



**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:** Verification and Acceptance of Corrective Actions for CAR 17-031 from Audit A-17-21, Oak Ridge National Laboratory Recertification Audit, conducted April 18 – 20, 2017

Dear Ms. McDaniel:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation and verification of documentation demonstrating completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 17-031, which resulted from Audit A-17-21. The results of the verification are documented on the enclosed CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions is acceptable.

The verification concluded that the associated corrective actions are acceptable. The CAR is considered closed.

If you have any questions or comments regarding the CAR closure, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete  
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure

S. Cange, EM-1 \*ED  
S. Ross, EM-3.113 ED  
J. Carswell, CBFO ED  
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K. Chester, CTAC ED  
P. Hinojos, CTAC ED  
G. White, CTAC ED  
Site Documents ED  
CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution

### CAR CONTINUATION SHEET

1. CAR No: 17-031

2. Activity No: A-17-21

3. Page 1 of 3

**Blocks #16 & 17 Acceptance of Corrective Actions Completion and Closure:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 17-031, including objective evidence and supporting documentation submitted by Nuclear Waste Partnership LLC (NWP) transmittal letter QA:17:00197 UFC 2300.00 dated May 5, 2017 from Ms. Mary G. McDaniel, Manager, Quality and Contractor Assurance, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

*Italicized text, taken verbatim from the Corrective Action Plan (CAP) is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.*

***Remedial Actions:***

*The SPM appointment letter has been annotated with a reference to CBFO CAR 17-031 and a description of the issue.*

**Verification:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The CAP addresses the use of an out-of-date, previously downloaded Attachment 7 for the Site Project Manager (SPM) Appointment. *The SPM Appointment letter was annotated on 5/5/17 with a reference to this CAR, CAR 17-031 and counseling of the SPM was documented via email.*

***Investigative Actions:***

*During interview, the SPM did not recall specifics from an action taken almost two years ago, but the SPM agrees that the condition almost certainly resulted from re-use of a previously-downloaded Attachment 7 that the SPM completed and signed, without verifying that the version was still current.*

***Extent***

*CCP Training completed a review of the fifteen (15) other SPM appointment letters issued in the last twelve months, and found no other cases where an obsolete version of the Attachment 7 form had been used. The condition is isolated to the one described in the CAR.*

***Impact***

*Although SPMs are required to use the Attachment 7 form when making appointments, the procedure (see the NOTE above Section 3.1.6 in Revision 38) states that "Attachment 7 ... is a template to be used by the ... SPM ... As a template/outline, it may be customized by the SPM, as necessary."*

*Since the appointment letter contained exactly the information the SPM intended it to contain, there is no technical or quality impact from the reported condition. The validity of the appointment is not in question and the letter does not need to be amended or re-issued.*

**CAR CONTINUATION SHEET**

1. CAR No: 17-031

2. Activity No: A-17-21

3. Page 2 of 3

**Verification:**

Investigative actions and extent of condition were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MPN:BA:17-1906:UFC 2300.00. Additional emails were also sent to verify the investigative actions and were found to contain the closure documentation required.

***Causal Analysis***

*N/A*

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

*The SPM who used an obsolete version of the Attachment 7 form has been counseled on the requirements in CCP-PO-005 for verifying that procedures and fillable forms must be verified current at the beginning of each shift.*

***Commitments***

***Due Dates***

*CCP to annotate the SPM appointment letter with a reference to CBFO CAR 17-031 and a description of the issue. Complete*

*CCP to complete a review of other SPM appointment letters issued in the last twelve months, for any similar conditions. Complete*

*CCP to counsel the SPM who used an obsolete version of the Attachment 7 on the requirements in CCP-PO-005 for verifying that procedures and fillable forms must be verified current at the beginning of each shift. Complete*

*Provide closure documentation to NWP Quality Assurance (QA) Complete*

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

**Verification:**

The objective evidence submitted in the closure was reviewed and verified to meet the remedial actions, investigative actions, extent of conditions, and actions to preclude reoccurrence. The objective evidence includes:

- (1) Annotated Attachment 7 – SPM Appointment Letter showing Obsolete and a reference to CAR 17-031 dated 5/5/17

### CAR CONTINUATION SHEET

1. CAR No: 17-031

2. Activity No: A-17-21

3. Page 3 of 3

- (2) Email referencing a search through 16 appointment letters for Subject Matter Experts, Visual Examination Experts, Remote-Handled Technical Staff and Expert Analysis for the last year
- (3) 15 SPM Appointment Letters including the SPM Appointment Letter that resulted in CAR 17-031
- (4) Email referencing the counseling of the SPM responsible for not following CCP-PO-005 and a May 15<sup>th</sup> staff meeting on the subject that resulted in the CAR
- (5) Emails from Central Characterization Program (CCP) Training and NWP QA showing complete and submitted documentation for closure that was not originally included in NWP transmittal letter QA:17:00197 UFC 2300.00 dated May 5, 2017

#### CONCLUSION

Based on the results of the review and verification of the objective evidence included in the CAR 17-031 closure package, it is recommended that CAR 17-031 be closed.



Verification Performed By: John Fernandez, NQA-1 Auditor

6/8/17  
Date