



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

 **ENTERED**



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

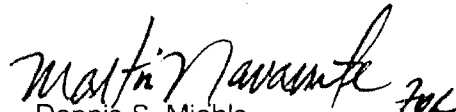
Subject: Acceptance of the CAP for CAR 17-035 Resulting from CBFO Audit A-17-01

Dear Ms. McDaniel:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 17-035. The results of the review indicate that the CAP provides adequate measures to address the condition adverse to quality noted in the CAR; therefore, the CAP is 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 or comments, please contact me at (575) 234-7491.

Sincerely,


 Dennis S. Miehls
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

S. Ross, EM-3.113	*ED	J. Ellis, EPA	ED
M. Brown, CBFO	ED	T. Peake, EPA	ED
J.R. Stroble, CBFO	ED	J. Kieling, NMED	ED
M. Navarrete, CBFO	ED	R. Maestas, NMED	ED
M. Stapleton, CBFO	ED	D. Biswell, NMED	ED
M. Fineran, CBFO	ED	T. Runyon, CTAC	ED
N. Castaneda, CBFO	ED	P. Martinez, CTAC	ED
T. Carver, CBFO	ED	C. Castillo, CTAC	ED
L. Smith, LANL-CO	ED	M. Leroch, CTAC	ED
B. Covert, NWP	ED	P. Gomez, CTAC	ED
R. Salness, NWP	ED	P. Hinojos, CTAC	ED
J. Britain, NWP	ED	G. White, CTAC	ED
V. Ballew, NWP	ED	Site Documents	ED
S. Punchios, NWP	ED	CBFO QA File	
A. Boyea, NWP	ED	CBFO M&RC	
J. Walsh, EPA	ED	*ED denotes electronic distribution	



CAR CONTINUATION SHEET

1. CAR No: 17-035	2. Activity No: A-17-01	3. Page 1 of 3
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Block # 15 Acceptance/Rejection 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) 17-035. The CAP was submitted via Nuclear Waste Partnership (NWP) letter QA:17:00191 UFC:2300.00 (CBFO Unique # 1701185), dated May 31, 2017, from Ms. M. G. McDaniel, Manager, Quality and Contractor Assurance, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, Quality Assurance, 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 ACTION(S)

NWP is taking/has taken the following remedial actions:

- 1. The final procedures were issued during the audit on May 9, 2017.*
- 2. All draft forms that were used in the field for recording field notes were corrected by transferring the data onto the new sheets and verifying data transcriptions. For our file record, the audit closeout notes, the filled out draft forms, and the final filled out forms are included in the field data notebooks.*

Evaluation

The remedial actions described in the CAP are adequate to correct the condition adverse to quality documented in the CAR.

INVESTIGATIVE ACTIONS

The Environmental Monitoring and Hydrology (EM&H) department acquired a new mobile laboratory for obtaining ground water samples for analysis. With this acquisition the lab contained a new generator to power the trailer, and a new pump control module providing power to the submersible pump in the well and to adjust pumping flowrates.

Because of this, one procedure was drafted, WIPP Procedure (WP) 02-EM2008, PT-ECU-63, Generator Set Operation, and another was revised, WP 02-EM1002, Electric Submersible Pump Operation & Maintenance Purging, to reflect the new equipment. The procedures were in draft form when in use during the audit. The operators used the operations manuals in conjunction with the draft procedures to verify that the procedures were sufficiently written for use.

There was confusion amongst the operators when working these procedures through training where the Training Determination Worksheet indicates in a signed check box that the draft version could be used for training material. In discussions with training the operators misunderstood this process and thought they could use it both to train and operate the equipment simultaneously while obtaining ground water samples.

Extent

An extent of condition was performed to see if there were any other out of date procedures being used in the EM&H programs. This evaluation confirmed there were no other out of date or draft procedures being used. It was also determined that using these draft procedure had no impact on the quality of ground water samples or data obtained because the procedures are specifically for operating the new generator and submersible pumps. There are no steps in these procedures for handling the samples or that impact the data quality of the samples.

Impact

None reported.

CAR CONTINUATION SHEET

1. CAR No: 17-035	2. Activity No: A-17-01	3. Page 2 of 3
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Evaluation

The investigative actions described in the CAP are adequate to correct the condition adverse to quality documented in the CAR.

CAUSAL ANALYSIS

Not required for this CAR.

Evaluation

N/A

ACTIONS TO PRECLUDE RECURRENCE

WP 02-EM2008 and WP 02-EM1002 were issued during the audit.

Conduct a formal briefing with the sampling team emphasizing the use of draft procedures is not allowed per WP 13-1, Rev. 36 and Conduct of Operations.

Evaluation

The actions to preclude recurrence described in the CAP are adequate to correct the condition adverse to quality documented in the CAR.

SCHEDULE FOR COMPLETION OF CORRECTIVE ACTIONS

COMMITMENTS

DUE DATES

- | | |
|---|----------------------|
| 1. <i>WP 02-EM2008 and WP 02-EM1002 were issued during the audit.</i> | <i>Complete</i> |
| 2. <i>Correct all draft forms that were used in the field for recording field notes by transferring the data onto the new sheets and verifying data transcriptions</i> | <i>Complete</i> |
| 3. <i>Provide formal briefing to all EM&H staff regarding the proper use of procedures for performing work. This briefing will stress that using a draft procedure is in violation of the QAPD 13-1 and conduct of operations. All briefed personnel will sign a briefing sheet to indicate understanding of the topic and presence at the briefing. The sign-in sheet will be provided as closure documentation.</i> | <i>June 29, 2017</i> |
| 4. <i>NWP to provide closure documentation to NWP Quality Assurance (QA).</i> | <i>July 11, 2017</i> |
| 5. <i>NWP QA, transmit closure documentation to the CBFO.</i> | <i>July 18, 2017</i> |

Evaluation

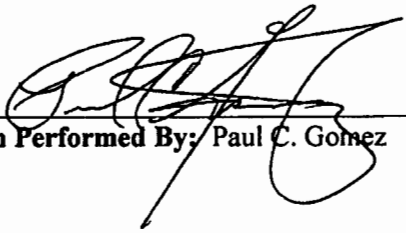
The proposed schedule for completion of corrective actions is deemed to be acceptable. The expected completion date for all corrective actions is July 31, 2017.

CAR CONTINUATION SHEET

1. CAR No: 17-035	2. Activity No: A-17-01	3. Page 3 of 3
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ACCEPTANCE

Evaluation of the CAP indicates that remedial actions, investigative actions, and actions to preclude recurrence satisfactorily address the condition adverse to quality identified in CAR 17-035. Therefore, it is recommended that the CAP for CAR 17-035 be approved.


Evaluation Performed By: Paul C. Gomez

June 8, 2017
Date