013 be approved.

  
\_\_\_\_\_  
Evaluation Performed By: John Hernandez, CTAC

6/9/17  
\_\_\_\_\_  
Date

### CAR CONTINUATION SHEET

1. CAR No: 17-014	2. Activity No: A-17-05	3. Page 1 of 4
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#### Block 15 Acceptance of Proposed Corrective Actions

An evaluation was performed of the amended Corrective Action Plan (CAP) developed to address the Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-014. The amended CAP was submitted to Martin Navarrete, Senior Quality Assurance Specialist, via Nuclear Waste Partnership LLC (NWP) transmittal QA:17:00163, dated May 17, 2017 and QA:17:00190, dated May 31, 2017 from Ms. Mary McDaniel, Manager, Quality and Contractor Assurance.

*Italicized text, taken verbatim from the amended 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*

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- 12-IH1815, LOCAL EXHAUST ANNUAL FACE VELOCITY TESTING
- 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.

**Evaluation:**

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

**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.

**Evaluation:**

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

**CAR CONTINUATION SHEET**

<b>1. CAR No:</b> 17-014	<b>2. Activity No:</b> A-17-05	<b>3. Page 3 of 4</b>
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**CAUSAL ANALYSIS**

***Apparent Cause A4B1C04***

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

**Evaluation:**

Not required for this CAR.

***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.*

***Commitments***

*Each IH procedure will be assigned to a Point of Contact and a Subject Matter Expert.*

***Due Dates***

*06/16/17*

*Revise WP 12-IH1006 to state the personnel qualification requirements to perform IH work.*

*06/16/17*

*Revise WP 12-IH1007 to:*

*06/16/17*

- Reference SAF-101*
- Evaluate forms associated with WP 12-IH1007 and add, subtract or revise as necessary.*
- Accurately state the requirements for record generation*
- State the personnel qualification requirements to perform IH work*

*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.*

*7/17/17*

*Provide closure documentation to NWP Quality Assurance.*

*7/19/17*

*NWP QA, transmit closure documentation to the CBFO.*

*7/26/17*

**Evaluation:**

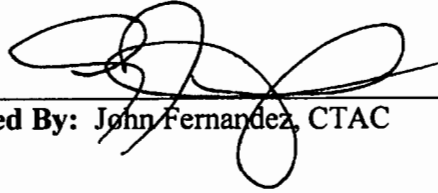
The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

### CAR CONTINUATION SHEET

1. CAR No: 17-014	2. Activity No: A-17-05	3. Page 4 of 4
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**Acceptance:**

The results of the evaluation of the amended CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 17-014, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 17-014 be approved.



Evaluation Performed By: John Fernandez, CTAC

6/9/17  
Date



### CAR CONTINUATION SHEET

1. CAR No: 17-015	2. Activity No: A-17-05	3. Page 1 of 2
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#### Block 15 Acceptance of Proposed Corrective Actions

An evaluation was performed of the amended Corrective Action Plan (CAP) developed to address the Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-015. The amended CAP was submitted to Martin Navarrete, Senior Quality Assurance Specialist, via Nuclear Waste Partnership LLC (NWP) transmittal QA:17:00163, dated May 17, 2017 from Ms. Mary McDaniel, Manager, Quality and Contractor Assurance.

Italicized text, taken verbatim from the amended CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

#### **Remedial Actions:**

- *Provide a clear statement in WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring whether IH equipment requires MSHA approval labels or logos.*

#### **Evaluation:**

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

#### **Investigative Actions:**

*During the investigation, it was determined that air pumps are specifically referenced in MSHA Metal/Nonmetal Health Inspection Procedures Handbook PH06-IV-1, chapter 4. Also, 30 CFR part 56, 57, 58 were reviewed for further guidance and it was determined that it is not a requirement for air sample pumps used in Metal/Non-metal mines to have MSHA approval stickers.*

*The Condition Adverse to Quality (CAQ) was determined to be inaccurate instructions/requirements. Although there is no regulatory requirement for the Gillian pumps to bear the MSHA approval label, this requirement is not clearly stated in the IH program documents*

*A rapid expansion in the IH sampling and monitoring capabilities throughout 2016 caused the CAQ to occur. There is no impact to the overall IH department due to equipment designations or labeling.*

#### **Evaluation:**

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

#### **CAUSAL ANALYSIS**

##### **Apparent Cause A4B1C04**

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

#### **Evaluation:**

Not required for this CAR.

### CAR CONTINUATION SHEET

1. CAR No: 17-015	2. Activity No: A-17-05	3. Page 2 of 2
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**Action(s) to Preclude Recurrence:**

*Procedural guidance or a definition will be added to WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring that clearly specifies which sampling and monitoring equipment is required to bear the MSHA approval label.*

**Commitments**

**Due Dates**

*Provide guidance in WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring stating the requirements for MSHA labels on the IH AIR PUMP sampling equipment.*

06/21/17

*Provide a Management Assessment to assure that instruments are labeled in accordance with WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring.*

07/17/17

*Provide closure documentation to NWP Quality Assurance.*

07/19/17

*NWP QA, transmit closure documentation to the CBFO.*

07/26/17

**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 amended CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 17-015, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 17-015 be approved.

Evaluation Performed By:  John Fernandez, CTAC

  
Date